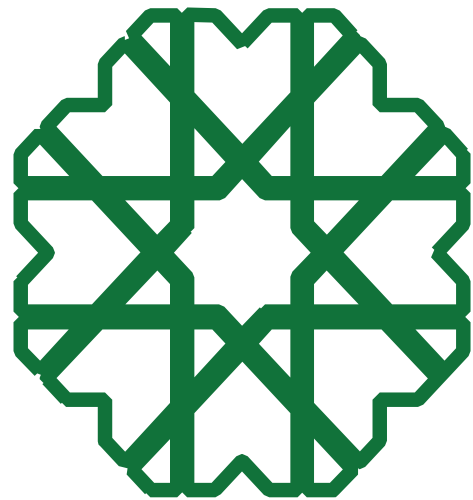


OASIS CRESCENT



WEALTH (UK) LTD.

PRIVACY POLICY



This privacy statement sets out the Privacy Policy for Oasis Crescent (UK) Limited (“OCUK”) including its subsidiaries Oasis Crescent Wealth (UK) Limited (“OCW UK”) and Oasis Global Management Company (Ireland) Limited (“OGMCI”), which are hereinafter as (“the company”) individually and collectively.

INFORMATION ABOUT US

Oasis Crescent (UK) Limited is the holding company of Oasis Crescent Wealth (UK) Limited and Oasis Global Management Company (Ireland) Limited

In accordance with the Data Protection Act 2018, Oasis Crescent (UK) Limited, with its registered office located on the 3rd Floor, 50 Hans Crescent, Knightsbridge, London, SW1X 0NA, registered in the Information Commissioner’s Office (ICO) UK Data Controller Registry with the Registration Number ZA336713 as a data controller including its subsidiaries Oasis Crescent Wealth (UK) Limited (“OCW UK”) registered in the Information Commissioner’s Office (ICO) UK Data Controller Registry with the Registration Number Z3181378 as a and Oasis Global Management Company (Ireland) Limited (“OGMCI”) registered in the Data Protection Commissioner’s Data Controller Registry with the Registration Number 8258/A as a data controller and data processor.

The Company’s have entered in to a business process outsourcing agreement with its global partner company, Oasis Group Holdings (Pty) Limited, in terms of which Oasis Group Holdings (Pty) Limited is appointed to render services for and on behalf of the company. Pursuant to this appointment, the company may be required to share your personal data with Oasis Group Holdings (Pty) Limited.

We are committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will process it.

1 What does this policy cover?

- 1.1 The privacy policy applies where we are acting as a data controller or data processor or both with respect to the personal data of our existing, prospective and former clients.
- 1.2 In this policy, “we”, “us” and “our” refer to OCUK and its subsidiary Oasis Crescent Wealth UK Limited. For more information about us, see Section 11.
- 1.3 This policy covers what personal data is collected, why we are collecting it, how we are using it, what are our lawful bases of processing your personal data, disclosure of your personal data to third parties including international transfers, our data retention policy for your personal data and your rights as data subject under Data Protection Act 2018.
- 1.4 We reserve the right to amend this privacy policy from time to time without any prior notice.
- 1.5 We will always comply with the Data Protection Act 2018 when dealing with your personal data. Further information can be found at the Information Commissioner’s Office (ICO) UK’s website: www.ico.org.uk

2 What information is collected?

- 2.1 Section 2.1 outlines the types of personal data being processed. The Data Protection Act 2018 defines personal data as the following:

‘Any information relating to an identified or identifiable living individual (‘data subject’). “Identifiable living individual” is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data or an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that living individual.’

There is stronger legal protection for more sensitive information, such as race, ethnic background, political opinions, religious beliefs, trade union membership, genetics, and biometrics (where used for identification), health, and sex life or orientation.

- 2.2 Other data may be collected through email or other electronic correspondence, by telephone, by direct contact, or if you voluntarily submit it, except where we are required by law to collect personal data (for example, to comply with money laundering regulations) in which case the provision of personal data is mandatory. We may not be able to provide the services you request where you fail to give us with such required information.



