

## THREE ROCK CAPITAL MANAGEMENT LIMITED – PRIVACY NOTICE

### PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH THE EU GENERAL DATA PROTECTION REGULATION (GDPR)

The following information is intended to provide you with an overview of how data is processed by Three Rock Capital Management Limited (“TRCM”) and outlines personal rights under the data protection legislation. This Notice explains how TRCM will manage the Personal Data of Individuals, as required by the General Data Protection Regulation (2016/679) and equivalent applicable local laws and regulations, each as amended from time to time. In this notice, details are provided on how we collect, use, share, retain and transfer information. Your rights are outlined in this notice. Which specific data is processed and how it is used depends upon your interactions with TRCM. TRCM is a subsidiary of Julius Baer Group Ltd. It operates as a Fund Management Company and is responsible for investment funds domiciled in Ireland and in Luxembourg (the “Funds”). In the provisions of management services to those Funds, TRCM will appoint delegates as necessary for the provision of the service to Fund investors. These delegates may undertake processing of Fund investor data.

#### Contact Details

For all matters related to data protection please contact the person responsible for Data Protection at TRCM as per details below.

Three Rock Capital Management Limited

Head of Compliance

61, Thomas Street

D08 DFR3 Dublin

[info.trcm@threerockcapital.com](mailto:info.trcm@threerockcapital.com)

#### 2 Which Data is used by TRCM?

**Personal Data** is defined as any information relating to an identified or identifiable natural person (‘Data Subject’). This means any information that TRCM has or that is provided to TRCM, or which a person provides to TRCM either directly or to its service providers or delegates. The data may be collected in context of a legal relationship with TRCM ( employee) or in the context of a provision of a service ( Fund investor). In the latter case, this data will be collected in the Fund subscription application process and may be updated as required during the Fund service lifecycle management process. The type of data collected by TRCM may include name, address, email address, date of birth etc, from which that individual can be directly or indirectly identified, and may include information such as identification and account numbers, tax identifiers and residency information, and online identifiers. In some rare circumstances Personal Data may be sensitive Personal Data, such as data revealing political affiliations or criminal convictions which may be required for AML/KYC purposes.

TRCM may receive Personal Data from the following sources

- Fund Investors
- Employees
- Job Candidates
- TRCM Website where users submit personal details
- Third party service providers/delegates

### **Employee Data Processing**

TRCM may process data that it receives from employees and that it generates as part of the relationship with those employees. This includes Personal Data, i.e. data that directly identifies members of the Board or Designated Persons or TRCM employees (e.g. name, address, telephone number, etc.).

Types of Personal Data that may be processed:

- personal details (name, address and other contact data, date and place of birth, as well as nationality),
- identification data (e.g. identification documentation data),
- authentication data (e.g. specimen signature),
- record-keeping data (e.g. minutes of consultation),
- accounting data, details relating to your personal background,
- data regarding related third parties such as relatives, agents and/or representatives,
- communication data,
- data that is transmitted and automatically collected during the use of websites, mobile applications or other electronic services provided by TRCM (electronic services). This data includes date and time of access, name of the file downloaded as well as the amount of data transmitted and the access result, your web browser, the browser language and the requesting domain and IP address. Further information can be found in the privacy policy or the legal provisions of the respective electronic service,
- personal data that may be obtained from third party sources such as specialized information files (debt collection, fraud and money laundering registers), land registers, trade and association registers and public sources available on the media and internet,
- as well as other comparable data in line with the criteria outlined above.

By providing TRCM with data relating to third parties, you confirm to be authorised by such third parties to share this data with TRCM and to permit it to process the data. You undertake to inform such third parties about the content of this Privacy Notice.

### **Investor Data Processing**

TRCM may process data that it receives directly from Fund investors or via appointed delegates and that it generates as part of its ongoing provision of services to those Fund investors. This includes personal data, i.e. data that directly identifies Fund investors or the beneficial owners of Fund investors.

Types of Personal Data that may be processed:

- TRCM may collect and process Personal Data relating to its ongoing relationship with Fund investors, such as via correspondence and calls, and in the administration of the relationship
- As part of the TRCM client onboarding and due diligence process, and in line with legal obligations outlined in this notice, we may process some or all of the following name, signature, postal address, email address, date and place of birth, nationality, professional or employment related information, source of funds details, signatures, other contact details, account numbers and transaction details, your tax or social security ID number or equivalent, utility bills for the purposes of address verification, photographic identification and verification such as copies of your passport, passport number and driver's license, information relating to ultimate beneficial owner status of an entity, politically exposed person (PEP) screening or sanctions screening. Such information may also relate to your beneficial owners.
- We process your Personal Data for the purpose of delivering a service to you, for the purpose of maintaining appropriate business records, including maintaining appropriate registers required under applicable law and regulation, for the purpose of quality control, business and statistical analysis, market research, for the purpose of tracking fees and costs and for the purpose of customer service, training and related purposes.

