

Kerage Un Limited

(the *Company*)

DATA PROTECTION PRIVACY NOTICE

This notice is provided to enable you to better understand our processing of your personal data and prove our commitment to process your personal data in accordance with the Cayman Islands Data Protection Law, and any applicable, regulations and standards in the Cayman Islands.

Introduction

Confidentiality is intrinsic to the Company's business and we take data protection very seriously. For the purpose of compliance with the Cayman Islands Data Protection Law, this notice sets out how your personal data is processed. It also informs you of your rights regarding your personal data.

The Company is acting as a data controller with respect to your personal data. The Company is responsible for ensuring that your personal data is processed in compliance with the Cayman Islands Data Protection Law and to provide you with this notice.

Purposes of processing

The Company may process your personal data in accordance with the Cayman Islands Data Protection Law and solely for one or more necessary legal purposes (as described below).

In particular, the data supplied by you is processed for the purpose of:

- (a) providing coaching and/or consulting services to you;
- (b) complying with applicable anti-money laundering and counter terrorist financing rules, performing legal requirements under FATCA, the Common Reporting Standard (CRS) or similar laws and regulations;
- (c) communicating with you in the general course of business, including where applicable, decision making in relation to the Company, business strategy, monitoring and management of systems and improving products and services;
- (d) fulfilling the Company's contractual obligations with third parties;
- (e) internal and external audits and, where necessary, investigations or establishing, exercising or defending legal claims; or
- (f) the legitimate interests pursued by the Company, or by the third parties.

The above purposes are based on at least one of the following legal basis:

- (a) the processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- (b) the processing is necessary for compliance with a legal or regulatory obligation to which Company is subject;
- (c) the processing is necessary for the purposes of the legitimate interests pursued by the Company such as the better administration of its business so long as the rights of data subjects are not overridden; or
- (d) the data subjects have given their explicit consent (this basis is used only exceptionally).

Categories of personal data processed, Categories of data subjects

The Company may process the following categories of personal data:

- (a) identification data (eg name, surname, addresses, alias, place and date of birth, professional information, proof of identity (such as passport, photograph, identity card) and proof of address, results of fraud, criminal record checks, sanction screening, numeric data including tax identification numbers, bank details, signature, contact information, social security details and FATCA/CRS details, politically exposed persons checks and any other checks required by anti-money laundering and counter terrorist financing regulations on the investor and the relevant person(s));
- (b) professional data (eg position, company);
- (c) coaching, training, personnel data, personality test data in conjunction with the services we offer;
- (d) administrative data (eg language, tax identification numbers, bank details, signature, contact information, social security details); or
- (e) financial data (eg tax data, FATCA/CRS details, transactional data, investment preferences, investment history).

The Company will also process personal data relating to business contacts, staff of the Company's service providers and their service providers, authorised signatory lists, personnel employed by or who may become involved in a transaction/contract with the Company.

Sources of personal data

This data may be provided directly by you or, third party data sources or, through your authorised intermediaries, directors, officers, individual representatives (including, without limitation, legal representatives), trustees, settlors, signatories, shareholders, unitholders, investors, nominees or employees. The Company may also collate and hold data found from the results of internet searches and other sources in the public domain in the course of the client due diligence process and in providing the services that the Company is engaged to provide.

The Company processes or may process the following documents that may also contain your personal data: employment history, references, financial information, performance reviews, coaching evaluations, personnel records and surveys. In the course of your dealings with the Company you may provide us with further information; all of this information will be kept securely by us.

When the Company does not collect personal data directly from you, it must tell you the categories of personal data that it processes which have been collected from other sources. The Company processes the following categories of your personal data that are not collected directly from you:

- (a) professional/career data, personality test data;
- (b) identity/address and other information from sanctions screening, fraud prevention agencies or credit reference agencies.

The Company will notify you should any further personal data be collected from third parties.

