

Shareholder Privacy Statement

This Privacy Statement details how Edelweiss Holdings plc will collect, use and share your personal information and details how to exercise your legal rights.

In this Privacy Statement references to 'the Company', 'we', 'us' or 'our' refer to Edelweiss Holdings plc.

The personal information we may collect

The Company may collect the following personal information about you:

- identification information (which may include full name, date of birth, marital status, passport/ national identification card, driving license social security number, national insurance number, tax identification number, IP address or other electronic identifiers);
- contact information (which may include email address, residential and/or business address and telephone numbers);
- employment information (which may include details of your current and previous employment, professional qualifications, any shareholdings and/or directorships); and/or
- financial information (which may include sources of wealth, any shareholdings or assets that you may have, bank account details), tax status; and
- such other information you may provide in the course of your dealings with us or which we require.

In certain circumstances, we may process 'special categories' of personal data (as defined by the Data Protection (Jersey) Law 2018, including but not limited to actual or alleged criminal convictions and offences.

How we collect your personal information

In addition to any personal information that you provide directly to the Company, we collect personal information from the following sources, including but not limited to:

- application forms or other materials that you or your authorised representative submits to us during the course of your relationship with the Company;
- you or your authorised representative's business dealings with the Company, including via email or telephone;
- information we obtain during due diligence checks (including but not limited to credit and anti-money laundering checks);
- information from third party sources including but not limited to, intermediaries' representative or registrar and transfer agents, financial institutions a supervisory or regulatory body; and/or
- information collected by any of our websites (<https://edelweissholdings.com> and <http://edelweissjournal.com>).

Purposes of processing your personal information:

Your personal data may be processed by the Company (or any of its affiliates, agents, employees, delegates or sub-contractors) for the following purposes:

1. to permit, record and facilitate your holding of Shares of the Company and the management and administration of your shareholding on an on-going basis; together being (the “Services”) which are necessary for the performance functions related to your relationship with the Company, including without limitation the processing of repurchases, transfers and additional subscription requests and the payment of any monies between you and the Company;
2. in order to carry out anti-money laundering checks and related actions which the Company considers appropriate to meet any legal obligations imposed on it relating to, or the processing in the public interest or to pursue the Company’s legitimate interests in relation to, the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions, on an on-going basis, in accordance with the Company’s anti-money laundering procedures;
3. to report regulatory and tax related information to regulatory and tax authorities in order to comply with any legal obligation, including but not limited to any obligation arising under legislation implementing the US Foreign Account Tax Compliance Act of 2010, as amended, and the Organisation for Economic Co-operation and Development’s Common Reporting Standard;
4. to monitor and keep records of calls and electronic communications for (i) processing and verification of instructions, (ii) investigation and fraud prevention purposes, (iii) crime detection, prevention, investigation and prosecution, (iv) to enforce or defend the Company’s and its affiliates’ rights or obligations, itself or through third parties to whom it delegates such responsibilities or rights in order to comply with any legal obligation imposed on the Company, (v) to pursue the Company’s legitimate interests in relation to such matters or (vi) where the processing is in the public interest;
5. to disclose information to other third parties such as service providers to the Company, including; administrators, accountants, share registrars, auditors, regulatory authorities and technology providers in order to comply with any legal obligation imposed on the Company or in order to pursue the legitimate interests of the Company;
6. to monitor and keep records of calls for quality, business analysis, training and related purposes in order to pursue the legitimate interests of the Company to improve its operations;
7. to update and maintain financial and other records;
8. to retain AML and other records of individuals to assist with the subsequent screening of them by the by or on behalf of the Company; and
9. which are necessary to comply with the Company’s legal obligations and/or which are necessary for the Company’s legitimate interests indicated above and/or the processing is in the public interest.

Sharing your personal information

The Company does not undertake marketing activities for third parties, nor does it provide information to third parties for their own marketing purposes.

The Company may disclose your personal information as follows:

1. to its service providers, including the registrar and transfer agent, corporate secretary, accountants, and their affiliates, and other third-party service providers engaged by the Company in order to process the data for the above mentioned purposes; and/or
2. any regulatory, supervisory or government or quasi-government authorities (including tax authorities), to the extent that we are required by law to do so, or to affiliates for internal investigations and reporting and in other limited circumstances, for example if required by a court order or authority or if we believe that such action is necessary.

International transfers of your personal information

Where the Company transfers personal information to a jurisdiction outside the European Economic Area (“EEA”), the Company will ensure that all data protection requirements applicable to the information are adhered to, for example:

- the recipient may be located in a country that has been assessed by the European Commission as providing an “adequate” level of protection (this includes Jersey and Switzerland);
- the recipient may have signed a contract based on standard contractual clauses approved by the European Commission; or
- data protection legislation may permit us to otherwise transfer your personal information.

You may obtain more information in relation to the protection applied to your personal information by contacting the Company.

Retention of your personal information

Your personal information will be retained by the Company for no longer than is necessary for the purpose for which it was obtained by the Company or as required or permitted for legal and regulatory purposes, or for the Company’s legitimate business purposes.

Access to and control of your personal information

You have the following rights, in certain circumstances, in relation to your personal information that we process about you:

- the right to access and port personal information;
- the right to rectify personal information if you consider that it is inaccurate;
- the right to restrict the use of personal information (in certain circumstances);
- the right to request that personal information is erased (in certain circumstances); and
- the right to object to processing of personal information (in certain circumstances).

Failure to provide the Company with accurate personal information will mean we are unable to appoint you as a shareholder of the Company. If any personal information that has been provided becomes inaccurate the Company should be informed as soon as possible.

You have the right to lodge a complaint about the processing of your personal information either with us, or with the Office of the Information Commissioner for Jersey (<https://oicjersey.org/online-enquiry/#/complain/form>), the Federal Data Protection and Information Commissioner (<https://www.edoeb.admin.ch/edoeb/en/home/the->

[fdpic/contact.html](#)) or the data protection authority in the European Union Member State of your usual residence or place of work.

How to contact us

If you have any questions about our use of your personal information, please contact us at:

Company Secretary
Edelweiss Holdings plc
6 Caledonia Place
St Helier
Jersey
JE1 1EH

Email: dataprotection@edelweissholdings.com

Changes to this Statement

We may change this Statement from time to time by updating this page. You should check this page from time to time to ensure you are comfortable with any changes. We last updated this Statement on 6 October 2018.

This statement is for your information and should not be used as the basis for any decision to purchase or redeem investments in the Company. The views and information expressed in this policy do not constitute and may not be relied upon as constituting any form of investment advice or inducement to invest and prospective investors must obtain appropriate investment advice before making investment decisions.