

**PRIVACY STATEMENT
SILVERCROSS INVESTMENT
MANAGEMENT**

June 2018



Our services are based on trust. You trust us to listen carefully to you, you trust us to use your information to provide you with the best services, and you trust us to process your personal data in a way that protects your privacy. Trust is an inseparable part of our mission: to be your best possible ally.

This privacy statement explains how we process your personal data.

What are personal data?

Personal data are all data that say something about you or that can be linked to you in any way, such as your name, telephone number, and e-mail address. Your social security number and your bank account number are also personal data. In short, personal data includes any data from which we can infer who you are.

How do we collect your data?

We receive a large part of the data directly from you when you become our client or when you contact us otherwise. Additionally, if we need to do so to render our services, we also process data originating from other parties, such as Google or the Chamber of Commerce.

What do we use your personal data for?

We request and process your personal data in order to provide you with the best possible services we can.

Among other things, your personal data allows us:

- to contact you;
- to include your data correctly in our systems;
- to update your data in case of changes;
- to draft agreements;
- to execute your financial orders;
- to perform marketing activities, such as sending out mailing campaigns and invitations;
- to enhance and innovate our services;
- to implement internal quality audits relating to the regulation;
- to comply with statutory requirements, such as:
 - identification requirements;
 - duty-of-care requirements;
 - data-disclosure requirements of the Netherlands Internal Revenue Service, government agencies, and regulators;
 - requirements under international laws and regulations in the field of anti-money laundering and terrorist financing, for example.

We process personal data of all our clients, as well as representatives of our (corporate) clients, suppliers, and stakeholders.

What personal data do we process?

- Your name, address, telephone number, and e-mail address, as well as those of your company or foundation, if you have one.
- Data included on your proof of identity.
- Your role in any agreement we enter into with you (whether you are an agent, legal representative, executive, or ultimate beneficial owner).
- Payment data, designated payment accounts.
- Contact history, such as the data discussed in our contact, and when and how we had contact.
- Information about security and fraud prevention.
- Data about your financial situation.

What are special (sensitive) personal data and which do we process?

Special personal data are data relating to any criminal record, biometric and genetic record, social security number, and data relating to health, religion, political or philosophical views, trade-union membership, sexual orientation, or ethnicity.

Processing these data is subject to strict rules. The only special personal data we normally record is your social security number when you enter into a personal agreement with us. We need your social security number in order to comply with our statutory duty of verifying your identity and furnishing information to the Netherlands Internal Revenue Service. Additionally, we record data about any fraud in order to determine whether we want to establish or maintain a relationship with you.

We do not use or process any data involving the other special personal data, unless we need these to properly perform our business operations. In such case, we would only do so after having obtained your express consent.

Do we share personal data?

We will only share personal data with third parties if it is necessary to give you the best services we can or to comply with statutory requirements, or if you have expressly consented thereto.

If performance of the agreement requires us to share personal data, we will only do so if a data processing agreement has been entered into with the third party in question which provides the same level of security and confidentiality as we provide. We remain responsible for this.

Our compliance with statutory requirements would for example include sharing your data with government agencies, regulatory agencies, supervisory agencies, the Netherlands Internal Revenue Service, and law enforcement authorities. Obviously, these agencies are required to comply with statutory requirements for using such data.

We will ensure that such third parties will have access only to the personal data that is necessary for their specific work activities.

Do we secure your personal data?

We consider proper security for your data of utmost importance. Consequently, we invest in securing our systems that store personal data and we also invest in our employees with respect to this matter.

All our employees have signed a confidentiality agreement and sworn the banker's oath. Additionally, we make sure that only authorized staff is allowed to access and process your data.

The way in which we process your personal data is also supervised by the Netherlands Data Protection Authority. For general information about the new privacy rules and also for any complaints, please contact:

Data Protection Authority
P.O. Box 93374
2509 AJ The Hague
<https://autoriteitpersoonsgegevens.nl/en>

How long do we store your personal data?

Your personal data are kept for a predetermined period. We of course store your information during the course of our relationship but after a possible termination of this relationship we follow the legal bases in most cases. In the case of a client relationship for example, this means storing the information for a seven-year period. In most other cases this period will be shorter with a maximum storage period of two years.

Accessing, modifying, or removing data

You can always request us to access, correct, transfer, or remove your personal data, or object against or limit the use thereof. Additionally, you can request a copy of your data from us, for example, for another service provider you may wish to engage. For this purpose, you can contact our Data Protection Officer using the contact details mentioned at the end of this Privacy Statement.

For the sake of your security, the Data Protection Officer may ask you to identify yourself before entering into any in-depth discussion of your request. In analyzing the merits of your request, we will balance your interests against ours and inform you as soon as possible, in any case within four weeks.

Cookies

Cookies are small files which are installed on your computer or mobile telephone and which are mainly used to store user preferences. The cookies that are installed when you use our website and IBS Online will only be active when you use our website and will be removed as soon as you log off.

Automated decision-making and profiling

We do not use any automated decision-making or profiling when we provide our services. In the (near) future we might decide to use these, for example, in order to implement innovations to enhance our services. When this happens, we will change our Privacy Statement and make the most recent version available. You can always access the most recent version of our Privacy Statement on our website:

<https://silvercross-im.com/regulatory/>.

Questions and contact

If you have any questions about our privacy policy, please contact our Data Protection Officer:

IBS Capital Allies
Attention: Data Protection Officer
De Cuserstraat 87
1081 CN Amsterdam
privacy@ibsc.nl