



PRIVACY NOTICE

APEX FINANCIAL SERVICES B.V.

This Privacy Notice is issued by Apex Financial Services B.V., Van Heuven Goedhartlaan 935A, 1181 LD Amstelveen, the Netherlands and applicable to its subsidiary Apex Fiduciary Services B.V.. and affiliated companies Apex Administrative Services B.V. and Apex Company Secretarial Services B.V.

1 Who are Apex?

Apex Group ("Apex") is a trading name of Apex Financial Services B.V. is a part of Apex Group and principally offers corporate and administration services. More details on the trading companies can be found on the "Legal and Regulatory Status" page on the Apex website (<https://apexfundservices.com/regulatory-status/>).

All of the companies are wholly owned subsidiaries of Apex Group Limited ("Apex"). For more information on Apex Group, please visit <https://apexfundservices.com/>.

2 What is this Privacy Notice?

At Apex Financial Services we collect personal information about you and are committed to protecting this information and your privacy. Set out below is an explanation of how we use, collect and safeguard your personal information. This Privacy Notice applies where Apex Financial Services B.V. receives personal data through its website, or in connection with any services provided to you ("Services").

3 What personal information do we collect?

Apex Financial Services will collect and use only as much personal data from you as is necessary to be able to provide you with the products and services you have requested from us. You may provide us with your personal information where you enter your personal information via our website, engage with us in respect of our Services, or correspond with us by phone, email or otherwise. Depending on the services, products or information you request from us, we may ask you to provide the following personal information:

- name, date and place of birth, address, email address, telephone number and other contact details, social security number, nationality, gender, marital status, copy of ID documents, source of wealth, utility bill, bank statements and tax residency;
- bank account details or other payment or financial information;
- a record of any correspondence you have with us, including certain telephone calls; and
- online identifiers including IP address and cookies.

We may, from time to time, receive information about you from other companies in the Apex Group or our network, or from publicly available sources

4 Why do we collect your personal information and what is the legal basis?

We collect this information to enable you to use our website and to provide any Services to you. Our use of your information is based on either performance of a contract, legitimate business interest or required by law to provide the Services.

In addition, we are required by law to obtain “know your client” information as detailed in our terms of engagement for our Services, and this includes certain personal information including information contained in a formal identification document or other unique reference relating to you.

5 How do we use your personal information?

We will use the information we hold about you for the following purposes:

- To provide you with the services, products, and/or information you request from us;
- To check your identity;
- To assess any application you make to participate in any service we provide;
- Prevent and detect fraud and/or money laundering;
- To communicate with you as necessary;
- To carry out analyses about our services and how we might improve them; and
- To notify you about changes to our services.

6 Who we share personal information with?

We will only disclose your personal information in accordance with applicable laws and regulations. We will disclose your information to the following third parties:

- Any person with legal or regulatory power (such as the Dutch Central Bank, Tax Authorities, police or Dutch Data Protection Agency that may require disclosure on legal grounds);
- Service providers engaged by us to help us run our business and perform the Services. Such service providers will include, for example, cloud storage providers (engaged by us to provide electronic storage facilities for our business data and your information);
- Any member of the Apex Group which means our subsidiaries, our ultimate holding company and its subsidiaries (from time to time) as necessary to perform the Services.

Some of these third parties (including Apex Group subsidiaries and service providers) may be outside of the European Economic Area (EEA). We will ensure that any such subsidiary or service provider has put in place adequate safeguards to ensure that your information is held securely and in accordance with this Privacy Notice.

Transfers within the Apex Group will be covered by an agreement entered into by members of the Apex Group (an intra-group agreement) which contractually obliges each member to ensure that your Personal Data receives an adequate and consistent level of protection wherever it is transferred within the Group.

7 How we keep your information secure?

We store the information you provide about yourself in a secure database or when it concerns physical information in a secure cabinet and take appropriate security measures to protect such information from unauthorized access. For example, we have adopted internal data protection procedures and trained our staff with a view to preventing breaches of security. All electronic exchanges of information goes through encrypted channels in order to prevent interception of your information. As Apex websites are grouped to the internet, which is inherently insecure, Apex cannot guarantee the information you supply will not be intercepted while being transmitted over the internet. Accordingly, Apex has no responsibility or liability for the security of personal information transmitted via our website.

8 How long we will store your information for?

We generally hold your personal data on our systems for as long as is necessary to provide the Services and as required by law. This is ordinarily 5-10 years from the date you cease to use the Services in order to allow us to refer to your information in correspondence with you, or in connection with legal or regulatory proceedings.

