

Data Privacy Notice

VANGUARD RISK SOLUTIONS DISCLOSURE NOTICE REGARDING COMPLIANCE WITH DATA PROTECTION LAWS. (THE "NOTICE")

Introduction and Definitions

This privacy notice is relevant to all clients of Vanguard Risk Solutions ("Client Relationship").

In this Notice certain other defined terms appear, whose meaning is as follows:

- A Client Relationship or a Vendor Relationship shall be a "Business Relationship";
- "Business Relationship Contract" shall mean a fee agreement (between Vanguard Risk Solutions and its client) or a vendor agreement (between Vanguard Risk Solutions and its vendor); and
- "Data Subject" refers to the natural person to whom the Personal Data relates.

Cayman Islands Data Protection Law.

Cayman's Data Protection Law ("CIDPL") was passed in March 2017 and came into full force on 30 September 2019. Under this law, Vanguard Risk Solutions is considered to be a Data Controller during the course of its business.

This Notice outlines Vanguard Risk Solutions' data protection obligations, and your data protection rights as they relate to your Business Relationship with Vanguard Risk Solutions.

Below is Vanguard Risk Solutions policy statement of how it complies with the CIDPL in relation to such Personal Data.

Collection and Use of Personal Data

In the usual course of Vanguard Risk Solutions' business, it collects and uses certain personal information which constitutes Personal Data. This includes, but is not restricted to, data such as name, residential address, email address, telephone number, insurance policy details, and payment information. Email correspondence may also be maintained to support the ongoing delivery of services.

Vanguard Risk Solutions will only collect, store, and use this Personal Data for lawful purposes including, in particular:

- a) Where this is necessary for the performance of the Business Relationship Contract;
- b) Where this is necessary for compliance with any legal obligation to which Vanguard Risk Solutions is subject; or
- c) Where this is necessary for the purposes of the legitimate interests of Vanguard Risk Solutions and such legitimate interests are not overridden by your interests, fundamental rights, or freedoms.

Analysing Personal Data for quality control, business, and statistical analysis, tracking fees and costs, training and related purposes are considered legitimate interests for using your Personal Data. Any such use of your Personal Data in this way is subject to any relevant overriding prohibitions or restrictions in such use by Vanguard Risk Solutions in the Business Relationship Contract.



Vanguard Risk Solutions may use your Personal Data for such purposes as described above, if it is acting in a fair, transparent, and accountable manner and has taken appropriate steps to prevent such activity having any unwarranted impact on you and noting your right to object to such use, as discussed below.

Vanguard Risk Solutions is required to use your personal data to fulfill its obligations defined in the Business Relationship Contract, and under the provisions of the CIDPL, Vanguard Risk Solutions is not required to obtain your explicit consent to do so. Should Vanguard Risk Solutions wish to use your Personal Data for other specific purposes that require your consent, then Vanguard Risk Solutions will contact you to request this.

Vanguard Risk Solutions do not sell or distribute any personal information to third parties for the purposes of direct marketing.

Processing, Transmission and Storage of Personal Data

It may be necessary for Vanguard Risk Solutions to transfer Personal Data for processing to agents, delegates, subcontractors, or other representatives of Vanguard Risk Solutions to carry out sub-processing activities on behalf of Vanguard Risk Solutions (each a "Permitted Processor") under an appropriate agreement between the Permitted Processor and Vanguard Risk Solutions. A list of the Vanguard Risk Solutions Permitted Processors is available on request.

Vanguard Risk Solutions may only transmit Personal Data:

- To Permitted Processors with the prior consent of the counterparty to the Business Relationship Contract ("Counterparty"); or
- Where required to do so under applicable law.

In addition, it may be necessary for Vanguard Risk Solutions to transfer Personal Data to certain third parties, upon the instruction of the Counterparty, whose involvement is necessary to carry out all or part of Vanguard Risk Solutions' duties and obligations defined in the Business Relationship Contract. In these cases, the third party will not be a Permitted Processor of Vanguard Risk Solutions and will instead be engaged directly by the Counterparty as a processor.

Where Vanguard Risk Solutions is required to transfer Personal Data to a legal, or regulatory authority under applicable law any such transfer shall not constitute the engagement of a Permitted Processor by Vanguard Risk Solutions.

Subject to applicable provisions of the CIDPL, the Personal Data shall not be shared other than has been described here.

The Data Protection Measures Vanguard Risk Solutions Takes

Vanguard Risk Solutions operates an Information Security Policy framework that includes a specific policy on Data Protection. All Vanguard Risk Solutions employees attend annual training to ensure compliance with these policies.

Vanguard Risk Solutions shall apply and shall contractually obligate Permitted Processors to apply appropriate information security measures to protect Personal Data from unauthorised access by third parties or any form of computer corruption.

Vanguard Risk Solutions shall notify you of any Personal Data breach affecting you that is likely to result in a high risk to your rights and freedoms.

Your Data Protection Rights

You have certain rights regarding Vanguard Risk Solutions' use of your Personal Data such as:

- the right to access your Personal Data (in an easily readable form);
- the right to examine and correct your Personal Data;
- the right to restrict the use of your Personal Data;
- the right to withdraw any consent given to the processing of your Personal Data (where applicable);
- the right to receive information regarding any entities Vanguard Risk Solutions discloses your Personal Data to; and
- the right to lodge a complaint with the Cayman Islands Ombudsman, in accordance with the law.

These rights may be restricted either by local legal obligations or to safeguard the fundamental rights and freedoms in a democratic society.

Retention of Your Personal Data

Vanguard Risk Solutions or Permitted Processors may retain your Personal Data following the conclusion of your Business Relationship with Vanguard Risk Solutions for such minimum period as may be required by applicable laws.

Contact

As Vanguard Risk Solutions does not control or process Personal Data on a large scale, Vanguard Risk Solutions is not required to designate a data protection officer. However, an individual has been designated as a Responsible Person for each of:

- The receipt of any queries relating to data protection or in the event a Data Subject wishes to discuss his/her data protection rights with Vanguard Risk Solutions ("General Queries"); and
- Communicating with the relevant supervisory authorities ("Regulatory Communications").

The Responsible Person for Vanguard Risk Solutions can be contacted at the following email address dataprotection@vrscayman.com.