

Privacy Notice

This Privacy Notice applies to the collection and processing of Personal Data by PVI Services Limited and Parkview International, Inc. regarding the processing of Personal Data collected within the European Economic Area (“EEA”) and only to the extent that the General Data Protection Regulation (the “GDPR”) and other European Union data protection laws apply to the companies.

Parkview International, Inc. (“Parkview”) and PVI Services Limited (“PVI”) and their respective affiliated companies are jointly and severally referred to as “we” and “us”.

Parkview and PVI (the “Companies”) and their respective affiliated companies, each acknowledge that the protection of Personal Data is one of their most significant legal obligations.

This Privacy Notice sets out what Personal Data we collect, how we collect it, how we use it, and your rights in connection with how we process your Personal Data. We are committed to protecting your Personal Data as joint data controllers in accordance with our duties under the GDPR.

1. Collection and use of Personal Data

We collect personal data when you interact with us by post, phone, email or otherwise.

We have set out below, in a table format, a description of the types of Personal Data we collect, how we plan to use your Personal Data, and which are the legal basis we rely on to do so.

You can refer to section 10. **Glossary** for a description of the terms used in the table below.

Use	Categories of Personal Data	Legal Basis
To register you as a new customer and/or as a new co-investor.	Identity Data Contact Data Customer Data	Contract.
To bill for the services provided and to enable us to evaluate potential co-investment business opportunities.	Financial Data Identity Data Contact Data Customer Data	Contract.
To market to prospective customers and prospective co-investors.	Technical Data Usage Data Marketing and Communications Data	It is in our legitimate interest to grow our business, to expand our customers and co-investors and intermediary referrer base (only where consent is not otherwise required by applicable law).

To use data analytics to improve our website, products / services / marketing / customer relationships and experiences.	Technical Data Usage Data	It is in our mutual legitimate interest to improve your experience on our websites
To administer and protect our business and our website including Troubleshooting, and data analysis, testing, system maintenance, support, reporting and hosting of data.	Technical Data Usage Data	It is our mutual legitimate interest to improve your experience on our website.
To prevent fraud and money laundering.	Identity Data Contact Data Financial Data	Legal Obligations.
For financial administration and planning, maintaining records related to business activities, and strategic planning relating to the provision of middle and back-office services related to Parkview International Inc's private wealth management business.	Customer Data Financial Data	It is in our legitimate interest to manage the efficiency of our business
To notify you about changes to our terms and/or privacy notice.	Identity Data Contact Data Technical	Legal Obligations.
To answer your requests relating to your data protection rights	Identity Data Contact Data	Legal Obligations.

We may use your Personal Data for purposes other than the ones listed above. Should this be the case, we will inform you of the purpose in accordance with applicable laws and regulations.

2. Recipients

In order to achieve our purposes set out in the table above, we may share your Personal Data with the following categories of recipients:

- our directors, officers, employees, agents and shareholders;
- our affiliated companies and entities; and
- government agencies and courts to comply with applicable law or enforceable governmental or regulatory requests. .

We require all third parties who process Personal Data on our behalf to respect the security of your Personal Data and to treat it in accordance with their contractual obligations. These

include:

- our bankers and any lenders to us;
- our accountants and auditors;
- our legal and other professional consultants and advisers;
- any credit reference agency; and
- our IT support providers or other service providers that support our business operations.

We may need to share your Personal Data with more recipients than the ones listed above. Should this be the case, we will inform you of the change in accordance with applicable laws and regulations.

3. If you fail to provide Personal Data

Where we need to collect Personal Data by law, or under the terms of a contract we have with you and you fail to provide the data when requested, we may not be able to perform the contract we have or are trying to enter into with you. If that is the case, we may have to cancel or amend a contract or service you have with us.

4. International Transfer of Personal Data

PVI is committed to complying with this Privacy Policy and European data protection laws with regard to information transferred from the EEA. The laws in the United States and other countries outside the EEA may not be as protective as the laws in the EEA. Because of this, PVI has taken steps to protect your privacy and fundamental rights when your Personal Data is transferred to the United States (and to other countries where no adequacy decision of the European Commission exists). For transfers to Parkview in the United States, we make use of the European Commission's Standard Contractual Clauses. For transfers to third parties, we make sure that the either recipient is subject to a jurisdiction for which an adequacy decision of the European Commission (including the EU-U.S. Privacy Shield where the recipient is a participant), or that there are adequate safeguards such as the Standard Contractual Clauses or binding corporate rules in place.

5. Your rights in relation to Personal Data

You have the following rights regarding your Personal Data that we hold:

a) Right of access

You can request details of your Personal Data that we hold. We will confirm whether we are processing your Personal Data and we will disclose supplementary information including the categories of data, the sources from which it originated, the purpose and legal basis for the processing, the expected retention period, and the safeguards regarding data transfers to non-EEA countries, subject to the limitations set out in applicable laws and regulations. We will provide you free of charge with a copy of your Personal Data, but we may charge you a fee to cover our administrative costs if you request further copies of the same information.

b) Right of correction

We will comply with your request to correct incomplete or inaccurate parts of your Personal Data, although we may need to verify the accuracy of the new information you provide us.

c) Right to be forgotten

At your request, we will delete your Personal Data promptly if:

- it is no longer necessary to retain your Personal Data;
- you withdraw the consent which formed the basis of your Personal Data processing;
- you object to the processing of your Personal Data and there are no overriding legitimate grounds for such processing;
- the Personal Data was processed illegally; or
- the Personal Data must be deleted for us to comply with our legal obligations.