By providing TRCM or its delegated third party service providers with Personal Data, investors are deemed to have confirmed consent for TRCM to process the Personal Data.

### **3 Legal Basis for Data Processing?**

#### **a) For precontractual management**

Management of the contract application, for which purpose TRCM will process the personal information that is necessary to establish a business relationship, in application of the corresponding pre-contractual measures and regulatory obligations.

#### **b) To fulfil contractual obligations and take steps prior to entering into a contract**

The processing of your Personal Data allows TRCM to perform the contractual obligations as agreed with you and to take steps prior to entering into a contract with you. It also is necessary for TRCM to communicate with you. TRCM uses your data, among other purposes, to identify you, verify documents, analyse needs etc. Further details can be found in your contract documents.

#### **c) To safeguard legitimate interests**

Where necessary to safeguard TRCM's, Julius Baer Group companies' and/or other third parties' legitimate interests, to comply with legal and regulatory obligations or to satisfy the requirements from regulators and other governmental authorities, TRCM may disclose Personal Data as follows:

- Prevention and/or investigation of criminal acts.

- Risk management within TRCM and the Julius Baer Group.
- Assertion of legal actions, criminal claims and defence in legal disputes initiated (or threatened to be initiated) by you (or other persons) or by governmental authorities against TRCM, the Julius Baer Group companies and/or any of their directors, officers or employees.
- Consultation and exchange of data with authorised agents (e.g. debt collection registers) for the performance of background checks.
- Safeguarding TRCM's IT security and IT operations.
- Measures to ensure the security of buildings and systems (e.g. entry controls).
- Measures to safeguard and enforce TRCM's and/or Julius Baer Group companies' rights against clients or other stakeholders and protect TRCM's and/or Julius Baer Group companies' interests and claims.
- Measures to defend against allegations made against TRCM and/or Julius Baer Group companies in public, to the media or to local or foreign authorities or self-regulatory bodies.
- In other cases of legal threats or actions involving TRCM or other Julius Baer Group companies.

For all the activities detailed above, the TRCM and/or the relevant Julius Baer Group company have carried out a specific legitimate interest analysis of these processing operations and have concluded that TRCM has sufficient legitimacy to carry them out as they do not prejudice the rights and freedoms of data subjects.

**d) On the basis of your consent**

Provided your consent has been given, TRCM is legally permitted to process Personal Data for specific purposes (e.g. regulatory reasons). You are able to withdraw your consent at any time. Please note that the withdrawal of consent has no retroactive effect on the use of your data.

**e) On the basis of statutory requirements or in the public interest**

TRCM activities are subject to various regulations (e.g. banking laws, Anti-Money Laundering Acts, regulations of the markets and financial sector and tax laws) and TRCM has to fulfil requirements outlined by financial market regulations. The processing of data is used, among others, for the verification of the requirements under the fitness and probity regime, as well as of the identity and age, the prevention of fraud and money laundering, the fulfilment of tax related monitoring and reporting obligations, and the assessment and management of risks of TRCM and within the Julius Baer Group. For these purposes, Julius Baer Group companies and third party companies will share information between them.

**3B – Personal Data Use**

The following provides examples of the types of circumstances where Personal Data may be processed

- Investor Fund subscription or redemption applications
- Administration of existing Fund investor accounts

- In connection with legally required anti money laundering checks and collection of data
- Fund Investor complaints
- Required reporting to regulatory or legal authorities
- Compliance with Beneficial Ownership reporting requirements
- If required by law or in the course of legal proceedings
- Required processing of employee data
- Job applications

#### **4 Access to Personal Data?**

TRCM may disclose and transfer Personal Data to Julius Baer Group companies or appointed delegates which may process such data in particular for the purpose of performing contractual obligations, Fund investor onboarding, purpose of international supervision and oversight, investigations, risk management and compliance, for group-internal outsourcing, provision of Fund services as well as for operational purposes. This includes:

- Compliance with TRCM's and Julius Baer Group companies' legal and regulatory obligations and satisfaction of requirements from regulators and other governmental authorities (such as "know-your-client", verification of creditworthiness, identity and age, prevention of fraud and money laundering, the fulfilment of monitoring and reporting obligations, assessments, investigations, analysis and management of risks);
- Prevention and/or investigations (including e-discovery) of misconduct;
- Managerial oversight, consolidation and maintenance of client data processed by TRCM and Julius Baer Group companies (single-client view);
- Performance of banking related services and activities (such as the provision of advice, wealth management, wealth planning, financing and credit services, trading and execution of transactions) and the analysis of potential needs of clients;
- Providing a comprehensive and tailored offering of services, identifying preferences and needs of account holders, communication with account holders, business development, advertising, market research or surveys;
- Group-internal outsourcing of functions from TRCM to Julius Baer Group companies.

