

Privacy Policy

Amnis Capital B.V.

Date of last modification: May 25th 2018

This Privacy Policy sets forth how Amnis Capital B.V, its subsidiaries and affiliates (referred to herein collectively as “Amnis” or “we”) collect, process and share personal information. Amnis provides this Privacy Policy to satisfy disclosure requirements required under data protection and privacy regulations adopted by regulatory authorities in the countries and regions, in which Amnis conducts business.

This Privacy Policy applies to visitors to this website (the “Site”), visitors to our offices, individuals who call Amnis personnel in certain of our offices, third-party service providers, vendors and suppliers, business contacts and prospective clients and investors. Amnis provides separate privacy notices to other categories of individuals, such as current clients and investors, job applicants, and persons connected with underlying investments of Amnis funds and as such information regarding these categories of individuals is not included here.

When visiting the Site, it is important to review this Privacy Policy carefully and in conjunction with the Terms of Use of the Site, which detail important information related to use of the Site. The Site is not intended for use by children under the age of 13. We do not knowingly collect information from or relating to children.

Collection of Personal Information

Website Visitors

Depending on use of the Site, we may need the following information:

- to contact us: name, address, e-mail address, telephone number and other contact details along with any other information you choose to provide;
- to login to our investor portal - username and password; and

For information on technology and cookies used on the Site, see the section entitled “Use of Technology and Cookies” below.

Office Visitors and Callers

When you visit Amnis offices or call with certain Amnis employees, we may collect certain personal information such as:

- name, organization and other contact details;
- video images of you in certain areas of the buildings in which our offices are located from CCTV footage;
- date and time of your visit to Amnis offices; and
- voiceprints and telephone numbers during the recording of telephone calls.

Third-Party Service Providers, Vendors and Suppliers

In the process of engaging third-party service providers, vendors and suppliers, Amnis may collect certain personal information about them and/or about their individual representatives and associates including:

- name, job title, telephone number, email address and other contact details;



- the name of the third-party service provider, vendor or supplier with whom you are associated and its address; and
- information required to process payments, such as a tax I.D. numbers and wire transfer instruction details.

Business Contacts and Prospective Clients and Investors

Amnis may collect personal information about individuals or representatives of organizations with whom Amnis has a business relationship (or with whom Amnis seeks to establish a business relationship), as well as prospective investors. Such information may include:

- name, address, telephone number, email address and other contact details;
- organization name and address, job title; and
- investor type, strategy, product and communication preferences (if you choose to receive marketing communications, you will have the option to opt out of receiving such communications at any time by contacting us or unsubscribing via a link in the particular communication).

Use of Personal Information

Personal information will be processed: (i) in order to comply with our legal and regulatory obligations; (ii) because we need the information in order to comply with our obligations under contract; and/or (iii) because we have a legitimate business interest in processing it, including for the following purposes (as applicable):

- respond to questions and handle and resolve complaints;
- perform research with respect to the usage of the Site (applicable to website visitors);
- personalize and enhance website experience (applicable to website visitors);
- maintain the security of our premises, personnel, assets, systems and intellectual property and to manage access to our premises and our disaster recovery procedures (applicable to office visitors);
- pay for services (applicable to third-party service providers, vendors and suppliers);
- comply with our obligations in connection with record-keeping requirements and applicable anti-money laundering, anti-corruption and bribery, terrorism financing rules, sanctions, and the prevention and detection of crime or other applicable laws or regulations of jurisdictions in which Amnis conducts business (applicable to office callers, third-party service providers, vendors and suppliers);
- maintain and provide appropriate management of our relationships;
- engage services in the future (applicable to third-party service providers, vendors, suppliers and business contacts);
- contact to set up meetings and/or phone calls with us or our business contact(s); and
- send marketing communications about Amnis (if you choose to subscribe, you will have the option to opt out of receiving such marketing communications at any time by contacting us or unsubscribing via a link in the particular communication) (applicable to website visitors, business contacts and prospective clients and investors).