We will decline your request for deletion if processing of your Personal Data is necessary:

- to comply with our legal obligations;
- in pursuit of a legal action;
- to detect and monitor fraud; or
- for the performance of a task in the public interest.

d) Right to stop your Personal Data being used for direct marketing purposes.

At your request, we will stop using your Personal Data for the purpose of direct marketing. If you want to stop us from calling, emailing you in connection with marketing communications, please email us at the email address listed in section 11. **Contact Us** of this Privacy Notice.

Please note that even if we stop all marketing communications, you may still receive administrative communications from us.

e) Right to restrict processing of your Personal Data

At your request, we will limit the processing of your Personal Data if:

- you dispute the accuracy of your Personal Data;
- your Personal Data was processed unlawfully and you request a limitation on processing, rather than the deletion of your Personal Data;
- we no longer need to process your Personal Data, but you require your Personal

- Data in connection with a legal claim; or
- you object to the processing pending verification as to whether an overriding legitimate ground for such processing exists.

We may continue to store your Personal Data to the extent required to ensure that your request to limit the processing is respected in the future.

f) Right to data portability

At your request, we will provide you free of charge with your Personal Data in a structured, commonly used and machine readable format, if:

- you provided us with Personal Data;
- the processing of your Personal Data is based on your consent or required for the performance of a contract; or
- the processing is carried out by automated means.

g) Right to object

Where we process your Personal Data based upon our legitimate interest (or that of a third party), you have the right to object to this processing on grounds relating to your particular situation if you feel it impacts on your fundamental rights and freedoms. We will comply with your request unless we have compelling legitimate grounds for the processing which override your rights and freedoms, or where the processing is in connection with the establishment, exercise or defense of legal claims.

h) Right not to be subject to decisions based solely on automated processing

You will not be subject to decisions with a legal or similarly significant effect (including profiling) that are based solely on the automated processing of your Personal Data, unless you have given us your explicit consent or where they are necessary for a contract with us.

i) Right to withdraw consent

You have the right to withdraw any consent you may have previously given us at any time.

j) Right to complain to a supervisory authority

If you are not satisfied with our response, you have the right to complain to or seek advice from a supervisory authority and/or bring a claim against us in any court of competent jurisdiction.

If you wish to contact us in connection with the exercise of your rights listed above, please email us at the email address listed in section 11. **Contact Us** of this notice. We will respond to your written request as soon as possible and no later than 30 days from receiving it.

Unless stated otherwise, we will not charge you any fee in connection with the exercise of your rights. In so far as it is practicable, we will notify the recipients of your Personal Data of any correction, deletion, and/or limitation on processing of your Personal Data.

Please note that if you decide to exercise your rights under sub-sections (3), (4), (5), (7), (8) and (9), depending on our response, you may not be able to take full advantage of all of our benefits and services from that point on.

6. Retention Period

We keep your information as long as it is needed to achieve our purposes listed above, as well as for the amount of time necessary to meet any legal, tax, or reporting requirements.

We do not keep your personal information for longer than necessary and up to 7 years after your last interaction with us. We may keep your data for longer than 7 years if we cannot delete it for legal or technical reasons.

7. Security

We have a management system to correct and prevent unauthorised access, loss, destruction, falsification, and leakage of Personal Data, as well as the appropriate technical and organizational measures to address such risks, as further detailed below. The goal of these measures is to maintain our data protection standards and to ensure we have the necessary safeguards for the processing of Personal Data.

- Personal Data is stored on a secure server.
- Access to Personal Data is restricted to those employees who have a need to know.

8. Accountability

We are responsible for all the safeguards implemented in relation to the processing of Personal Data, and we maintain an electronic record of all processing activities of our Personal Data.

9. Updates

This Privacy Notice may be updated to reflect changes to our Personal Data processing policy. In the event there is material change to this Privacy Notice we will inform you via our website.

10. Glossary

Some of the words in this Privacy Notice have the meanings set out below:

Contact Data means postal address, email address, telephone and/or facsimile numbers.

Customer Data means Bank account details, investment portfolio and history and information contained in correspondence with customers to the extent these relate to a natural person

Contract means the processing is necessary for the performance of a contract we have with you or in order to take steps to enter into a contract with you.

Identity Data means data relating to your identity including your first name, any middle names, maiden name, last name, title, date of birth and gender.

Legal Obligations means the processing is necessary for us to comply with legal obligations we are subject to, including compliance with anti-money laundering laws and regulations.

Marketing and Communications Data includes your preference in receiving marketing from us and our third parties and your communication preferences.

Technical Data means technical data including internet protocol address, login data, browser type and version, time zone setting plug-in types and versions, operating system and other technology on the device you use to access our website.

Usage Data includes information about how you use our website.

Personal Data shall have the meaning as set out in the GDPR.

11. Contact Us

If you have any questions or opinions regarding the application of this Privacy Notice to either Parkview International, Inc. or PVI Services Limited or if you have a request regarding information you provided to either Parkview International, Inc. or PVI Services Limited, you may either email us or send us a letter to the address below:

Parkview International, Inc.
152 West 57th Street, 58th Floor
New York
NY 10019
United States of America

info@pvi-usa.com

If you have any questions or opinions regarding the application of this Privacy Notice to PVI Services Limited, or if you have a request regarding information you provided to PVI Services Limited, you may either email us or send us a letter to the address below:

PVI Services Limited
21 Arlington Street
London
SW1A 1RN
England

london-admin@pvis-uk.com