- 2.3 We only collect information that is relevant to our services and necessary to identify you. We may also ask you for information when you make a request to exercise your rights under the Data Protection Act 2018, see **Section 9**.
- 2.4 The Following personal data will be collected about you:
- First Name
 - Surname
 - Tax Identification Number
 - ID/Passport Number
 - Guardian Details (if applicable)
 - Occupation
 - Religion
 - Gender
 - Marital Status
 - Date of Birth
 - Tel/Cell
 - Email Address
 - Residential Address
 - Country of Domicile
 - Source of Funds
 - Bank Details
- 2.5 The following sensitive data may be collected from you, if you are a politically exposed person (PEP):
- Jurisdiction
 - Position/Title
 - Date of Appointment
 - Duration

3 Why and how are we using your personal information?

- 3.1 In this Section 3, we have set out:
- (a) the purposes for which we may process personal data;
 - (b) the lawful basis of such processing; and
 - (c) meeting our legal and regulatory obligation.

3.2 Oasis Crescent Wealth (UK) Limited

3.2.1 Administering & Managing your relationship with the company

- **Purpose:** The personal data collected from you will be processed for administering and/or managing your relationship and/or account(s) with the company in the day to day running of our business.
- **Lawful Basis:** The lawful basis for processing of your personal data for administering and/or managing your relationship with the company is performance of a contract.

3.2.2 Opening of Investment Accounts

- **Purpose:** The account data may be processed for the purpose of provision of our services and products or communicate with you about your account(s).
- **Lawful Basis:** The lawful basis for processing of your personal data for opening of investment account with the company is performance of a contract.

3.2.3 Maintaining & Monitoring your products and services

- **Purpose:** We continuously update and monitor personal data to ensure that is secure, accurate and up to date.
- **Lawful Basis:** The lawful basis for processing of your personal data to deliver you the best client's services is for the performance of a contract.

3.2.4 Processing Application Forms

- **Purpose:** The account data may be processed for the purpose of performance of the contract and provision of our products and services.
- **Lawful Basis:** The processing of your personal data for the purpose of processing application forms is necessary for the performance of a contract.

3.2.5 **Anti-money Laundering (AML) checks**

- **Purpose:** The European Union's Fourth Anti-Money Laundering Directive came into force on 26th June 2017. The Fourth Money Laundering Directive ((EU) 2015/849) (MLD4) is designed to strengthen the EU's defenses against money laundering and terrorist financing, while also ensuring that the EU framework is aligned with the Financial Action Task Force's (FATF), international Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) standards. The AML regulations are governed by 4 Acts: The Proceeds of Crime Act, The Serious Organized Crime and Police Act, The Terrorist Act and the Money Laundering Regulations. Therefore, when you apply for our products or services, it is crucial for us to conduct your AML check before we accept you as our client because our failure to report suspicious activity can carry a criminal sentence and lead to substantial fines to the company from the relevant regulatory body.
- **Lawful Basis:** The processing of your personal data for AML is our legal obligation and legitimate interest in order to comply with the applicable regulation and protect the interest of our business respectively.

3.2.6 **Related Tax Disclosures**

- **Purpose:** To meet the legal requirement of timely submission to all the relevant authorities requiring the submission of client data collected through FATCA and CRS self-certification service as required by the relevant jurisdiction(s) for tax disclosure purposes.
- **Lawful Basis:** To ensure compliance with all the relevant income tax and automatic exchange of information legislation (FATCA & CRS).

3.2.7 **Marketing Communication**

- **Purpose:** We may use your personal data to contact you, primarily by email and telephone, so that we can provide you with information concerning products and services that may be of interest.
- **Lawful Basis:** The processing of your personal data for marketing communication is based on your consent. If you do not wish to receive marketing communication, you can opt out at any time by writing to us at or by electronically unsubscribing from emails we have send to you.

3.2.8 **Service Enhancements**

- **Purpose:** We may use your personal data to conduct surveys with the aim of improving our products or services and decide/recommend how our products or services might be suitable for you.
- **Lawful Basis:** The personal data collected from you for service enhancement will only be processed upon receiving your consent.

3.2.9 **Mandatory Communication**

- **Purpose:** We may use your personal information to deliver mandatory communications to clients or communicate updates related to our products and services' terms & conditions.
- **Lawful Basis:** The lawful basis for delivering mandatory communications is our legal obligation.

3.3 **Oasis Global Management Company (Ireland) Limited**

3.3.1 **Opening of Investment Accounts**

- **Purpose:** The account data may be processed for the purpose of provision of our products and services or communicate with you about your account(s).
- **Lawful Basis:** The lawful basis for processing of your personal data for opening of investment account with the company is performance of a contract.