Where required by applicable law, we will obtain prior consent before sending you direct marketing communications.

For information on how we use and process technology and cookies on the Site, see the section entitled "Use of Technology and Cookies" below.





Where Amnis is relying on its legitimate interests as the ground for processing your personal information, we must carry out an assessment to ensure our interests do not override any rights you may have.

Sharing and Transfer of Personal Information

We may share the personal information we store with:

Amnis affiliated entities (within and outside the EEA);

Third-party service providers, vendors, contractors, and agents of Amnis as part of normal business operations, including providers:

- of accounting, banking and other data processing services;
- of information technology services and platforms/applications;
- of call recording and storage services (applicable to office callers);
- third party outsourcing providers;
- building security personnel (applicable to office visitors);
- third parties acting on your behalf such as consultants and other agents;
- governmental authorities and/or law enforcement officials where required;
- financial institutions to wire payments (applicable to third-party service providers, vendors and suppliers); and
- advisors who provide audit, financial and legal advice to Amnis.

Amnis may also disclose your personal information to particular parties pursuant to your express consent, to fulfill your instructions, to comply with applicable laws and regulations or to fulfil other applicable requirements.

Personnel employed by service providers generally may have access to your personal information for the purpose of performing duties for Amnis but are prohibited from using such information for other purposes.

Personal information may be transferred to or shared with entities located in the United States, the European Union or in other countries which are deemed to offer an adequate level of protection, or in countries where data protection laws might not exist or be of a lower standard than in the European Union. This includes the transfer of personal information among the Amnis subsidiary and/or affiliated entities and the jurisdictions in which they operate. As of the date of this notice, Amnis has affiliates within the European Economic Area (EEA), as well as affiliates in the United States, Hong Kong, Singapore (see the "Contact" page of the Site for a listing). In addition, we may transfer or share your personal information with non-affiliated parties located in the same jurisdictions as Amnis entities as well as other jurisdictions and information may be stored and processed manually and electronically through global systems and tools for the purposes outlined in this Privacy Policy.

When transferring personal information from within the EEA to countries outside the EEA, we comply with European Union law by using Standard Contractual Clauses approved by the European Commission or by adopting other means to ensure that adequate safeguards are applied (including, where relevant, transfers to a recipient with an appropriate Privacy Shield certification). If you would like more information on how we comply with transfer requirements please contact us.

Safeguarding of Personal Information

Amnis maintains established internal policies and procedures as well as physical and electronic safeguards that comply with applicable standards to safeguard access to personal information in our





possession from accidental or unlawful destruction, loss, alteration, unauthorized use or disclosure. We endeavor to limit access to personal information about you to those employees, agents and other authorized parties who need to know the information to enable Amnis to provide products or services to you. Please note that such safeguards, however, do not guarantee that personal information transmitted via the Internet or stored in our systems or is otherwise under Amnis' care will be absolutely safe from unauthorized use or intrusion from third parties due to the inherent nature of the Internet.

Retention of Personal Information

Personal information stored by Amnis is generally retained for a period of ten years from (a) the date the data record was created or (b) a particular trigger event depending on the type of data record containing the personal information. Examples of trigger events are (i) the tax filing year in which an invoice for services received is paid, (ii) date of contract expiration or termination, and (iii) account closure or fund dissolution date.

Your Rights

The rights described in this paragraph are applicable to you only if you reside in a jurisdiction where the provision of such rights is required by the data protection and privacy laws and regulations of the governing regulatory authority. As such, where required by applicable law or regulation, you may ask Amnis for a copy of your personal information, to correct it, to erase it or to transfer it to other organizations. You may also have rights to object to some processing and, where we have asked for your consent to process your personal information, to withdraw this consent. In particular, you have rights to object to direct marketing at any time.

