## Quest Management Inc.

#### DATA PROTECTION PRIVACY NOTICE

Quest Management Inc. (*Quest, we* or *us*) is incorporated in Cayman Islands and its registered office is at 4<sup>th</sup> Floor, Harbour Place, 103 South Church Street, PO Box 10240, Grand Cayman, KY1-1102, Cayman Islands.

Quest is a data controller in respect of personal data for the purposes of the Cayman Islands Data Protection Law, 2017. As such, Quest is responsible for ensuring that it uses personal data in compliance with Cayman Islands Data Protection Law.

Quest is registered with the Cayman Islands Monetary Authority as an investment manager and manages the assets of private investment funds (the *Funds*).

This privacy notice applies to you if (i) you are an applicant for or you currently hold equity interests in a Fund, (ii) your personal data has been provided to us in connection with your application for, or your holding of, equity interests in a Fund by another person (such as where you are a director, partner, trustee, employee, agent or direct or indirect owner of an applicant) or (iii) we otherwise use your personal data. This privacy notice sets out the basis on which personal data about you will be processed by us. Please take the time to read and understand this privacy notice.

## Uses of your personal data

Your personal data may be stored and processed by us for the following purposes:

- assessing and processing applications for shares in a Fund and other dealings with a Fund, including performing know-your-client procedures, issuing and redeeming shares, receiving payments from and making payments to investors, calculating net asset value, and overseeing these processes for the Funds
- general business administration, including communicating with investors of the Funds, communicating with service providers and counterparties, accountancy and audit services, risk monitoring, the administration of IT systems and monitoring and improving products and services that we offer
- compliance with legal and regulatory obligations and industry standards, including know-yourclient procedures, the automatic exchange of tax information and legal judgments
- dealing with service providers and counterparties to us and the Funds, decision-making in relation to the Funds and their investments, business strategy, development and marketing.

We are entitled to process your personal data in these ways for the following reasons:

- if you are the applicant, you may enter into an investment contract with a Fund, with whom we
  have an investment management agreement contract, and some processing will be necessary for
  the performance of your contract with the Fund, or will be done at your request prior to entering
  into that contract
- processing may be necessary to discharge a relevant legal or regulatory obligation

- the processing will, in all cases, be necessary for our legitimate business interests or the legitimate business interests of the Fund, the Fund's administrator or another person, such as:
  - carrying out our ordinary or reasonable business activities or the ordinary or reasonable business activities of the Fund, the Fund's administrator or other persons, or other activities previously disclosed to the Fund's investors or referred to in this privacy notice
  - ensuring compliance with all legal and regulatory obligations and industry standards, and preventing fraud
  - establishing, exercising or defending legal rights or for other purposes relating to legal proceedings
  - ensuring the security of information systems.
- you have given your explicit consent (this basis is used only exceptionally)
- in respect of any processing of sensitive personal data falling within special categories, such as any personal data relating to the political opinions of a politically exposed person, the processing will be subject to additional safeguards.

## Personal data that we might use

We might process the following personal data about you:

- Information provided to us or a Fund by you or (if different) the applicant which might include your name and address (including proofs of name and address), contact details, date of birth, gender, nationality, photograph, signature, occupational history, job title, income, assets, other financial information, bank details, investment history, tax residency and tax identification information. Such information might be provided in an application form or in other documents (as part of an application process or at other times), face-to-face, by telephone, by email or otherwise.
- Information that we or a Fund collects or generates which might include information relating to your (or an applicant's) investment in a Fund, emails (and related data), call recordings and website usage data and messages submitted through the fund administrator's website.
- Information that we or the Fund obtains from other sources which might include information
  obtained for the purpose of our or the Fund's know-your-client procedures (which include antimoney laundering procedures, counter-terrorist financing procedures, politically-exposed-person
  checks, sanctions checks, among other things), information from public websites and other
  public sources and information received from the applicant's advisers or from intermediaries.

## Disclosure of your personal data to third parties

We may, from time to time, in accordance with the purposes described above, disclose your personal data to other parties, including the Fund, the Fund's administrator and its affiliates, professional advisers such as law firms and accountancy firms, other service providers to us and the Fund, and the Fund's administrator, including technology service providers, counterparties and courts and regulatory, tax and governmental

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authorities. Some of these persons will process your personal data in accordance with our instructions and others will themselves be responsible for their use of your personal data. These persons may be permitted to further disclose the personal data to other parties.

#### Transfers of your personal data outside the Cayman Islands

Your personal data may be transferred to and stored by persons outside the Cayman Islands, and in particular may be transferred to and stored by affiliates or service providers of the Fund or the Fund's administrator outside the Cayman Islands.

Where personal data is transferred outside the Cayman Islands, we will ensure that the transfer is subject to appropriate safeguards or is otherwise permitted under applicable law. For example, in the context of personal data transferred outside the Cayman Islands, the country to which the personal data is transferred may be a European Economic Area member, a country approved by the European Commission or the recipient may have agreed to model contractual clauses approved by the European Commission that oblige them to protect the personal data.

You can obtain more details of the protection given to your personal data when it is transferred outside the Cayman Islands or the European Economic Area, including a copy of any standard data protection clauses entered into with recipients of your personal data, by contacting us using the details set out under "Contacting Us" below.

### Retention of personal data

How long we hold your personal data for will vary. The retention period will be determined by various criteria, including the purposes for which we are using it (as it will need to be kept for as long as is necessary for any of those purposes) and legal obligations (as laws or regulations may set a minimum period for which we have to keep your personal data).

## Your rights

You have a number of legal rights in relation to the personal data that we hold about you. These rights include the following:

- the right to obtain information regarding the processing of your personal data and access to the personal data that we hold about you.
- the right to request that we rectify your personal data if it is inaccurate or incomplete.
- in certain circumstances, the right to object to, and the right to request that we restrict, our processing of your personal data. There may be circumstances where you object to, or ask us to restrict, our processing of your personal data but where we are legally entitled to continue processing your personal data or to refuse that request.
- the right to ask we not subject you to automated decision making that uses your personal data.
- the right to object to us using your personal data for direct marketing purposes.
- the right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

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You can exercise your rights by contacting us using the details set out under "Contacting Us" below. You can also find out more information about your rights under applicable Cayman Islands data protection law by contacting the Cayman Islands Ombudsman, the data regulator in the Cayman Islands, or by searching its website at <a href="https://www.ombudsman.ky">www.ombudsman.ky</a>

# **Contacting Us**

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed above, please address questions and requests to Doug Barnett (Email: <a href="mailto:doug@questthai.com">doug@questthai.com</a>; Tel: +1-832-844-1282).

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