

Commitment to Data Protection and Privacy:

We're really serious about doing the right thing. We always aim to act ethically and honestly because we believe that's key to earning trust.

We value your Privacy and your Personal Data and that is why we as a company are committed to safeguard any information that is shared with us and to use such information in a fair and transparent manner complying with Data Protection Legislation.

1. INTRODUCTION

During the course of our activities, Teza Capital Management LLC and its subsidiary and affiliate Companies: Teza GP LLC, Teza Technologies LLC, and TTX Services UK Limited ("**the Company**", "**we**", "**us**", "**our**") will process your Personal Data (which may be held on paper, electronically, or otherwise) and we recognise the need to treat it in an appropriate and lawful manner, in accordance with applicable data protection laws ("**Data Protection Legislation**").

This Notice explains what Personal Data is collected, the Purposes for which it is used, the third parties to whom it may be disclosed and how individuals can exercise their rights in relation to their Personal Data.

This Notice sets out how Teza Processes (which includes collection and disposal) of Personal Data relating to any individual investor and Personal Data relating to individuals associated with institutional investors, such as an institutional investor's directors, shareholders, trustees, beneficial owners, employees, representatives, agents, professional advisers and other personnel.

In addition, the notice sets out how Personal Data is being Processed, in relation to website visitors, when visiting our premises, supplier employees, and other individuals, such as when submitting a CV or a query.

2. DEFINITIONS

2.1 "Personal data" means recorded information we hold about you from which you can be identified. It may include contact details, other personal information, photographs, expressions of opinion about you or indications as to our intentions about you.

2.2 "Processing" means doing anything with the data, such as accessing, disclosing, destroying or using the data in any way.

2.3 "Purpose of Processing" refers to the reason why your Personal Data is being Processed by us.

2.4 "Data Controller" the entity that decides the means and purposes of processing of your Personal Data.

2.5 "Data Processor" organizations to whom we might delegate some aspect of Processing your Personal Data.

2.6 “Data Protection Legislation”: Regulation (EU) 2016/679 (General Data Protection Regulation), UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018(UK) as they might be applicable.

3. PERSONAL DATA WE PROCESS AND ITS LAWFUL BASIS OF PROCESSING

We may collect (and use for the purposes set out in this Privacy Notice) the following categories of Personal Data about you:

Categories of personal data	Details
Identification data	Information about your identity, such as your name, signature, date and place of birth, nationality and PPSN/ NI Number.
Verification data	Photographic identification and verification such as copies of your passport, passport number, driver's license, address verification and utility bills.
Contact data	Contact information such as your postal address, email address, phone number, fax number and other contact details.
Financial data	Financial information about you, including bank account details, source of funds details, source of wealth, tax identification transaction details, investment activity and company ownership as an ultimate beneficial owner of an entity.
Marketing and Communications data	Information about your marketing preferences and communications.
Shareholder data	Your details as a shareholder, such as the shareholder register account numbers (or functional equivalent).
Professional Information data	Information about an individual's professional role and background. Information concerning professional bodies checks such as from FCA or Foreign regulator. Information related to Companies registration Office Searches.

Special Category/ Other Data	Information relating to your status as a politically exposed person; Sanction screening information; Criminal Convictions and offences.
Device & Usage Data	Device Data: Manufacturer and model, operating system, IP address, and unique identifiers of the device, browser used to access the website, rough estimate of your location from your IP address. Usage Information: Information about how you engage with our website such as the types of content that you view or actions you take on our website, and the time, frequency, and duration of your activities.
Video and Photo	CCTV Images, pictures and videos at Company and external events.

3.1 WE COLLECT AND USE THIS DATA FOR THE FOLLOWING PURPOSES:

Please note that where we process your Personal Data on the basis of our or a third-party's legitimate interest we will ensure that this legitimate interest does not outweigh your interests or fundamental rights and freedoms.

Where we process your Personal Data on the basis of consent, you can withdraw it at any time by reaching out to legalnotices@teza.com

3.1.1 General

Processing Purpose	Category of Personal Data	Basis of Processing
Corresponding with you in line with any requests you may have made;	Contact data	Legitimate interest: Allowing us to run our business and effectively correspond with you and allow us to troubleshoot issues.
Internal and external audits and, where necessary, investigations;	Identification data Verification data Contact data Financial data Marketing and Communications data Shareholder data	Legal or regulatory obligation (such as applicable statutory and internal audit requirements). Legitimate Interests: pursuing our corporate and social responsibility objectives; managing and operating the affairs of the business.
Establishing, exercising or defending legal claims;	Identification data Verification data Contact data Financial data Marketing and Communications	Legitimate Interests: making and defending against legal claims.