3.3.2 **Processing Application Forms**

- **Purpose:** The account data may be processed for the purpose of performance of the contract and provision of our services.
- **Lawful Basis:** The processing of your personal data for the purpose of processing application forms is necessary for the performance of a contract.

3.3.3 **Anti-money Laundering checks**

- **Purpose:** The European Union's Fourth Anti-Money Laundering Directive came into force on 26th June 2017. The Fourth Money Laundering Directive ((EU) 2015/849) (MLD4) is designed to strengthen the EU's defenses against money laundering and terrorist financing, while also ensuring that the EU framework is aligned with the Financial Action Task Force's (FATF), international Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) standards. The AML regulations are governed by 4 Acts: The Proceeds of Crime Act, The Serious Organized Crime and Police Act, The Terrorist Act and the Money Laundering Regulations. Therefore, when you apply for our products or services, it is crucial for us to conduct your AML check before we accept you as our client because our failure to report suspicious activity can carry a criminal sentence and lead to substantial fines to the company from the relevant regulatory body.
- **Lawful Basis:** The processing of your personal data for Anti-Money Laundering (AML) checks is our legal obligation legitimate interest in order to comply with the applicable regulation and protect the interest of our business respectively.

3.3.4 **Related Tax Disclosures**

- **Purpose:** To meet the legal requirement of timely submission to all the relevant authorities requiring the submission of client data collected through FATCA and CRS self-certification service as required by the relevant jurisdiction(s) for tax disclosure purposes.
- **Lawful Basis:** To ensure compliance with all the relevant income tax and automatic exchange of information legislation (FATCA & CRS).

3.3.5 **Marketing Communication**

- **Purpose:** We may use your personal data to contact you, primarily by email and telephone, so that we can provide you with information concerning products and services that may be of interest.
- **Lawful Basis:** The processing of your personal data for marketing communication is based on your consent. If you do not wish to receive marketing communication, you can opt out at any time by writing to us at or by electronically unsubscribing from emails we have send to you.

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3.3.7 **Mandatory Communication**

- **Purpose:** We may use your personal information to deliver mandatory communications to clients or communicate updates related to our products and services' terms & conditions.
- **Lawful Basis:** The lawful basis for delivering mandatory communications is our legal obligation.

3.4 **Meeting our legal & regulatory obligations**

- 3.4.1 The company collects, verify and keep your personal data up to date in order to comply with its legal and regulatory obligations. We are required under US Foreign Account Tax Compliance Act (FATCA) and the Organization for Economic Cooperation & Development (OECD) Common Reporting Standards (CRS) to seek answers to certain questions in order to identify the accounts reportable to the tax authorities in relevant jurisdiction(s).

4 **Will your personal information be disclosed to any third parties?**

4.1 **Non-Affiliated Third Parties**

As a matter of policy, the company does not disclose any clients' personal information to non-affiliated third parties except as required or permitted by law or as necessary for such third parties to perform their agreements with respect to the company.

The company reserves the right to disclose or report personal or account information to non-affiliated third parties, where the company believes that such disclosure is required under law or agreement, to cooperate with regulators or law enforcement authorities in order to protect your rights or property.

4.2 **Affiliated Third Parties**

The company will share your personal information with their affiliates subject to the applicable laws and lawful bases of the company.

Oasis Crescent Wealth (UK) Limited

- 4.2.1 We may share your data with related companies in our Group. This includes our holding company and subsidiaries;
- 4.2.2 We may disclose your data to our Funds Distributors;
- 4.2.3 We may disclose your data to our external auditors;
- 4.2.4 We may disclose your data to Government bodies including HM Revenue & Customs (HMRC);
- 4.2.5 We may disclose your data to regulatory bodies including Information Commissioner's Office (ICO UK) and Financial Conduct Authority (FCA);
- 4.2.6 We may disclose your data under US Foreign Account Tax Compliance Act (FATCA) and the Organization for Economic Cooperation & Development (OECD) Common Reporting Standards (CRS);
- 4.2.7 We may disclose your data to Oasis Group Holdings (Pty) Limited.
- 4.2.8 We may disclose your data to Financial Advisors;
- 4.2.9 We may disclose your data to fraud prevention agencies.

