

**External (i.e., Clients) Data Protection Policy & Privacy Notice for Sera Global****1. Introduction**

This is the client data protection policy and privacy notice (“Policy”) for Sera Global (as defined below). This Policy applies to clients (as defined below).

At Sera Global, we respect Your privacy, and this Policy governs how Sera Global collects, processes and uses Your Personal Data (as defined below). For the purposes of certain data protection and privacy laws, Sera Global acts as a controller in respect of Your Personal Data.

The purpose of this Policy is to tell You what to expect Sera Global to do with Your Personal Data when You contact us or use one of our services. The Policy sets out the essential information such as the what, where, when and how Your Personal Data is collected. The information in this Policy should help You to feel more confident about the privacy and the security of Your Personal Data which Sera Global collects and uses.

Please read this Policy carefully. This Policy may change from time to time and You should review it periodically. The most recent version of this Policy can be found on the Sera Global website (<https://www.seraadvisory.com/>) (“Sera Global Website”) [<https://www.seraadvisory.com/terms-privacy-policies#legal-external-data-protection-policy>]

**This Policy was last updated 1<sup>st</sup> February 2021.**

**2. Definitions**

The following definitions shall apply to this Policy:

**"Sera Global", "we", "us", "our"** means the Sera Global entities and Sera Global affiliated entities listed in Appendix A.

**"Client"** means an individual or entity that uses Sera Global for advisory services or uses Sera Global as an intermediary to deploy their capital in a managed investment vehicle that Sera Global is helping to raise money for.

**"Personal Data"** has the meaning given in applicable data protection legislation (and for the purposes of California residents means ‘Personal Information’ as defined under the California Consumer Privacy Act) and for the avoidance of doubt means any information which directly or indirectly identifies a natural living person, which is in the possession of, or likely to come into the

possession of, Sera Global (or its representatives or service providers). Such personal data includes name, an identification number, email address, address, telephone number, location data, financial data, or an online identifier of that natural person. In addition to factual information, it includes any expression of opinion about an individual and any indication of the intentions of Sera Global or any other person in respect of an individual.

**"You", "Your"** means a living individual, who may be:

- a) A Client or prospective Client; or
- b) an employee, director, officer, trustee, beneficiary, or representative or intermediary of a Client or prospective Client.

### **3. What Personal Data does Sera Global collect and why?**

We will collect Personal Data from You when You register with Sera Global, apply to use any of Sera Global services, become a Sera Global Client, or contact Sera Global in person, by telephone, by email or by post.

We also collect Personal Data from You when You provide feedback or complete a contact form on the Sera Global Website. Please see the Sera Global Website Terms of Use [<https://www.seraadvisory.com/terms-privacy-policies#legal-terms-of-use>], Sera Global Website Privacy Policy [<https://www.seraadvisory.com/terms-privacy-policies#legal-data-protection-policy>] and Sera Global Cookies Policy [<https://www.seraadvisory.com/terms-privacy-policies#legal-cookie-policy>] for further information about how we collect and use Your Personal Data when You use the Sera Global Website.

We may collect information about You from fraud prevention agencies and other organisations when we undertake checks such as identification verification checks, as explained further below.

Many of the services offered by Sera Global require us to obtain Personal Data about You in order to perform the services we have been engaged to provide, and to comply with applicable law or policies (for example, Know Your Client and Anti-Money Laundering). In connection with the provision of those services, Sera Global will collect Personal Data about You:

- a) directly from You;
- b) from a third party acting on Your behalf, for example an intermediary, lawyer, or service provider;
- c) from other Sera Global entities;
- d) from publicly available sources;
- e) from other organizations; and
- f) when we generate it ourselves.

Such Personal Data may include (by way of non-exhaustive list):

- a) details of Your name, age, date of birth, address, gender, nationality, citizenship and contact information;
- b) financial information or other information obtained as a result of Your investment in any of the funds we are helping raise capital for (such as advisor details, investment details, banking details, and financial details);
- c) Your national insurance, National Health Service number, Medicare or social security number or other tax identification number and details of tax residency for any tax implications;
- d) data provided by You in the context of us carrying out background checks, anti-money laundering, regulatory, tax and 'Know Your Client' checks (such as data included in identification documents, details of criminal records and sanctions);
- e) a file with Your contact history
- f) information relating to the services we provide to our Clients or prospective Clients; and
- g) information required as a result of legal, tax and regulatory requirements or internal policies.