You should also be aware that these rights may be limited (for example, access to personal information may be denied if making the information available would reveal personal information about another person or if we are legally prevented from disclosing such information). In addition, Amnis may be able to retain data even if you withdraw your consent, where we can demonstrate that we have a legal requirement to process your personal information. Where we must collect and process personal information in order to comply with applicable law or enter into and perform services under an agreement with you, if you do not provide the personal information we may not be able to enter into the agreement or provide services as contemplated by any agreement we have in place. Where we are not able to fulfil a request you make because your rights are limited, we will inform you of the reasons as to why when responding.

Should you have any questions or requests in relation to your rights, please email info@amniscapital.com. We will attempt to deal with all requests at the earliest opportunity. In addition, if you have unresolved concerns you have the right to complain, where permitted, to competent data protection authorities.

Use of Technology and Cookies

Amnis may collect certain information through the use of technology, such as cookies. Cookies are pieces of information, or files, placed on your device's disk that provide information including how and when pages on the Site are accessed by users. To find out more about cookies please visit www.allaboutcookies.org, or see www.youronlinechoices.eu which contains further information about behavioral advertising and online privacy.

We use the following types of cookies on our Site:

info@amniscapital.com
www.amniscapital.com





Required Cookies - These cookies are essential in order to enable you to move around the Site and use its features. Without these cookies, services, such as remembering your login details, cannot be provided.

Analytics Cookies - These cookies remember choices you make, such as the duration of your session. These can then be used to provide you with an experience more appropriate to your selections and to make the visits more tailored and pleasant. The information these cookies collect may be anonymized (such as the IP address through which you visit the Site) and they cannot track your browsing activity on other websites. Amnis uses a Google Analytics cookie to collect this information; you have the right to opt-out of having the Google Analytics cookie placed on your browser.

You may configure your browser to set preferences regarding cookies such that you can have your computer warn you each time a cookie is sent. Note that you may decline placement of cookies if your internet browser permits, though this may impact your experience of using the Site, and certain portions of the Site may be inaccessible to you if you choose to do so. You may at any time delete any cookies from your hard drive. Aggregated data gathered from cookies is used by Amnis to help maintain and improve the information provided on the Site for users. Amnis may also employ other technical methods to track and analyze the traffic patterns on the Site, such as the frequency with which users visit various parts of the Site. These technical methods may involve the transmission of information either directly to us or to another party authorized by us to collect information on our behalf. We take seriously the protection of your personal information and have contracts in place with these authorized third parties to protect your personal information. We may also use these technical methods in HTML e-mails that we send Site users to determine whether such users have opened those e-mails and/or clicked on links in those e-mails. Amnis may collect the information from use of these technical methods in a form that is personally identifiable.

During some Site visits, Amnis may use software tools such as JavaScript to measure and collect session information, including page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouseovers), and methods used to browse away from the page. Amnis may use this information to measure Site activity, to develop ideas for improving the Site and for any other purpose to the extent permitted by applicable law.

Links to Third-Party Websites

The Site may contain links to third party websites which, in some cases, may be integrated into, and appear to be part of, the Site. Amnis encourages you to read the privacy policies of other websites you link to from this website and disclaims any responsibility for the privacy policies and procedures of any third party websites that you reach via a hyperlink contained on the Site. Such hyperlinks are provided for your convenience only, and you access them at your own risk.

Updates to this Privacy Policy

Amnis reserves the right in its sole discretion to modify or amend this Privacy Policy in any way at any time. Any such changes are effective upon posting and we will indicate in the Privacy Policy when it was most recently updated. You should review this Privacy Policy periodically for changes applicable to you. Additionally, note that by accessing subsequent to any modification, you are deemed to have agreed to all terms of this Privacy Policy as modified or amended.

Contact Us

info@amniscapital.com
www.amniscapital.com





Please direct any questions regarding Amnis' Privacy Policy to
info@amniscapital.com.
Amnis Capital B.V.

This Privacy Policy is dated May 24, 2018