Oasis Global Management Company (Ireland) Limited

- 4.2.10 We may share your data with related companies in our Group. This includes our holding company and subsidiaries;
- 4.2.11 We may disclose your data to our service providers and custodian;
- 4.2.12 We may disclose your data to our external auditors;
- 4.2.13 We may disclose your data to Government bodies including Revenue Commissioners;
- 4.2.14 We may disclose your data to regulatory bodies including Office of Data Protection Commission and Central Bank of Ireland (CBI);
- 4.2.15 We may disclose your data under US Foreign Account Tax Compliance Act (FATCA) and the Organization for Economic Cooperation & Development (OECD) Common Reporting Standards (CRS);
- 4.2.16 We may disclose your data to Oasis Group Holdings (Pty) Limited;
- 4.2.17 We may disclose your data to fraud prevention agencies.

The company may share your data with third parties to meet any applicable law, regulation or any lawful request. In certain circumstances, where we discover that we have provided with misleading or false information or we suspect any criminal activity, we will report such information to law enforcement agencies both within and outside EU.

5 Will your personal information be transferred outside the United Kingdom and/or the European Economic Area?

- 5.1 In Section 5, we have provided information about the circumstances in which your personal data may be transferred to countries outside the United Kingdom and/or the European Economic Area.
- 5.2 We transfer your personal data outside the United Kingdom and/or the European Economic Area to help us provide your products and services.
- 5.3 The company has inter-group data sharing arrangements, based on EU Commission approved standard contractual clauses, with its group partner companies namely Mylie Holdings Limited based in Mauritius and it's global partner company Oasis Group Holdings (Pty) Ltd based in South Africa. These standard contractual clauses provide specific contractual protections designed to ensure that your personal data is subject to adequate and consistent level of protection when transferred outside EEA.
- 5.4 We will always take extra steps to ensure that any international transfers to each of these countries are protected under appropriate safeguards.

6 How secure is your personal data?

- 6.1 We take seriously the obligation to protect and safeguard your personal data with us and with the third parties acting on our behalf.
- 6.2 In addition to this policy, we have implemented procedures that are specifically designed to restrict access to your personal data to authorized personnel and staff that require such information to perform their jobs such as processing your instructions for subscriptions and redemptions. Furthermore, we have implemented adequate physical, technical and procedural measures to safeguard your personal data.

7 Children's Data

- 7.1 We are concerned regarding the safety of the personal data related to minors (children under 16 years of age or other age defined under applicable law) and where consent has given by parent or guardian, we will make reasonable efforts to verify that person actually hold parental responsibility for the child.



8 What are our data retention practices?

- 8.1 By providing you our services and products, the company creates records which could contain your information such as client account records, transactional records and tax records. Records can be held in both electronic and physical form.
- 8.2 We will collect your personal data for transactional purposes and retain such data for statistical or regulatory purposes.

9 What are your rights?

- 9.1 Your principal rights under data protection law are:
- 9.1.1 the right to access;
 - 9.1.2 the right to rectification;
 - 9.1.3 the right to erasure;
 - 9.1.4 the right to restrict processing;
 - 9.1.5 the right to object to processing;
 - 9.1.6 the right to data portability;
 - 9.1.7 the right to complain to a supervisory authority; and
 - 9.1.8 the right to withdraw consent
- 9.2 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
- (a) the payment of a fee (currently fixed at GBP 10, if you opt to receive via postage); and
 - (b) the supply of appropriate evidence of your identity
- 9.2 You have the right to have any inaccurate personal data about you corrected and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 9.3 In some circumstances you have the right to the erasure of your personal data without undue delay. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary such as for compliance with a legal obligation or for the contractual agreements.
- 9.4 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection.
- 9.5 You have the right to object to our processing of your personal data for direct marketing purposes
- 9.6 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time for marketing communication. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 9.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defense of legal claims.
- 9.8 To the extent that the legal basis for our processing of your personal data is:
- 9.8.1 consent; or
 - 9.8.2 that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract and such processing is carried out by automated means; you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 9.9 You may exercise any of your rights in relation to your personal data by completing the form available on our website at: www.oasiscrest.co.uk

10 Updates to this Policy

The company may change this privacy policy from time to time to reflect any changes to our privacy practices in accordance with the changes in data protection legislations or best practices. The company reserves the rights to amend this privacy policy at any time, which shall be effective from the date of publish.

11 How can you find out more?

Our Data Protection Officer oversees how we collect, use, share and protect your information to ensure your rights are protected. Please address any questions, comments and requests regarding our data processing practices to our Data Protection Officer at DPO@oasiscrest.com