Please note that if You do not provide certain Personal Data to Sera Global when requested (and where relevant, provide Your consent), we may not be able to provide You with some or all of our services and products (including those set out in this Policy or in other agreements we enter into with You).

#### **4. How Sera Global uses Your Personal Data**

Your Personal Data may be collected, stored, disclosed and processed by Sera Global for the following purposes:

- I. to provide You with marketing communications and inform You about news and information relating to our business and services, including new product launches, product updates and general business news;
- II. to assess Your application for Sera Global's products and services, where applicable;
- III. to understand Your needs and interests and to respond to Your enquiries;
- IV. to analyze and improve our services;
- V. for the management and administration of our business;
- VI. to provide You with the products and services for which You subscribe;
- VII. to comply with and in order to assess compliance with applicable laws, rules and regulations (including tax reporting purposes pursuant to tax legislation), industry codes, voluntary codes we decide to adopt, or good practice, anywhere in the world and internal policies and procedures;

- VIII. to confirm and verify Your identity and to conduct due diligence, background and related checks (this may involve the use of a credit reference agencies and/or other third parties acting as our agents to conduct these verifications and related reviews including screens against publicly available government and/or law enforcement agency sanctions lists);
- IX. to detect, investigate and prevent fraud and other crimes or malpractice;
- X. for the purpose of, or in connection with, any legal proceedings (including prospective legal proceedings);
- XI. to obtain legal advice or to establish, exercise or defend legal rights;
- XII. the administration and maintenance of databases storing Personal Data;
- XIII. to comply with our contractual obligations; and
- XIV. for purposes otherwise set out in this Policy or as notified to You at the specific time of collection.

Sera Global is entitled to use Your Personal Data for the purposes listed above because one or more of the following legal bases applies:

- a) Sera Global needs to do so in order to perform its contractual obligations to You (for example, in order to manage Your investments, and verify the information You provide);
- b) Sera Global has obtained Your specific and informed consent (which may include written consent) in accordance with applicable data protection and privacy laws unless an exemption provided under applicable law permits the use and disclosure of Your Personal Data without Your consent.
- c) Sera Global has legal or regulatory obligations that must be discharged;
- d) Sera Global may need to do so in order to establish, exercise or defend its legal rights or for the purpose of legal proceedings;
- e) there may be certain exemptions provided under applicable laws which permit the use and disclosure of Your Personal Data without Your consent; or
- f) the use of Your Personal Data as described is necessary for Sera Global's legitimate business interests or the legitimate interests of a third party provided such interest are not overridden by Your rights or interest, including:
  - i. allowing Sera Global to effectively and efficiently, administer and manage the operation of its business;
  - ii. maintaining compliance with internal policies and procedures;
  - iii. monitoring the use of our copyrighted materials; or
  - iv. for internal research purposes.

If You are located in a jurisdiction which requires us to obtain Your consent to collect, use, store, process and disclose Your Personal Data, You understand that by accepting the terms of this Policy You expressly provide Your consent to Sera Global collecting, using, storing, processing and disclosing Your Personal Data as set out in this Policy.

To the extent permitted by applicable law, we may record and/or monitor electronic communications (including email and telephone) to ensure compliance with our legal and regulatory obligations and internal policies and for the purposes outlined in this Policy.

#### **5. Special Category and Sensitive Data**

Certain forms of Personal Data are subject to specific protection or restriction by law in certain territories. Depending on the jurisdiction, "Special Category" or "Sensitive" data can include data relating to racial or ethnic origin, or communal origin, political opinions, religious or philosophical beliefs, trade union membership information, genetic data, biometric data, and data concerning health or sex life or sexual orientation, data relating to criminal activity or proceedings, passwords, and financial information such as bank account details, credit card and debit card details.