Personal data provided to third parties

The manner in which the Company operates requires us to share, disclose or provide personal data to third parties to perform our contracts with third party service providers or at other times at your request or may be necessary for legal/regulatory reasons, such as anti- money laundering and counter terrorist financing laws and

regulations. Third parties may include any third party that provides services to the Company, professional advisors or any lender to the Company, including without limitation such third parties respective service providers, and any of the foregoing respective agents, delegates, affiliates, subcontractors and/or their successors and assigns generally.

A non-exhaustive list of potential disclosures includes:

- (a) collecting and sending documents when making an underlying investment,
- (b) collecting and sending documents for external audits;
- (c) collecting and sending documents for external audits of third party service providers;
- (d) publications onto the public record, such as companies registries or beneficial ownership registers;
- (e) publications with regulators;
- (f) FATCA/CRS filings onto approved external platforms;
- (g) sending information to external parties such as: services providers (including but not limited to MarketForce, vNacelle, Engagement Multiplier, QuickBooks, HubSpot, shcBOND, depositaries, notaries, administrators, domiciliation agents, banks, consultants, distributors, managers and other advisors (including, but not limited to, legal advisors), other financial intermediaries and professionals of the financial sector acting on behalf of the Company and providing services to the Company, and supervisory or governmental bodies.

Third parties and their respective service providers, directors or management bodies and the Company may require information on you for their own due diligence assessment and to comply with relevant laws and regulations, therefore we and our processors may share the information you provide to us with them for this purpose.

Summary of processing of personal data by third parties and transfer out of 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 Company outside the Cayman Islands.

Where personal data is transferred outside the Cayman Islands, the Company 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 the Company using the details set out below.

Retention and destruction of personal data

Your personal data will be kept securely by the Company. Your personal data will be held for the period stated in applicable law and/or for as long as is required to perform our contract with you after which it will be securely destroyed. We may keep it longer where:

- (a) there is litigation or an investigation;
- (b) where we are obliged to by any applicable law or regulation;

- (c) it may be required to assist with the mitigation of any future tax or regulatory query or enquiry into the transactions or other affairs undertaken by the Company; or
- (d) at your request (in which case there may be a charge).

Your rights

As a data subject you have further specific rights set out below, which you may choose to exercise:

- (a) the right to ask us to confirm whether or not we handle any personal data about you;
- (b) the right to ask us to provide you with copies of your personal data we hold;
- (c) the right to ask us to correct any inaccuracy or incompleteness in your personal data we hold;
- (d) the right to ask us to stop handling your personal data or to not begin the handling of your personal information;
- (e) the right to ask us not to subject you to automated decision-making that uses your personal data;
- (f) the right to object to us using your personal information for direct marketing purposes;
- (g) the right to lodge a complaint with the Cayman Islands Office of the Ombudsman.

Please note that the rights you have in respect of your personal data are not absolute and are subject to a range of legal conditions and exemptions.

If and to the extent a relevant legal condition or exemption applies, we reserve the right not to comply with your request. Additionally, while the rights you have can normally be exercised free of charge, the law allows us to charge you in certain limited circumstances. In such cases, we reserve the right to charge you a fee for processing your request.

Privacy Breaches

The Company takes the security of personal data very seriously. Nevertheless, should a privacy breach occur we will notify you directly as soon as possible following identification of the breach.

This notification will include the nature of the breach, its consequences, the measures proposed by the Company to address it and the measures recommended to you to mitigate its adverse effects.

Governing law and jurisdiction

This notice will be governed by and interpreted according to the laws of the Cayman Islands. All disputes arising under the note will be subject to the exclusive jurisdiction in the Cayman Islands.

Change to this notice

We may update this notice to reflect changes in the law or our privacy practice.

Contact information

If you have any questions or concerns about your personal data or this privacy policy or you wish to make a complaint about how we process your personal data, or you wish to exercise any of your rights as a data subject please contact the Company by email at info@kerage.com.

We are usually able to resolve privacy questions or concerns promptly and effectively. If you are not satisfied with the response you receive from us, you may escalate concerns to the Cayman Islands Office of the Ombudsman - <https://ombudsman.ky/data-protection>.