

## Privacy Notice

This notice (the “**Privacy Notice**”) explains how we use the personal data that the Company collects or which is provided to the Company.

The “**Company**”, “**we**” or “**us**” means Tsaker Chemical Group Limited with its registered office c/o International Corporation Services Limited, PO Box 472, Harbour Place 2nd Floor, 103 South Church Street, Grand Cayman KY1-1106, Cayman Islands and includes all of the Company’s subsidiaries and affiliates.

This Privacy Notice is directed to individuals whose personal data we or our third party processors handle in the course of carrying on our commercial activities, including an investor in the Company, a member, partner, trustee, shareholder, beneficial owner, officer, director, employee or other representative of any client of the Company and any investor in the Company, including any prospective client or investor (“**you**”).

The Company is responsible for ensuring that we use your personal data in compliance with applicable data protection law. This Privacy Notice sets out the basis on which any personal data about you will be processed by us.

### Personal data that we collect and process about you

- Information that you provide to the Company: the nature of our relationship with you will determine the kind of personal data we might ask for, though such information may include (by way of a non-exhaustive list) basic personal data such as name, address, email address, phone number and tax identification number.
- Information that we collect or generate about you: files that we may produce as a record of our relationship with our clients and prospective clients, including contact history, and any personal data that you provide during communications with us.
- Information that we obtain from other sources: this includes information from publicly available sources, information from the transfer agents or administrators of the Company or financial intermediaries, platforms, professional advisers, and information obtained from sanctions checking and background screening.

### Purpose of processing and legal basis for processing

Your personal data may be processed by the Company (or any of its affiliates, agents, delegates or sub-contractors) for the following purposes which are necessary for performance of your contract with us:

- Managing and administering your holdings in the Company, including assessing and processing subscription applications, communicating with you about your holdings and account related activities on an on-going basis;
- To update and maintain records and provide net asset value and other calculations;
- To manage and maintain our relationship with you for ongoing customer service;

- To enforce or defend the Company's rights either directly through the Company or through third parties to whom it delegates such responsibilities;
- To comply with any applicable legal, tax or regulatory obligations of the Company, including those that derive from anti-money laundering and counter-terrorism legislation; and
- To communicate with clients and prospective clients in order to provide information about the Company and other products and services.

Your personal data may be processed by the Company (or any of its affiliates, agents, delegates or sub-contractors) for the following purposes in order to enable the Company to comply with its legal or regulatory obligations:

- in order to carry out anti-money laundering checks and related actions including sharing your personal data with police, law enforcement, tax or regulatory authorities, or other government agencies where we have a legal obligation, including screening transactions, reporting suspicious activity and complying with production and court orders;
- to report tax related information to tax authorities, including the automatic exchange of tax information;
- to investigate and resolve complaints and manage contentious regulatory matters, investigations and litigation; and
- to monitor electronic communications for investigation and fraud prevention purposes, crime detection, prevention and investigation.

Please ensure that you provide a copy of this Privacy Notice to any third parties whose personal data you provide to the Company. This Privacy Notice may be updated at any time and the Company will post changes to this Privacy Notice on our website [www.tsaker.com](http://www.tsaker.com).

### **Recipients of data and international transfer of data**

The Company may disclose your personal data as follows:

- to our business partners who will be subject to appropriate data protection obligations;
- to our affiliates and third party service providers engaged in connection with the oversight, safekeeping, administration, distribution or operation of the Company, in order to process the data for the above mentioned purposes; and
- to competent authorities (including tax authorities), courts and bodies as required by applicable law or requested by such entities or to affiliates for internal investigations and reporting.

The disclosure of personal data to the third parties set out above may involve the transfer of data to jurisdictions outside your country of residence for processing. Where the Company transfers your personal data to another country it is required to do so in a manner consistent with legal requirements. This may be done in any of the following ways:

- the country to which we send your personal data might be approved by the European Commission as offering an adequate level of protection for personal data;
- the recipient may have signed a contract based on “model contractual clauses” approved by the European Commission, obliging it to protect personal data;
- if the recipient is located in the United States, it might be a certified member of the EU-US Privacy Shield scheme; or
- in other circumstances the law may permit us to otherwise transfer your personal data outside the Cayman Islands.

### **Personal data quality**

We rely on the accuracy of the information provided by you and others. We take reasonable efforts to ensure that personal data collected by us or on our behalf is accurate, up to date, and complete, in accordance with applicable law. If any information about you changes or you have any concerns regarding the accuracy of information about you held by us, you should contact us at the address provided in the section headed “How to contact the Company” below.

### **Security of personal data**

The Company has physical, electronic and procedural safeguards in place to protect personal data from loss, misuse, unauthorised access, disclosure, alteration and destruction, however no data security measures can guarantee complete security all of the time.

### **Retention period**

The Company will retain your personal information for as long as is necessary to provide our services to you, to fulfil the purposes described in this Privacy Notice and/or our business purposes, or as required by law, regulation or internal policy. We are obliged to retain certain information to ensure accuracy, to help maintain quality of service, and for legal, regulatory, fraud prevention, and legitimate business purposes. In general, the Company (or our service providers) will hold personal data for a period of seven years from the date on which you redeem all of your interests in the Company or for as long as required for the Company to perform the services or comply with applicable legal/regulatory obligations.

### **Consequences of not providing required data**

Where the Company requires your personal data to comply with anti-money laundering or other legal requirements, failure to provide this information means the Company may not be able to accept you as an investor in the Company and/or may be unable to process, or release, your investment in the Company. This may result in the Company terminating its relationship with you. We will tell you when we ask for your information whether it is a statutory or contractual requirement to give us the information and the consequences of not providing the information.

## **Data Subject Rights**

You have various rights in relation to your personal data held by us, including the right to:

- be informed and to request access to your personal data;
- correct any mistakes on our records, erase or restrict records where they are no longer required;
- object to use of personal data where that processing is based on the Company's legitimate business interests or for direct marketing; and
- request not to be subject to automated decision making if the decision produces legal or other significant effects on you.

Your rights in relation to your personal data outlined above are subject to a number of legal conditions and exemptions. We will respond to your request in writing, or orally if requested, as soon as practicable and in any event not more than within one month after of receipt of your request. In exceptional cases, we may extend this period by two months and we will tell you why. We may request proof of identification to verify your request.

## **Changes to this Privacy Notice**

We will post changes to this Privacy Notice on our website [www.tsaker.com](http://www.tsaker.com) along with the effective date of the updated notice. We recommend that you review this Privacy Notice periodically.

## **How to contact the Company**

If you have any questions about the use of your personal information, please contact Ms. Yang Xue at [yangxue@tsaker.com](mailto:yangxue@tsaker.com).