

HAWKCLAW REGULATION ON DATA PROTECTION

1. DATA PROTECTION CHARGE

The person in charge of data protection is Francisco António Bessa Falcão Gomes de Castro, and will be the same to decide the information related to customer data that is transmitted to the other Hawkclaw workers / collaborators.

2. TRANSPARENCY

Although existing privacy laws require organizations to inform individuals of the categories of personal data collected and what they are used for, the GDPR emphasizes the need to ensure that notification is explicit and provided in a clear and concise manner to the individual at the time that data is collected.

Hawkclaw has revised and updated its privacy notices, therefore providing more details about the collection of user data, how it is collected (along with the legal collection and processing basis) and what it is used for.

3. FORM OF DATA PROTECTION

3.1 WHAT TYPES OF PERSONAL DATA WE COLLECT?

We collect contact details (name, phone and email numbers or postal addresses) when the customer gets involved with us to ensure that the relationship runs smoothly. When we are required to carry out checks to comply with our legal and regulatory obligations, we will collect additional specific information about relevant individuals (such as directors and beneficiary owners), including, for example, date of birth, payment details, tax residence information, copies photo identification, documents (such as driving license and / or passport / identity card), information about nationality / place of birth, national identification numbers and other identity verification documents. We may also keep information that someone else in the organization has decided to provide us with. The personal data you provide to us may include your name, postal address, e-mail address, telephone number, financial information, bank account / payment details, identification documents and other relevant personal details.

We do not collect or process sensitive personal data (this includes details about race or ethnicity, religious or philosophical beliefs, sexual life, sexual orientation, political opinions, union membership, health status information and genetic and biometric data) or conviction / condemnation data criminal offense, unless necessary to fulfill a legal and / or regulatory obligation.

3.2 HOW DO WE COLLECT PERSONAL DATA?

3.2.1 PERSONAL DATA WE RECEIVE DIRECTLY FROM THE CUSTOMER

We receive personal data directly from the customer in two ways:

- The client contacts us proactively, usually by phone or e-mail or by filling out forms; and / or
- We contact the customer by phone or email.

3.2.2 PERSONAL DATA WE RECEIVE FROM OTHER SOURCES

When appropriate and in accordance with local laws and requirements, we may seek further information about the client or its organization, through “due diligence” or other means including:

- From third-party data providers and analyzing media "online" and "offline";
- From lists of delegates at relevant events; and / or
- From other limited and third party sources (for example, third party brokers and counterparties that can provide us with data in accordance with any requirements).

3.2.3 PERSONAL INFORMATION WE AUTOMATICALLY COLLECT

As the customer accesses our website or reads or clicks on an email from us, when appropriate and in accordance with local laws and requirements, we may also collect data automatically or through the customer.

3.3 HOW DO WE USE PERSONAL DATA AND WHAT IS THE LEGAL BASIS?

Having obtained customer data, we make sure to use it properly.

3.3.1 CUSTOMER DATA

3.3.1.1 Investment Activities

Whether you are a customer or a potential customer, we use the personal data he provides in the following ways:

- store your data (and update it when necessary) in our database so that we can contact you regarding our services, agreements or negotiations in progress with it, including relevant offers;
- fulfill our obligations under our contracts with the customer;
- taking measures against money laundering and knowing your checks in accordance with our legislation and regulatory obligations;

- keep records of conversations and meetings so that we can provide relevant services to the customer and to comply with our legal and regulatory obligations;
- for internal analysis and research, in order to facilitate the provision of relevant services to the client;
- in more unusual circumstances, to help us establish, exercise or defend legal claims; and
- comply with legal and / or regulatory requirements.

3.3.1.2 Relationship Management

- We can use personal data to contact you and offer you additional services, keep you up to date with business development and market insights or to invite you to events that may be of interest (except where the client has asked us not to be invited).
- The customer has the right to opt out of receiving such communications from us through his Hawkclaw contact or by electronically canceling the emails we send. After the customer unsubscribes, we will not send communication emails, but we may continue to contact him as necessary for the purposes of any services we are offering, or necessary for regulatory purposes.

3.3.2 SUPPLIER DATA

We will use customer information:

- To store (and update when necessary) your data in our database, so that we can contact him in relation to our agreements or our negotiations with him;
- Obtain customer support and services;
- Comply with certain legal and regulatory obligations, such as taking actions against money laundering and background checks;
- Facilitate our billing processes;
- In more unusual circumstances, to help us establish, exercise or defend legal proceedings.

3.4 OUR LEGAL BASIS FOR PROCESSING PERSONAL DATA

We have one of the following legal bases:

- Necessary for the performance of the contract or to take preparatory measures for such a contract;
- Legal obligations to comply with legal and regulatory obligations to which we are subject; or
- Legitimate interests pursued by us or by third parties, to the extent that such interests are not overlapping; for their fundamental interests or rights and freedoms.

Alternatively, in certain limited circumstances, we may be required to obtain your consent for the processing of your personal data, in which case you will be asked to expressly consent.

3.5 HOW DO WE PROTECT PERSONAL DATA?

We are committed to taking all reasonable and appropriate measures to protect the personal information we maintain from misuse, loss or unauthorized access. We do this by installing a series of appropriate technical and organizational measures. These include measures to deal with any suspected data breach.

3.6 HOW LONG DO WE KEEP PERSONAL DATA?

We typically process data throughout our interactions and then generally retain it for an appropriate period of time after separation with the customer. The precise amount of time depends on the type of data, our legitimate business needs and other legal or regulatory rules that may require us to retain it for certain minimum periods. There may also be some legal, regulatory or risk management requirements for retaining data, including where certain data may be relevant to any potential litigation (taking into account the relevant statute of limitations). Once we determine that we no longer need to store personal data, we will do one or more of the following:

- exclusion from our systems and destruction of hard copies,
- archiving personal data so that it is beyond use, or
- anonymize / hide relevant personal data.

3.7 HOW CAN CUSTOMERS ACCESS, CHANGE OR RECEIVE PERSONAL DATA PROVIDED TO US?

Subject to applicable law, customers may have several rights in relation to the processing of their data, listed below:

- **Access:** The customer can ask us to confirm and provide copies of the information we have about him at any time and to request his modification, update or deletion of such information.
- **Elimination:** The customer has the right to request that his personal data be deleted in certain circumstances.
- **Restrict Processing:** The customer has the right to request that we restrict our processing of personal data in certain circumstances.
- **Rectification:** The customer also has the right to request that we rectify any inaccuracy or lack of information in the personal data that we process or control.
- **Object:** This right allows the client to oppose us to the processing of his personal data.
- **Withdraw consent:** The customer can withdraw the consent we obtained to process their personal data for certain activities at any time (for example, for certain relationship management agreements or automatic profiles).

If the client wishes to exercise any of these rights, including the withdrawal of his consent for the processing of his personal data (where consent is our legal basis for the processing of his personal data), he may contact us through the channels established in the beginning of the relationship with Hawkclaw.