We will not process Your Special Category or Sensitive data unless such processing is compliant with applicable data protection and privacy laws.

#### **6. Disclosure of Your Personal Data to Third Parties**

Sera Global does not sell Personal Data to third parties. Sera Global may share or provide access to Your Personal Data among its affiliates and business units and third-party agents, service providers and contractors outside of Sera Global:

- I. for the purpose of the management and administration of Sera Global's business;
- II. in order to facilitate the provision and enhancement of services to You (including the management of Your investments);
- III. for the purpose of the administration and maintenance of the databases storing Personal Data;
- IV. for the purposes of Sera Global receiving services (for example, Sera Global's accountants, administrators, auditors, service providers, custodians, depositories, third party managers, paying agents, professional advisors, IT and communications providers or any entity we reasonably consider necessary for the purposes outlined above). These third parties are expected to be subject to confidentiality requirements (either by contract, professional obligation, duty or otherwise) that require them to only use Your Personal Data as described above;
- V. to the extent required by law (for example, if Sera Global is compelled by an obligation or a duty to disclose Your Personal Data where we believe it is necessary or appropriate to

comply with any legal obligation, rule, regulations or internal Sera Global policies and procedures, including (without limitation) in order to comply with tax reporting requirements and other statutory reporting and disclosures to regulatory authorities), or to establish, exercise or defend its legal rights. This may include disclosure to regulatory bodies or government agencies);

- VI. as part of a transaction, financing, or for other business needs (for example, if Sera Global sells any of its businesses or assets, applies for a loan, or opens bank accounts, in which case Sera Global may need to disclose Your Personal Data to the prospective buyer, lender or bank as part of certain due diligence processes); or
- VII. if Sera Global or any of its affiliates, divisions or business units is acquired by a third party, including in the unlikely event of a bankruptcy, in which case the Personal Data held by Sera Global about You will be accessible to, and may be acquired by, the third-party buyer.

Sera Global may share anonymous or aggregated data with third parties such as service providers to facilitate our business operations.

## **7. Transfers of Your Personal Data**

Sera Global operates globally. This means Personal Data may be processed and disclosed as described above, in any country in which we conduct business or have a service provider. Accordingly, when You provide Your Personal Data to Sera Global, You acknowledge and agree that we may disclose Your Personal Data to recipients (including, but not limited to service providers, Sera Global affiliates or agents, and Sera Global IT servers) located in jurisdictions other than Your own, including but not limited to the following countries: Canada, South Korea, UK, USA and Germany.

To the extent that applicable data protection and privacy laws do not allow or permit us to obtain Your valid consent by virtue of providing this Policy to You, or otherwise rely on the other grounds set out in this Policy for disclosing Your Personal Data outside of Your jurisdiction under the data protection and privacy law of Your jurisdiction, we will obtain Your explicit consent through other means (if applicable) or, where relevant, ensure that the recipient is bound by data protection and privacy laws of its jurisdiction to provide a standard of protection to Your Personal Data that is equivalent to that under the data protection and privacy laws of Your jurisdiction.

In other circumstances, data protection and privacy laws may permit Sera Global to otherwise transfer Your Personal Data outside Your jurisdiction provided it is compliant with such data protection and privacy laws.

## **8. How Sera Global safeguards Your Personal Data**

Sera Global has implemented commercially reasonable controls and appropriate technical and organizational measures to protect Personal Data, as well as to maintain the security of our information and information systems in respect of Personal Data. Client files are protected with safeguards according to the sensitivity of the information contained therein. Appropriate controls (such as restricted access) are placed on our computer systems and used where appropriate. Reasonable measures are taken to ensure physical access to Personal Data is limited to authorized employees.

As a condition of employment, Sera Global employees are required to follow applicable laws and regulations, including in relation to data protection and privacy laws. Unauthorized use or disclosure of confidential information by a Sera Global employee is prohibited and may result in disciplinary measures.

When You contact a Sera Global employee about Your file, You may be asked to confirm some details relating to the Personal Data Sera Global holds about You. This type of safeguard is designed to ensure that only You, or someone authorized by You, has access to Your file.

