

PRIVACY NOTICE

1. INTRODUCTION

This Privacy Notice sets out how personal data is collected, processed and disclosed in connection with Round Hill Music Royalty Fund Limited (the "**Fund**").

We take privacy and security of your information seriously and will only use such personal information as set out in this Privacy Notice and in ways which are reasonably ancillary to what is set out below.

The Fund is a data controller for the purposes of the Data Protection (Bailiwick of Guernsey) Law, 2017 (as amended) (the "**Guernsey DP Law**"). This means that it determines how and why your personal data is processed.

This Privacy Notice is issued by the Fund and references to the "Fund", "we", "us" or "our" in this Privacy Notice refers solely to the Fund as controller. References to "**you**" include all individuals whose personal data we collect, hold and process in the course of operating the business of the Fund.

This Privacy Notice should be read in conjunction with any terms and conditions, policies or other relevant legal notices including the privacy notices of selected data processors which are available on their respective websites as applicable.

2. CONTACT DETAILS

You can contact our data protection adviser in relation to data protection and your rights by emailing GDPR@jtcgroup.com

3. THE PERSONAL INFORMATION WE PROCESS

3.1 We may collect various types of personal data about you, including:

3.1.1 **Your identification information** (which may include your name, ID card and passport numbers, nationality, place and date of birth, gender, photograph and/or IP address and personal data relating to claims, court cases and convictions, politically exposed person ("**PEP**") status, personal data available in the public domain and such other information as may be necessary for us to provide our services to you and to complete our customer due diligence ("**CDD**") process and discharge our obligations relating to anti-money laundering ("**AML**") and combatting the financing of terrorism ("**CFT**"));

3.1.2 **Your tax status information** (which may include your tax residency, tax identification numbers and/or tax status);

3.1.3 **Your contact information** (which may include postal address and e-mail address and your home and mobile telephone numbers);

3.1.4 **Your family relationships** (which may include your marital status, the identity of your spouse and the number of children that you have);

- 3.1.5 **Your professional and employment information** (which may include your level of education and professional qualifications, your employment, employer's name and details of directorships and other offices which you may hold);
- 3.1.6 **Financial information, sources of wealth and your assets** (which may include details of your assets, sources of wealth, shareholdings and your beneficial interest in assets, your bank details and your credit history).
- 3.2 We may also collect and process personal data regarding people connected to you, either by way of professional (or other) association or by way of family relationship.
- 3.3 To the extent that such personal data contains "special category data", for example: data relating to racial or ethnic origin, political opinion, religious or philosophical belief, trade union membership or criminal data, then the processing of such data shall solely be for the purpose of complying with any duty imposed on us by an enactment or where it is necessary to prevent, detect or investigate any unlawful act or omission.
4. **WHERE WE OBTAIN YOUR PERSONAL INFORMATION:**
- 4.1 We collect your personal information from the following sources:
- 4.1.1 personal information which you give to us, including but not limited to:
- (a) information set out in any subscription agreement with the Fund;
 - (b) such other forms and documents as we may request that are completed in relation to the administration/management of any of our services;
 - (c) information gathered through client due diligence carried out as part of our compliance with regulatory requirements; or
 - (d) any personal information provided by way of correspondence with us by phone, e-mail or otherwise;
- 4.1.2 personal information we receive from third party sources, such as:
- (a) entities in which you or someone connected to you has an interest;
 - (b) your legal and/or financial advisors;
 - (c) other financial institutions who hold and process your personal information; and
 - (d) credit reference agencies and financial crime databases for the purposes of complying with our regulatory requirements.
- 4.2 We may also collect and process personal information received in the course of dealing with advisors, regulators, official authorities and service providers by whom you are employed or engaged or for whom you act.

5. **WHY WE COLLECT YOUR PERSONAL INFORMATION:**

Lawful grounds for processing:

- 5.1 We may hold and process your personal information on the following lawful grounds:
- 5.1.1 the processing is necessary for our legitimate interests, provided your interests and fundamental rights do not override those interests;
 - 5.1.2 the processing is necessary to comply with our contractual duties;
 - 5.1.3 the processing is necessary to comply with our legal and regulatory obligations;
 - 5.1.4 where we have obtained your consent to processing your personal information for a specific purpose; and
 - 5.1.5 on rare occasions, where it is needed in the public interest.

Purposes of processing

- 5.2 Pursuant to paragraph 5.1 above, your personal information may be processed for the purposes set out below ("**Purposes**"). The Purposes based on our legitimate interests are set out in paragraphs 5.2.1 to 5.2.4 inclusive):
- 5.2.1 facilitating the administration of our business and/or that of our service providers;
 - 5.2.2 communicating with you as necessary in connection with your affairs and generally in connection with your investment in the Fund;
 - 5.2.3 monitoring and recording telephone and electronic communications and transactions:
 - (a) for quality, business analysis, training and related purposes in order to improve service delivery; and
 - (b) for investigation and fraud prevention purposes, for crime detection, prevention, investigation and prosecution of any unlawful act (or omission to act);
 - 5.2.4 disclosing your personal information to any bank or financial institution or other third party lender providing any form of facility, loan, finance or other form of credit or guarantee to the Fund;
 - 5.2.5 to enforce or defend our legal and contractual rights or those of third party service providers;
 - 5.2.6 to comply with legal or regulatory obligations imposed on us (including but not limited to AML/CDD obligations);

- 5.2.7 detecting and preventing crime such as fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanction on an ongoing basis ("**Regulatory Assessments**");
 - 5.2.8 facilitating our internal administration and retaining your personal data as part of our Regulatory Assessments or future services entered into by you; and
 - 5.2.9 liaising with or reporting to any regulatory authority (including tax authorities) with whom we are either required to cooperate or report to, or with whom we decide or deem it is appropriate to cooperate in relation to an investment and which has jurisdiction over the Fund or its investments.
- 5.3 We do not make decisions about you based on automated processing of your personal data.