Within TRCM and other Julius Baer Group companies, access is granted only to personnel requiring your data in accordance with the above-mentioned purposes (need to know principle). Internal and external service providers and other agents appointed by TRCM process your data for the same purpose. These can be assigned to the following categories, among others:

- IT (e.g. data hosting and processing, IT development, support and operation),
- administration of financial instruments and other financial assets (e.g. payments, processing of transactions and services, reporting and output services),
- wealth management services and ancillary activities,
- services related to trading, execution and processing of financial instruments and other financial assets,
- compliance and risk management functions,
- accounting (financial accounting and controlling),

- financing and credit services as well as other back- and middle-office activities.

TRCM functions and services may be outsourced to Julius Baer Group companies or to service providers and other agents appointed by TRCM and/or Julius Baer Group companies. If the service providers concerned need to process your data on behalf of TRCM, they are contractually required to comply with the applicable non-disclosure obligations and data protection requirements.

TRCM and/or the relevant Julius Baer Group companies have review processes in place for these service providers to ensure that these companies comply with data protection and information security standards. If TRCM transfers data to external recipients, it has an obligation to ensure the confidentiality of the information is preserved.

Subject to these conditions, recipients of Personal Data can include, among others

- public bodies and institutions (e.g. Central Bank of Ireland, Commission de Surveillance du Secteur Financier (CSSF), Register of Beneficial Owners in Ireland and Luxembourg and other financial authorities, law enforcement authorities) in the event of a statutory or official obligation,
- other credit and financial services institutions or similar institutions to which TRCM transfers Personal Data within the context of its business relationship with you (e.g. correspondent banks, custodian banks, brokers, stock exchanges, information agencies),
- other companies within the Julius Baer Group for risk management, fraud and anti-money laundering purposes as a result of legal or regulatory obligations, as well as service providers and other agents appointed by TRCM.
- any third party services provider as used by TRCM or the Julius Baer Group, whether located in Ireland or abroad.

Circumstances in which TRCM may share Fund Investor's Personal Data

- where necessary for the provision of services for which Fund Investors have contracted
- where necessary to process a Fund investor application for a service
- to provide service providers with Personal Data to allow them to undertake their regulatory and legal responsibilities
- to discharge AML/KYC client onboarding, investigations or regulatory reporting
- where required in the context of auditor and/or legal queries or processes
- if necessary, in the context of transfer or appointment of service providers
- if required to other entities in the Julius Baer Group

Data Sharing – To whom may TRCM share Personal Data?

In connection with the provision of Fund services to investors and arising legal and regulatory obligations, TRCM may share Personal Data with the following entities.

- Fund's administrators / transfer agents
- Fund's compliance officers
- Fund depositaries
- Fund distributors
- tax authorities as required by law

- Fund auditors
- Group companies
- Fund legal counsel
- Parties conducting investor onboarding KYC checks
- Regulatory and Legal bodies as required by law

## 5 **International Data Transfers - Does TRCM Transfer Data across Borders?**

TRCM may disclose Personal Data to jurisdictions where its appointed Delegates or Julius Baer Group companies are established or located or to other jurisdictions, including Switzerland, EU/EEA member states, UK, or to any other jurisdiction around the world where any service provider is located or where TRCM executes transactions or provides services. If Personal Data is disclosed or made accessible to recipients in any such jurisdiction, it will be governed by the local laws and regulations applicable in the jurisdiction where it is disclosed to or made accessible. These laws and regulations may offer a lower level of data protection and client secrecy protection than the laws and regulations applicable in Ireland. In these cases, TRCM and/or Julius Baer Group will generally ensure an adequate level of data protection by concluding data transfer agreements with the recipients of your Personal Data in third countries. These include agreements that have been approved by the European Commission, known as standard contractual clauses (available [here](#)). Please contact the Head of Compliance if you would like more information on this topic. By way of an exception, your Personal Data may also be transferred to countries without an adequate level of protection in other cases, e.g. based on your consent, in connection with legal proceedings abroad or if the transfer is required in order to execute a contract.

Further, recipients of Personal Data, may potentially forward the information to their branches or group entities, service providers or to other market participants or authorities within and/or outside of its jurisdiction.

TRCM especially but not exclusively transfers your data to countries outside the European Economic Area if:

- the data is transferred to other Julius Baer Group companies,
- a service provider is domiciled or located in or operating from such country,
- it is a statutory requirement (e.g. disclosure obligations under tax law), or
- it is provided for in your agreements with TRCM or you have given your consent.

In most cases, your Personal Data will be transferred to countries in which the Julius Baer Group is represented. You can find a corresponding overview at <https://www.juliusbaer.com/en/about-us/our-locations/>.

