

GDPR Data Protection Notice

Caxton Associates LLP, Caxton Associates (USA) LLC and their affiliates ("**Caxton**"), as data controllers, have obligations under applicable data protection laws, including the UK General Data Protection Regulation ("**UK GDPR**"), the Data Protection Act 2018 and, where applicable, the European Union General Data Protection Regulation ("**EU GDPR**"), to inform employees, consultants, prospective employees, prospective consultants, former employees and former consultants (together, "**Personnel**") about the personal data held about them and their rights in relation to that data. In the course of Caxton's business activities, personal data relating to Personnel may be collected, used, stored and otherwise processed in accordance with applicable law and regulation. Such personal data may include names, contact information, dates of birth, bank account information and other personal information.

A. WHY PERSONAL DATA IS BEING COLLECTED

All personal data relating to Personnel provided to Caxton will be processed in compliance with applicable data protection laws and regulations. The purposes for this data processing include, but are not limited to:

- The performance of employment and consultancy arrangements and the fulfilment of obligations between Caxton and Personnel;
- General business administration, including communicating with service providers and counterparties, accountancy and audit services, risk monitoring, the administration of IT systems and monitoring and improving products;
- Compliance with legal and regulatory obligations arising under U.S., UK and European laws and regulations, including the Investment Advisers Act of 1940; and
- The provision and administration of benefits for Personnel, including health insurance and pension benefits.

The provision of personal data for these purposes is necessary for the establishment and administration of employment and consultancy relationships with Personnel and for the legitimate business interests of Caxton. Whenever we process your personal data, we will endeavour to take account of your rights and to balance our interests with them. You have the right to object to this processing if you wish but please bear in mind that if you object this will affect our ability to provide these additional services for your benefit.

B. LEGAL BASIS, RETENTION AND INTERNATIONAL TRANSFERS

The legal bases relied upon by Caxton include the performance of employment or consultancy arrangements, compliance with legal and regulatory obligations, the pursuit of legitimate business interests and, where required, on the basis of consent.

Personal data will be retained for as long as necessary to fulfil the purposes described in this Notice and to comply with applicable legal, regulatory and record-keeping obligations.

As a global organisation, Caxton may transfer personal data between its group entities, affiliates and authorised service providers in different jurisdictions. Where personal data is transferred internationally, Caxton will implement appropriate safeguards in accordance with applicable data protection laws.

C. HOW DATA IS PROCESSED

Personal data relating to Personnel is processed both manually and electronically in accordance with the above-mentioned purposes and, in any case, in order to guarantee data security and data confidentiality in compliance with current regulations. It is Caxton's policy that access to personal data will be given only to those who need such access for the purposes listed above or where required by law. These parties include human resources personnel, information technology personnel, relevant business managers, and authorised representatives of internal control functions, such as Compliance. Your data may also be transferred to third parties to meet legal, regulatory, or tax obligations or when required by applicable law.

Personal data may also be transferred to authorised service providers that Caxton contracts with for a number of business purposes, including complying with legal obligations, meeting contractual employer obligations, or providing additional optional benefits. We endeavour to ensure that only the exact data required to fulfil each processing purpose (whether

internal or external) is made available to the necessary individuals or third-party companies. It is Caxton's policy that agreements with service providers include commitments that they agree to limit their use of personal data to our specific instructions and to comply with privacy and security standards.

When Caxton shares your information, either internally or to external third-party companies, we take all reasonable steps to ensure that your information and privacy are protected in line with all applicable legal obligations.

D. RIGHTS OF CAXTON PERSONNEL UNDER APPLICABLE DATA PROTECTION LAWS

Applicable data protection laws grant certain rights to Personnel in relation to the processing of their personal data.

These rights include:

- (a) The right to obtain information regarding the processing of the personal data of Personnel and access to the personal data that Caxton holds about Personnel.
- (b) In some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and the right to request that Caxton transmits that data to a third party where this is technically feasible. Please note that this right only applies to personal data which Personnel has provided to Caxton.
- (c) The right to request that Caxton corrects the personal data of Personnel if it is inaccurate or incomplete.
- (d) The right to request that Caxton erases personal data of Personnel in certain circumstances, provided there may be circumstances where Personnel asks Caxton to erase their personal data, but Caxton is entitled to retain it pursuant to applicable law, rule or regulation.
- (e) The right to object to, and the right to request that Caxton restricts its processing of the personal data of Personnel in certain circumstances. There may be circumstances where Personnel objects to or asks Caxton to restrict processing of the personal data of Personnel, but Caxton is entitled to continue processing such personal data or to refuse that request pursuant to applicable law, rule or regulation.
- (f) The right to lodge a complaint with the data protection regulator (details of which are provided below) if Personnel believes that any of their rights have been infringed by Caxton.

If you consider that the processing of your personal data infringes applicable data protection laws, you have the right, without prejudice to any other administrative or judicial remedy, to lodge a complaint with the relevant supervisory authority, including the UK Information Commissioner's Office (ICO) or, where applicable, the supervisory authority in the Member State of your habitual residence, place of work or place of the alleged infringement.

If you have any questions regarding your rights under applicable data protection laws and how to exercise them, please contact compliance@caxton.com.