6. **SHARING PERSONAL INFORMATION**

- 6.1 We may share your personal data with our group companies and third parties (including the administrator, registrar, investment manager, the bookrunner, banks, financial institutions or other third party lenders, IT service providers, auditors and professional advisers) under the terms of any appropriate delegation or contractual arrangement. Those authorised third parties may, in turn, process your personal data abroad and may have to disclose it to foreign authorities to help them in their fight against crime and terrorism.
- 6.2 Data processing (as described above) may be undertaken by any entity in the Bailiwick of Guernsey. However, such data processing may also be undertaken by an entity which is located outside the Bailiwick of Guernsey or the European Economic Area (the "EEA") in a third country without the same or similar data protection laws as the Bailiwick of Guernsey or any EU member state, including, but not limited to, South Africa and the United States.
- 6.3 This means that the countries to which we transfer your data are not deemed to provide an adequate level of protection for your personal information. However, to ensure that your personal data receives an adequate level of protection we have put in place the following appropriate measure(s) to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU laws and the laws of the Bailiwick of Guernsey on data protection:
- 6.3.1 utilisation of standard contractual clauses (also known as EU Model Clauses) for data protection which have been approved and adopted by the European Commission and/or the Office of the Data Protection Authority; and/or
 - 6.3.2 the use of another appropriate safeguard envisaged by Article 46 of the GDPR being implemented.
- 6.4 In limited circumstances, applicable law may permit us to otherwise transfer your personal information outside the EEA.
- 6.5 If you would like further information about the safeguards we have in place to protect your personal information, please contact GDPR@jtcgroup.com.

7. **RETENTION OF PERSONAL INFORMATION**

7.1 Your personal information will be retained for as long as required:

7.1.1 for us to carry out the Purposes;

7.1.2 in order to establish or defend legal rights or obligations or to satisfy any reporting or accounting obligations; and/or

7.1.3 as required by data protection laws and any other applicable laws or regulatory requirements.

8. **ACCESS TO AND CONTROL OF PERSONAL INFORMATION**

8.1 You have the following rights (which may be exercisable depending on the circumstances) in respect of the personal information about you that we process:

8.1.1 the right to access personal information;

8.1.2 the right to rectify personal information;

8.1.3 the right to restrict the use of personal information;

8.1.4 the right to request that personal information is erased; and

8.1.5 the right to object to processing of personal information.

8.2 You also have the right to lodge a complaint about the processing of your personal information either with us, or with:

8.2.1 The Office of the Data Protection Authority in Guernsey (www.odpa.gg);

8.2.2 if you are an EU data subject, the supervisory authority in the EU member state of your residence.

8.3 Where we have relied on consent to process your personal information, you have the right to withdraw consent at any time. You also have the right to object to processing on the basis of legitimate interests (although this right is subject to certain exceptions).

8.4 If you wish to exercise any of the rights set out in this paragraph 8, please contact GDPR@jtcgroup.com.

9. **INACCURATE OR AMENDED INFORMATION**

Please let us know as soon as possible if any of your personal information changes (including your correspondence details) by contacting us at Registrars@jtcgroup.com. Failure to provide accurate information or to update information when it changes may have a detrimental impact upon your investment, including the processing of any subscription instructions.

10. **COMMUNICATIONS AND MEDIA**

People who email us

We use software to encrypt and protect email traffic. If your email service does not support this software, you should be aware that any emails we send or receive may not be protected in transit. Please contact us for further detail should you require it.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

Visitors to our website

We are committed to protecting and respecting your privacy on-line. We are aware of the concern which exists over the use of personal information provided over the internet and therefore, we do not collect personal data through our website.

We do not control and are not responsible for the privacy policy of any website or organisation to which our website provides links. By including references, hyperlinks or other connections to such third party websites, we do not imply any endorsement of them or any association with their owners or operators.

Google Analytics

The Fund's website uses Google Analytics to help analyse how users use the site. The tool uses "cookies", which are text files placed on your computer, to collect standard Internet log information and visitor behaviour information in an anonymous form. The information generated by the cookie about your use of the website (including IP address) is transmitted to Google. This information is then used to evaluate visitors' use of the website and to compile statistical reports on website activity for the Fund.

We will never (and will not allow any third party to) use the statistical analytics tool to track or to collect any Personally Identifiable Information ("PII") of visitors to our site. Google will not associate your IP address with any other data held by Google. Neither we nor Google will link, or seek to link, an IP address with the identity of a computer user. We will not associate any data gathered from this site with any PII from any source, unless you explicitly submit that information via a fill-in form on our website.

QUESTIONS

If you have any questions about this Privacy Notice or how we handle your personal information (e.g. our retention procedures or the security measures we have in place), or if you would like to make a complaint, please contact GDPR@jtcgroup.com.

This Privacy Notice was issued on 2nd October 2020. We may update this Privacy Notice from time to time in order to reflect any changes to the way in which we process your personal data or changing legal requirements. We will endeavour to notify you of any substantive changes to our Privacy Notice, however, please review this web page frequently to see any updates or changes.