It should be noted that at the time of this disclosure TRCM does not directly process or transfer any data from Investors in its Funds.

## 6 **Data Retention & Security?**

TRCM processes and retains your data only for as long as is required to fulfil its contractual and legal obligations.

If the data is no longer required for the fulfilment of contractual or legal obligations, it will be deleted in regular intervals, unless it is required for further processing. For this reason, TRCM will keep the Personal Data after termination of the contractual relationship, duly blocked, for the period of limitation of any actions that may arise.

Examples of this would be:

- for the fulfilment of archiving obligations under trade and tax laws (e.g. based on the Code of Commerce or the General Tax Code),
- for the fulfilment of specific regulations that require TRCM to keep data, for example in the event of anticipated litigation,
- for the fulfilment of anti-money laundering regulations.

TRCM has implemented appropriate IT and Cyber Security arrangements to protect Personal Data from unauthorised access, use and disclosure.

## **7 What are your Rights under the new Data Protection Law?**

The EU General Data Protection Regulation grants you the following rights:

- Right to Access-requesting information on Personal Data that TRCM holds on record to be shared with you
- Right to Rectification - demanding that the information be rectified should it be incorrect-
- Right to Erasure - asking that your data be deleted if TRCM is not permitted or is not legally obliged to retain the data –,
- Right to Restrict Processing - demanding that the processing of this data be restricted if
  - you have disputed the accuracy of the data stored by TRCM and it has not yet completed its assessment,
  - you object to the deletion although TRCM is obligated to delete the data, or
  - you have objected to the processing, but it has not yet been established whether this outweighs TRCM's reasons for processing your data,
- Right to Object - objecting to the processing by TRCM if
  - TRCM only processes the data on the basis of its legitimate interests; in this case it will cease the processing unless this is outweighed by its own interests or it needs to process the data in order to exercise its rights, or
  - the processing is carried out with a view to direct advertising,
- Right to Data Portability - demanding that your Personal Data which you have provided to TRCM be transferred in a generally useable, machine readable, and standardized format.
- Right to be Informed – you have the right to obtain confirmation from TRCM as to whether or not Personal Data concerning them is being processed and to be furnished with details of the processing.



- Rights related to automated decision-making including profiling – you have the right to not be subject to a decision based solely on automated processing

You can exercise any of these rights by contacting by e-mail: [info.trcm@threerockcapital.com](mailto:info.trcm@threerockcapital.com).

You also have a right to lodge a complaint (as far as this affects you) with the relevant Data Protection Authority ([https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en)).

## 8 What Data are you asked to Supply?

TRCM requires you to provide the data necessary for the acceptance and execution of a business relationship and the fulfilment of the associated contractual and/or legal obligations. Unless it obtains this data from you, TRCM will most likely be unable to enter into a contractual relationship with you.

## 9 DATA PROTECTION RISK ANALYSIS

TRCM and/or Julius Baer Group have carried out data protection risk analyses of all the processing operations identified in this privacy notice. The issues analysed have taken into account aspects relating to: processing of special categories of data; volume of data; participation of third parties in the data flow; assessment of personal aspects of natural persons; categorisation/segmentation; use of external files as a reference; contracting of external suppliers; transfer of data; bases for legitimisation of the processing and the possibility of exercising data protection rights by data subjects, among others.

## 10 Is the Decision-Making Automated?

As a basic principle, TRCM does not use fully automated decision making for commencing and conducting its business relationships. If TRCM does apply this procedure in exceptional cases, it will inform you accordingly if this is a statutory requirement.

## 11 Will your Data be automatically Processed?

In specific areas (e.g. for certain HR analytics use cases), the Bank will process your data on a semi-automated basis, the aim being to evaluate personal criteria (profiling). This does not apply to investor services.

## 12 Will Biometric Data be used?

Biometric data is Personal Data of a particularly sensitive nature. Therefore, where necessary, TRCM will request a separate express consent before using your fingerprint or any other biometric identification feature for accessing certain applications or uses.

## 13 Where can you find the Current Privacy Notice?

This privacy notice can be adapted at any time in accordance with the corresponding regulations. You will find the most recent version of this Privacy Notice for TRCM at [GDPR Privacy Notice - threerockcapital](#). For Julius Baer locations , country specific notices are available at <https://www.juliusbaer.com/en/legal/privacy-notices-for-clients> or may be sent to you upon request.

#### **14 Children and Minors**

Our services are not directed to individuals under the age of sixteen (16), and we do not knowingly collect personal information from minors under the age of 16.

#### **15 How can you Contact TRCM?**

Should you have any questions about the treatment of your data, please contact your relationship manager or the TRCM's Data Protection Officer, who will be happy to assist you.

Dublin, September 2025