9 Your rights

You have the following rights in relation to how we use your information. If you'd like to exercise these rights, please contact us using the contact details listed at section 13 ***"Whom can you speak to about this Privacy Notice?"***

- Right of access – you have the right to know if we are using your information and, if so, the right to access it and to receive information about how we are using it.
- Right of rectification – you have the right to require us to rectify any errors in the information we hold about you.
- Right to erasure – you have the right to require us to delete your information if our continued use is not justified.
- Right to restrict processing - in some circumstances, although you may not be entitled to require us to erase your information but may be entitled to limit the purposes for which we can use your information.
- Right of data portability – you have the right to require us to provide you with a copy of your information in a commonly used machine-readable format or to transfer your information directly to another controller (e.g. a third party offering services competing with ours).
- Right to object for using your information for direct marketing purposes.

Apex Financial Services does not make decisions about you using automated decision making or profiling of your personal data.

10 How do apex websites use my Internet Protocol (IP) address and collect cookies?

Each time you use our websites, we will automatically collect certain technical information, including the type of browser you use, the Internet Protocol (IP) address used to connect your computer to the internet,

and information about your visit, including the full Uniform Resource Locations (URL), clickstream to, through and from our sites, traffic data and other communication data, the resources that you access, and the information derived from the cookies we place on your mobile device and/or computer. In order to improve the quality of our website and services, we may from time to time send your computer a "cookie". Cookies are text files that identify your computer to our server and are stored on your device. Cookies in themselves do not identify the individual user, just the computer used. Cookies enable us to improve your user experience by avoiding the need for you to enter the same information more than once. They also allow us to analyse user behaviour to improve the functionality and performance of our website.

We comply with the EU cookie regulations through the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011. There are two types of cookies that can be stored on your device:

- "session cookies", which only last for the duration of your visit to our website and are automatically deleted from your device when you close your browser; and
- "persistent cookies", which remain on your device after you have visited our website and are not deleted when you close your browser. Persistent cookies are sent back to our server every time you visit our website.

We make use of session cookies, which are essential to maintain security throughout the site, and do not use them for tracking purposes. Session cookies are used to help us remember your movements from page to page, avoiding the need for you to re-enter the same information. Session cookies are held in memory and expire when you leave our website.

In addition, in order to develop our site in line with customers' needs, Apex uses analytics and optimization services provided by WT EMEA Acquisitions Ltd (WebTrends) to track and analyse how parts of the site are used. We use this information to help improve the site. The data collected by WebTrends will be stored exclusively for analytical purposes and does not result in any personally identifiable data being collected or stored. WebTrends will send your computer a persistent cookie in order to evaluate your use of this site. WebTrends store the information collected by the persistent cookie on servers in the United States, European Union Member States and other countries. WebTrends may also transfer this information to third parties where required to do so by law, or where such third parties process the information on WebTrends' behalf. WebTrends will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. WebTrends will not associate your IP address with any other data held by WebTrends. Apex uses WebTrends to optimise this site and improve the service we provide to our visitors. This ensures that the website is fully functional and optimised to create the best possible user experience.

We never gather other information from your disk or computer. We will collect a copy of the data held by the cookie. We use full SSL protocols when collecting visitor information on secure pages; this ensures that the site's security is not compromised. We encrypt all transmitted visitor information (even from non-secure pages), so no-one else can read the information we gather. None of the cookies used on our websites collect, record or store personally identifiable information about you.

By continuing to use this website, you agree to us placing session cookies on your device for the purposes detailed above. Most users will be able to adjust their internet settings to accept all cookies, to be notified them when a cookie is issued, or not to receive cookies at any time. The last of these, of course, means that certain personalised services cannot then be provided to that user. Please note that the websites that are linked to this site may also make use of their own cookies. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

11 Following links from our websites

Our site may contain links to other sites. Such other sites may also make use of their own cookies and will have their own privacy policies. You should carefully review the privacy policies and practices of other sites, as we cannot control or be responsible for their privacy practices. We do not accept any liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.

12 Changes to this Privacy Notice

This Notice will be reviewed and may be changed from time to time. Any changes we may make to our Privacy Notice will be posted on this page.

13 Who can you speak to about this Privacy Notice?

Questions, comments and the exercise of your rights regarding this Privacy Notice and your information are welcomed and should be addressed to the Data Protection Officer by e-mail: privacy@linkgroupnetherlands.nl or by post to Van Heuven Goedhartlaan 935A, 1181 LD Amstelveen, The Netherlands

If you wish to make a complaint on how we have handled your personal information, you can contact our Data Protection Officer. If you are not satisfied with our response or believe we are processing your personal information not in accordance with the applicable law you can complain to the supervisory authority in the Netherlands responsible for the implementation and enforcement of GDPR: the Dutch Data Protection Authority (Autoriteit Persoonsgegevens hereafter the "AP"). You have the right to complain to the AP about our collection and use of your information. You can contact the AP via their website – <https://autoriteitpersoonsgegevens.nl/>