Other procedures, which Sera Global has in place to ensure Your Personal Data is kept safe and secure include:

- I. Firewalls;
- II. intrusion detection;
- III. 24/7 physical protection of the facilities where Your Personal Data is stored;
- IV. background checks for personnel that access physical facilities; and
- V. security procedures across all service operations.

## **9. Retention & Destruction of Your Personal Data**

The period for which Sera Global will hold Your Personal Data will vary and will be determined by the following criteria:

- I. the purpose for which Sera Global is using it. Sera Global is required to retain the Personal Data for as long as is necessary to satisfy or meet the purposes for which it was obtained including applicable legal or regulatory requirements; and
- II. legal Obligations. Laws or regulations may set a minimum period for which Sera Global must retain Your Personal Data.

Depending on the requirements of the data protection law of Your jurisdiction, Sera Global will take reasonable steps in the circumstances to destroy Your Personal Data when we no longer have a legal basis to retain it or to ensure that the Personal Data is anonymized.

Where Personal Data is retained by Sera Global, it will usually (but not always) held in the following formats:

- a) call recordings, electronic communications and minutes of face-to-face meetings;
- b) suitability and appropriateness assessments;
- c) periodic statements (for example, valuations); and
- d) all orders and transactions in financial instruments on Your behalf.

## **10. Your Rights**

To the extent provided by the law of Your jurisdiction, You may have legal rights in relation to the Personal Data about You that Sera Global holds. These rights may include:

- I. the right to refuse to provide any Personal Data and the right to object at any time to the processing of Your Personal Data. Please note that such refusal or objection may prevent us from providing services to You;
- II. the right to obtain information regarding the processing of Your Personal Data and access to the Personal Data about You that Sera Global holds (including any available information as to the source of the Personal Data);
- III. where consent was provided for certain processing activities, the right to withdraw Your consent to the collection, processing, use and disclosure of Your Personal Data at any time. Please note, however, that this will not affect the lawfulness of any collection, processing, use or disclosure undertaken before Your withdrawal and that Sera Global may still be entitled to process Your Personal Data if it has another legitimate reason (other than consent) or a consent exception for doing so. In some cases, withdrawing Your consent to the collection, use process or disclosure of some or all Your Personal Data may prevent us from providing services to You;
- IV. in some circumstances, the right to receive some Personal Data in a structured, commonly used, and machine-readable format and/or request that Sera Global transmit that data to a third party where this is technically feasible. Please note that this right may, depending on the jurisdiction, only apply to Personal Data that You have provided to Sera Global;
- V. the right to request that Sera Global rectify Your Personal Data if it is inaccurate or incomplete;
- VI. in some circumstances, the right to request that Sera Global erase Your Personal Data. Please note that there may be circumstances where Sera Global is legally entitled to retain Personal Data regardless of any such request;

- VII. in some circumstances, the right to request that Sera Global restrict, anonymize, or block its processing of Your Personal Data. Please note that such a request may prevent us from providing services to You and that there may be circumstances where Sera Global is legally entitled to retain Personal Data regardless of any such request;
- VIII. in some circumstances, the right to obtain information about the public and private entities with which Sera Global made shared use of Your Personal Data as a joint controller;
- IX. in some circumstances, the right to receive information on the possibility of Your not providing consent and on the consequences of the refusal;
- X. in some circumstances, the right to non-discrimination against You for exercising Your legal rights in relation to Your Personal Data; and
- XI. where applicable, the right to lodge a complaint with the data protection regulator in Your jurisdiction if You think that any of Your rights have been infringed by Sera Global.

You can enquire about Your rights, which are applicable to You, by contacting Sera Global's Privacy Office using the details listed below in Section 14. Sera Global will respond to your requests within the time frames set out in applicable data protection laws.

#### **11. Processing of Your Personal Data for Marketing Purposes**

To the extent permitted by applicable law, we may contact You by mail, e-mail, SMS/text, telephone and other electronic means to provide information on products and services that we believe will be of interest, unless You object to receiving such information. If You do not want to receive such communications from us, please contact Sera Global's Privacy Office on the details set out below in Section 14 or by using the opt-out facilities provided within the relevant marketing material.

