

VISTRA MACAU SAR PRIVACY NOTICE

This Privacy Notice explains how particular companies in the Vistra Group collect, use and disclose your personal data, and your rights in relation to the personal data it holds.

Vistra Administration Services Limited, a company registered in the Cayman Islands under company number 130455 with its registered office at c/o Campbells Corporate Services Limited, Floor 4, Willow House, Cricket Square, Grand Cayman KY1-9010, Cayman Islands through its registered Macau branch office doing business under the name Vistra Administration Services Limited - Macao Commercial Offshore and located at 18/F, Praia Grande Commercial Centre, 429 Avenida da Praia Grande, Macau SAR (in this Privacy Notice, “us”, “we” and “our”) is the data controller of any personal data we process in relation to you.

Our contact details are:

Telephone number: +853 2870 1530

Fax: +853 2833 0059

Email: macau@vistra.com

This Privacy Notice supersedes any privacy notice or equivalent policy issued by us in relation to Macau SAR previously.

Your Rights

You have the following rights in regard to any of your personal data that we process:

- Confirmation as to whether or not personal data relating to you is being processed by us and information as to the purposes of the processing, the categories of personal data concerned and the recipients or categories of recipients to whom such personal data is disclosed;
- Communication of the personal data undergoing processing and of any available information as to their source;
- The rectification, erasure or blocking of personal data, the processing of which does not comply with the provisions of the Macau Personal Data Protection Act (Law no. 8/2005 of August 22), in particular because of the incomplete or inaccurate nature of such personal data;
- The right to object at any time to the processing of personal data relating to you;
- To request us not to send you any marketing communications.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

You can find out more about any rights you may have under local legislation at www.gpdp.gov.mo. If you are not based in Macau SAR, other local data protection laws and regulations may also apply. In such cases, please refer to your local regulator.

If you have any questions about how we use your personal data, or you wish to exercise any of the rights set out above, please contact us using any one of the following:

By post: Attn: Director, Vistra Administration Services Limited - Macao Commercial Offshore, 18th Floor, Praia Grande Commercial Centre, 429 Avenida da Praia Grande, Macau SAR.

By email: macau@vistra.com

By telephone: +853 2870 1530

By fax: +853 2833 0059

If you are not satisfied with how we are processing your personal data, you can also make a complaint to the:

Macau SAR Office for Personal Data Protection

Address: Avenida da Praia Grande, N.º 804, Edif. China Plaza, 17.º andar, Macau

P.O. Box: P.O. Box 880, MACAU

Tel: +853 2871 6006

Fax: +853 2871 6116

Email – info@gpdp.gov.mo

How we collect your data

We may collect your personal data in a number of ways, for example:

- From the information you provide to us when you meet us;
- From information about you provided to us by your company or an intermediary;
- When you communicate with us by telephone, fax, email or other forms of electronic communication. In this respect, we may monitor, record and store any such communication;
- When you complete (or we or others complete on your behalf) client information forms;
- From other companies in the Vistra Group;
- From your agents, advisers and/or intermediaries;
- From publicly available sources or from third parties.

The categories of personal data we collect

We may collect the following categories of personal data about you:

- Your name and contact information such as your home or business address, email address and telephone number;
- Biographical information which may confirm your identity including your date of birth, tax identification number and your passport number or national identity card details, country of domicile and/or your nationality;
- An understanding of your goals and objectives in procuring our services;
- Information to assess whether you may represent a politically exposed person or money laundering risk.

The basis for processing your personal data (other than with your consent), how we use that personal data and whom we share it with

(i) Performance of a contract with you

We process your personal data because it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.

In this respect, we for instance use your personal data for the following:

- To prepare an invoice for you regarding the services we offer;
- To provide you with the services as set out in our relevant terms of engagement;
- To deal with any complaints or feedback you may have;
- For any other purpose for which you provide us with your personal data.

In this respect, we may share your personal data with or transfer it to the following:

- Your agents, advisers and/or intermediaries;
- Other companies in the Vistra Group whom we engage to assist in delivering the services to you;
- Third parties whom we engage to assist in delivering the services to you;
- Our professional advisers where it is necessary for us to obtain their advice or assistance, including lawyers, accountants, IT or public relations advisers;
- Other third parties such as intermediaries who we introduce to you. We will wherever reasonable possible tell you who they are before we introduce you;
- Our (software application and data centre) data storage and processing providers.

(ii) Legitimate interests

We may also process your personal data because it is necessary for our legitimate interests, or sometimes where it is necessary for the legitimate interests of another person.

In this respect, we for instance use your personal data for the following:

- For marketing to you. In this respect, see the separate section on Marketing below;
- Training our staff or monitoring their performance;
- For the administration and management of our business, including recovering money you owe to us, and archiving or statistical analysis;
- Seeking advice on our rights and obligations, such as where we require our own legal advice;

In this respect we may share your personal data with the following parties:

- Your agents, advisers and/or intermediaries;
- Other companies in the Vistra Group whom we engage to assist in delivering the services to you;
- Third parties whom we engage to assist in delivering the services to you;
- Our professional advisers where it is necessary for us to obtain their advice or assistance, including lawyers, accountants, IT or public relations advisers;
- Other third parties such as intermediaries whom we introduce to you. We will wherever reasonably possible tell you who they are before we introduce you;
- Other third parties in case of any court proceedings;
- Our (software application and data centre) data storage and processing providers;
- Third parties and their advisers where those third parties are acquiring, or considering acquiring, all or part of our business.

(iii) **Legal obligations**

We may also process your personal data for our compliance with any legal or regulatory obligation which we are under.

In this respect, we may for instance use your personal data for the following:

- To meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws;
- As required by tax authorities or any competent court or legal authority.

In this respect, we may share your personal data with the following:

- Our professional advisers where it is necessary for us to obtain their advice or assistance, including lawyers, accountants, IT or public relations advisers;
- Our auditors where it is necessary as part of their auditing functions;
- Other companies in the Vistra Group whom we engage to assist in delivering the services to you;
- Third parties whom we engage to assist in delivering the services to you;
- Our (software application and data centre) data storage and processing providers;
- Relevant regulators or law enforcement agencies where we are required to do so, or during court proceedings or litigation;
- Other third parties as may be applicable.

Marketing

We may from time to time send you marketing communications about the same or similar services we or any of our group companies provide, as well as other information in the form of alerts, newsletters and invitations to events or functions which we believe might be of interest to you.

We may communicate this to you in a number of ways including by post, telephone, email, SMS or other digital channels.

If you object to receiving marketing from us at any time, please contact us as outlined above, or click “Unsubscribe” in any marketing emails sent by us to opt out of such communication.

Data Transfers

When sharing your personal data with other parties as set out in this Privacy Notice, we may transfer your personal data across jurisdictions, and by using our services, you consent to us doing so. In doing so however, we comply with any applicable local laws or regulations in relation to such transfers.

To find out more about such transfers by us of your personal data, please contact us as outlined above.

Retention of your data

We will only retain your personal data for as long as we have a lawful reason to do so. In particular:

- where we collected your personal data as required by anti-money laundering legislation, including for identification, screening and reporting, we will normally retain that personal data after the termination of our relationship for as long as we are required by laws and regulations applicable to us, unless we are required to retain this information for a longer period of time for the purposes of court proceedings; or
- otherwise, we will in most cases retain your personal data for a period of seven (7) years after the termination of our contractual or other relationship with you in case any claims arise out of the provision of our services to you.