	data Shareholder data	
Processing any subject rights exercised, including verification, reviewing and actioning a request;	Identification data Contact data Financial data Marketing and Communications data Shareholder data Special Category/ other data	Legal or regulatory obligation (such as applicable Data Protection Law).
Maintaining appropriate business records, including maintaining appropriate registers of shareholders;	Identification data Verification data Contact data Financial data Marketing and Communications data Shareholder data	Legitimate interests: ensuring business records are up to date.
Where required, for global tax reporting purposes, including FATCA or CRS.	Identification data Verification data Contact data Financial data Shareholder data	Legal or regulatory obligation (such as applicable Tax Law).

3.1.2 Processing of Personal Data related to investors or their related parties

Processing Purpose	Category of Personal Data	Basis of Processing
Establishing your identity, and providing, servicing and administering your investment;	Identification data Verification data Contact data Financial data Marketing and Communications data Shareholder data	Performance of our contract with you; or for the purposes of entering into a contract with you. Legitimate interests: to administer the client relationship.
Complying with Anti-Money Laundering & Terrorist Financing laws;	Identification Data Verification Data Financial Data Shareholder Data Special Category/ other data	Legal or regulatory obligation (such as applicable Anti-Money Laundering and Terrorist Financing laws).
To respond to or evaluate any queries or complaints in relation to your investment;	Identification data Verification data Contact data Financial data Marketing and Communications data Shareholder data	Legitimate interests: to manage the investor relationship; identifying ways to improve and expand business.

To communicate with you by way of notice pursuant to applicable legislation or circulating reports relating to the Company;	Identification data Contact data Marketing and Communications data Shareholder data	Legal or regulatory obligation (such as applicable Notification and Disclosure Requirements). Legitimate interests: to ensure the Company is meeting its notice obligations; to manage and operate the affairs of the Company's business.
To collect and/or manage investments including the payment of monies to investors and the receiving of money from investors;	Identification data Contact data Financial data Shareholder data	Legal or regulatory obligation (such as applicable Record Keeping requirements for Investments). Legitimate interests: ensuring the Company can manage subscriptions, fees and charges and to collect and recover money owed.
For direct marketing purposes (that is, providing information on products and services) or for quality control, business and statistical analysis, market research or for tracking fees and costs or for customer service, training and related purposes.	Identification data Contact data Shareholder data Marketing and Communications data	Legitimate interests: identifying ways to improve and expand business; receiving feedback.

3.1.3 Personal Data about individuals who are our suppliers or other business contacts (and individuals who are employed by our suppliers and business contacts)

Processing Purpose	Category of Personal Data	Basis of Processing
Corresponding and managing the supplier engagement, including business improvement and analysis.	Identification Data Contact Data Work Professional Information data	Legitimate Interest (to manage the supplier relationship and contract we have with the supplier).
Complying with Anti-Money Laundering & Terrorist Financing laws if you are a director of a supplier.	Identification Data Verification Data Financial Data Shareholder Data Special Category/ other data	Legal or regulatory obligation and in the substantial public interest (such as applicable Anti-Money Laundering, Terrorist Financing laws and Tax law).

Complying with our legislative and regulatory obligations in connection with our dealings with you and only in so far as required by law.	Identification data Verification data Contact data Financial data Marketing and Communications data Shareholder data Special Category / Other data	Legal or regulatory obligation and in the substantial public interest (such as applicable Fraud and Tax evasion Law, Anti-Money Laundering Laws and Counter Terrorist Finance Law).
If applicable, processing the fact that you are a politically exposed person, or may have criminal convictions or offences	Special Category / Other data	Legal or regulatory obligation and in the substantial public interest (such as applicable Anti-Money Laundering and Terrorist Financing laws).

3.1.4 Website visitor

Processing Purpose	Category of Personal Data	Basis of Processing
We use necessary and essential cookies to ensure our website functions and runs smoothly.	Device information Usage information	Legitimate interest: To allow us to run our website.
We use performance and analytics cookies to comprehend how visitors interact with our website.	Usage Information	Legitimate Interest: To allow us to understand areas of our website that might need improvement.
We use Marketing cookies to ensure that relevant advertisements are shown.	Usage Information	Legitimate Interest: To personalize the experience of visitors on our website.

3.1.5 Visitors to our premises

Processing Purpose	Category of Personal Data	Basis of Processing
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Keeping a record of visitors within our premise by using a logbook.	Identification Data	Legitimate Interest: Ensuring premises security.
Using closed-circuit television (CCTV) to assist in the investigation of security incidents and to promote and protect the health and safety of individuals.	Video and Photo	Legitimate Interest: Ensuring premises security.

