

## **ANNEX 2 – Full Disclosure of Information**

The Customer is informed that any personal data to be processed in the context of the Transfer, will be processed in accordance with the provisions of the EU Regulation n°2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the “GDPR”) and any applicable national data protection laws (including but not limited to the Luxembourg law of 1st August 2018 organizing the National Commission for data protection and the general system on data protection, as amended from time to time) (collectively hereinafter the “Data Protection Laws”), by CFCL (the “Data Controller”). This letter refers to the processing of personal data of any natural person related to it such as its contact person(s), employee(s), trustee(s), nominee(s), agent(s), representative(s) and/or beneficial owner(s) related to the Customer (the “Data Subject(s)”).

The data processed includes Data Subjects’ full name, age, e-mail, address, phone number, fax number, [account numbers], date of birth, nationality, citizenship, profession, identity number, passport number, identity card with photo, proof of address, tax identifiers, tax status, tax certificates, source of wealth, source of funds, bank account data, IBAN and BIC codes, PEP status, sanctions status, income, related parties, power of attorney status, client communications and any information regarding the dealing in shares (subscription, conversion, redemption and transfer) (the “Personal Data”). As part of its compliance with legal obligations such as AML/KYC, the Data Controller may be required to process special categories of Personal Data as defined by the GDPR, including Personal Data relating to political opinions as well as criminal convictions and offences. Personal data relating to political opinions of Customer having a public political exposure will be processed by the Data Controller on the basis of article 9, (2), e) of the GDPR (i.e. the Personal Data have manifestly been made public by the Data Subject).

The Customer undertakes and guarantees to inform the relevant Data Subjects of the content of the present section, in accordance with Articles 12, 13 and/or 14 of the GDPR.

(a) Personal Data supplied by the Customer are processed in order to enter into and execute the order routing services, in accordance with the OR-GTCs (i.e. to perform any pre-contractual measures as well as the contract entered into by the Customer), for the legitimate interests of the Data Controller and to comply with the legal obligations imposed on the Data Controller, such as (i) for compliance with requirements of any market infrastructure required to be used in the provision of CFCL's services or products to the Customer, (ii) by operation of any act, and (iii) performance of anti-money laundering (“AML”), countering the financing of terrorism (“CFT”) and know-your-customer (“KYC”) duties to ensure regulatory compliance.

The “legitimate interests” of the Data Controller referred to above are:

- (i) the provision of the proof, in the event of a dispute, of a transaction or any commercial communication as well as in connection with any proposed purchase, merger or acquisition of any part of the Data Controller’ business, to courts, regulators and authorities having jurisdiction over CFCL, its affiliates or any other third parties engaged by CFCL or its affiliates;

- (ii) compliance with foreign laws and regulations and/or any order of a foreign court, government, supervisory, regulatory or tax authority;
- (iii) risk management;
- (iv) to the extent the Customer is or becomes prospect or customer of other affiliate(s), this platform also provides for specific sharing of Customer data between the relevant entities, such data being limited to the Customer's AML, CTF and KYC data, as required by applicable laws, regulations and internal policies; and
- (v) exercising the business of the Data Controller in accordance with reasonable market standards.

The Personal Data may also be processed by the Data Controller' data recipients (the "Recipients") which, in the context of the above mentioned purposes and as mentioned under Article 21 of the OR-GTCs, refer to CBL, CFCL's affiliates or any third party (outsourcing), as well as any other Affiliates of Deutsche Börse AG, any third party that acquires, or is interested in acquiring or securitizing, all or part of the Data Controller' assets or shares, or that succeeds to it in carrying on all or a part of its businesses, or services provided to it, whether by merger, acquisition, reorganization or otherwise as well as any other third party supporting the activities of the Data Controller. The Recipients may, under their own responsibility, disclose the Personal Data to their agents and/or delegates (chain-outsourcing) (the "Sub-Recipients"), which shall process the Personal Data for the sole purposes of assisting the Recipients in providing their services to the Data Controller and/or assisting the Recipients in fulfilling their own legal obligations.

The Recipients and Sub-Recipients may be located either inside or outside the European Economic Area (the "EEA"). Where the Recipients are located in a country outside the EEA which benefit from an adequacy decision of the European Commission (such as Canada (commercial organisations), Israel, Japan, Jersey, New Zealand, Republic of Korea, Switzerland, the United Kingdom, and Uruguay), the Personal Data are transferred to the Recipients upon such adequacy decision. Where the Recipients are located outside the EEA in a country which does not ensure an adequate level of protection for Personal Data or does not benefit from an adequacy decision of the European Commission, the Data Controller and the Recipients have entered into legally binding transfer agreements respectively with the relevant Recipients and Sub-Recipients in the form of the European Commission approved model clauses or any other appropriate safeguards pursuant to the GDPR and put in place supplementary measures as may be necessary. In this respect, the Customer has a right to request copies of the relevant document for enabling the Personal Data transfer(s) towards such countries by writing to the Data Controller.

The Recipients and Sub-Recipients may, as the case may be, process the Personal Data as data processors (when processing the Personal Data on behalf and upon instructions of the Data Controller and/or the Recipients), or as distinct data controllers (when processing the Personal Data for their own purposes, namely fulfilling their own legal obligations).

The Personal Data may also be transferred to third-parties such as governmental, judicial, prosecution or regulatory agencies and/or authorities, including tax authorities, in accordance with applicable laws and regulations. In particular, Personal Data may be disclosed to the

Luxembourg tax authorities, which in turn may acting as data controller, disclose the same to foreign tax authorities.

In accordance with the conditions laid down by the Data Protection Laws, each Data Subject has a right to:

- access his/her Personal Data;
- correct his/her Personal Data where it is inaccurate or incomplete;
- object to the processing of his/her Personal Data;
- restrict the use of his/her Personal Data;
- ask for erasure of his/her Personal Data;
- ask for Personal Data portability.

Each Data Subject may exercise his/her above rights by writing to the Data Controller at the following address: 42, Avenue J.F. Kennedy L-1855 Luxembourg, Grand Duchy of Luxembourg.

Data Subjects also acknowledge the existence of their right to lodge a complaint with the *Commission Nationale pour la Protection des Données* (the “CNPD”) at the following address: 15, Boulevard du Jazz, L-4370 Belvaux, Grand Duchy of Luxembourg; or with any competent data protection supervisory authority of their EU Member State of residence.

Personal Data shall not be retained for periods longer than those required for the purpose of their processing subject to any limitation periods imposed by law.