Your option not to receive promotional and marketing material:

- a. shall not preclude us from corresponding with You, by email or otherwise, regarding Your relationship with us (e.g., Your account status and activity or our responses to questions or inquiries You pose to us);
- b. shall not preclude us, including our employees, contractors, agents and other representatives, from accessing and viewing Your Personal Data for our internal business purposes; and
- c. shall not preclude us from disclosing Your Personal Data as described in this Policy for purposes other than sending You promotional and marketing materials.

#### **12. Use of Personal Data in relation to data subjects in Canada and Australia**

Canadian Anti-Spam Legislation requires that commercial electronic messages ("CEMs") sent within Canada or into Canada from another jurisdiction may only be sent to individuals who opt into receiving them, subject to certain exceptions. Similar legislation applies in Australia (Spam Act 2003 (Cth)). Such consent may be implicit, such as by engaging in a prior business relationship, or by virtue of having one's email address listed in a public directory. These anti-spam laws also require senders to include an opt-out function such as an "unsubscribe" mechanism within a CEM. You may opt-out of the collection or use of Your information by Sera Global. In some cases, withdrawing Your consent to the collection, use or disclosure of some or all of Your personal information will prevent us from providing services to You.

To opt-out, please contact Sera Global's Privacy Office using the details set out below in Section 14. Please note that in some cases Sera Global is permitted to send You certain material after You opt out, such as where required to enforce legal rights.

### **13. California Privacy Rights**

If You are a California resident, You have the right to request certain information from us regarding the manner in which we share with third-parties certain categories of information that identifies You for the third-parties' direct marketing purposes. Sera Global does not share Personal Data with third parties for those third parties' own direct marketing purposes.

Effective 1 January 2020, the California Consumer Privacy Act ("CCPA") provides You with certain rights that are in addition to the rights set out in Section 10 above:

- I. the right to request, up to twice in a twelve-month period, Your Personal Data in a format that is portable and, to the extent technically feasible, in a readily useable format that will allow You to transmit it to another entity;
- II. the right to request that Sera Global delete Your Personal Data, except in circumstances where Sera Global is legally entitled to retain Personal Data regardless of any such request; and
- III. the right to opt out of any sale of Your Personal Data to any third parties, without experiencing any discrimination, as defined under applicable law, as a result of Your exercise of this right. Please note that Sera Global does not sell Personal Data to third parties.

If You are a California resident, Personal Data will include the full definition of "Personal Information" under the CCPA.

If You wish to exercise any of the rights enumerated in this Section 13, please contact Sera Global's Privacy Office using the details set out below in Section 14.

#### **14. Questions & Concerns**

If You have any questions or concerns about Sera Global's handling of Your Personal Data, or about this Policy, please contact our Privacy Office using the contact information set out below:

Email: [privacyoffice@seraadvisory.com](mailto:privacyoffice@seraadvisory.com)

We are typically able to resolve privacy questions or concerns promptly and effectively. If You are not satisfied with the response You receive from our Privacy Office, You may escalate concerns to the applicable privacy regulator in Your jurisdiction, the details of which can be obtained from the Privacy Office.

## **Appendix A**

### ***Canada***

- Sera Global GP Inc.
- Sera Global Securities Canada LP
- Sera Global International Holdings Inc.
- Sera Global Holding LP
- Sera Global Securities Canada (GP) Limited
- Sera Global Administration Canada LP
- Sera Global Administration Canada (GP) Limited
- BFIN Real Estate Group LP / Société en commandite Groupe immobilier BFIN
- BFIN Real Estate Group (GP) Limited

### ***USA***

- Sera Global Real Estate Group US LLC
- Sera Global Securities US LLC
- Sera Global Real Estate California Corporation Inc.
- Sera Global US Holdings LLC

### ***United Kingdom***

- Sera Global Securities UK LP
- Sera Global Real Estate Group UK Limited
- Sera Global Securities UK (GP) Limited
- Sera Global Europe Holdings Limited

### ***Germany***

- Sera Global Real Estate Group (Germany) GmbH

### ***Korea***

- Sera Global Korea Limited