3.1.6 Personal Data Submitted to us when you provide your CV or other information to us

Processing Purpose	Category of Personal Data	Basis of Processing
Ascertain if you may be a suitable candidate for any of the open positions we have.	Identification data Contact data Professional Information data Any information you may wish to disclose in your CV	Legitimate interest: Assessing the suitability of CV's submitted to us by you.
Considering and responding to any queries you may submit.	Any information you may provide in your submission	Legitimate interest: Considering and responding to any requests, comments etc. submitted to us by you.

4. WHERE WE OBTAIN YOUR PERSONAL DATA FROM?

Most of the Personal Data we process is provided to us directly from you. In certain cases, such as to conduct background checks, we utilise screening services, which collate publicly available information, in an easily searchable manner.

We receive information about interested Investors through the subscription forms directly from the investor. In rare circumstances we may receive information from intermediaries.

When using our website, we will collect certain information from your device.

5. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We will only keep your Personal Data for as long as we reasonably require taking into account our legal obligations, guidance issued and reasonably assessing necessary storage periods.

This means that data will be destroyed or erased from our systems when it is no longer required.

6. YOUR RIGHTS

You have the following rights, in certain circumstances and subject to applicable exemptions, in relation to your Personal Data, as set out in more detail in Chapter 3 of the GDPR:

- the right to access your Personal Data, together with information about our processing of that Personal Data;
- the right to rectify any inaccuracies in your Personal Data;
- the right to have any incomplete Personal Data completed;
- the right to erase your Personal Data (in certain specific circumstances);
- the right to request that your Personal Data is no longer processed for particular purposes (in certain specific circumstances);
- where the legal basis for processing is consent, the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- the right to object to the use of your Personal Data or the way in which it is processed where the Company has determined it to be necessary for the purposes of its legitimate interests;
- the right to data portability (in certain specific circumstances); and
- the right to object to any decision that significantly affects you being taken solely by a computer or other automated process. Note, that TEZA currently does not engage in any decision making solely by automated means;
- the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of Personal Data relating to you infringes applicable data protection law.

If you have any questions about your data protection rights or if you want to exercise those rights, please contact us at legalnotices@teza.com.

7. DISCLOSURE OF PERSONAL DATA

Personal Data may be shared amongst our affiliates in order to manage our business.

Where, by law or regulatory request, we are obliged to do so, we will disclose your Personal Data to regulators, law enforcement agencies and competent authorities. It may be necessary to disclose your Personal Data if we are under a duty to do so, in order to comply with any legal obligation (such as anti-money laundering obligations), carry out an internal investigation, enforce any agreement we have with you or with a related party, or protect the rights, property or safety of Teza, our clients, directors, employees or other personnel. This includes exchanging information with other companies and organisations for the purposes of fraud protection and prevention.

Teza utilises service providers in order to effectively run its business. This means that Personal Data may be provided to such service providers such as:

- Information Technology and Information Security providers for the provisioning of hardware and software, development, hosting and support.
- Professional Service providers such as auditors, legal advisors, accountants and other specialist services.
- Screening application providers to conduct our due diligence, AML/KYC checks and screen for politically exposed persons and sanctions screening.

If we are involved in a merger, acquisition or asset sale, financing due diligence, reorganisation, bankruptcy, receivership, sale of company assets, or transition of service to another provider, your Personal Data may be transferred, or otherwise shared including as part of any due diligence process.

8. COUNTRIES YOUR DATA MAY BE TRANSFERRED TO

We may process or transfer your Personal Data outside the EEA, for the purposes mentioned within this notice. The countries we may transfer Personal Data to include, but are not limited to the US, UK and Armenia. We do so in compliance with applicable Data Protection Legislation and will ensure an appropriate safeguard is in place, such as:

- An adequacy decision, as approved by the appropriate governing body
- Binding Corporate rules
- Standard Contractual Clauses
- Certification under the EU-US / UK-US/ CH-US Privacy Framework
- In specific circumstances, we may rely on permitted derogations under applicable law

9. CHANGES TO OUR PRIVACY NOTICE

Teza, will from time to time amend this Privacy Notice and will provide the updated version accordingly.

10. CONTACT US AND COMPLAINTS

Should you have any doubts about the content of this Notice, or if you believe there has been an infringement regarding the processing of your Personal Data please contact us at legalnotices@teza.com.

You can also make a complaint to your local supervisory authority, such as the Information Commissioner's Office (ICO), if you are unhappy with how we have used your data.

The ICO's address:

GDPR Privacy Notice August 2025

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>