

Privacy Statement RoTrend Diversified Fund

This privacy statement regards the processing of personal data of you as a participant in RoTrend Diversified Fund (the Fund). Transtrend B.V. (the Manager), as manager of the Fund and the sole managing director of Stichting Custody RoTrend Diversified Fund, the title holder of the Fund, is responsible for processing your personal data within the context of the Fund.

'Personal data' means any information relating to an identified or identifiable individual. It includes, for example, your name, your contact information, your date of birth, details from your passport, photographic or video images, communication records and any information the Manager may be legally required to obtain from you in the context of its (ongoing) customer due diligence.

The Manager will treat your personal data with care and in accordance with the applicable legislation, including the EU General Data Protection Regulation (GDPR). Keeping personal data secure is an important responsibility of the Manager. The Manager maintains physical, technical, electronic, procedural and organizational safeguards and security measures to protect personal data against accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure or access. The Manager's employees are bound by internal policies that require confidential treatment of personal data.

A. Processing of personal data

1. Participant data

The Manager processes data of you as a participant in the Fund, including your name, gender, contact details, residence, date and place of birth, nationality, tax identification number, bank account details, a copy of your passport and any (other) information the Manager may need to obtain from you in the context of customer due diligence. Data may also be obtained through a world-check database for checking against 'Politically Exposed Persons', bad press and sanctions lists. The Manager further processes details in relation to the value of your investment in the Fund, including your subscription(s) and, if applicable, your redemption(s).

Failure to provide certain requested information may result in the impossibility to invest or maintain to be invested in the Fund, may lead to incorrect reporting, and may be reported to the relevant authorities.

The processing of your personal data serves the following purposes:

- maintaining contact with you as a participant in the Fund;
- performing the Manager's duties under the Terms and Conditions of the Fund, including managing subscriptions and redemptions and providing any services related thereto;
- providing you with relevant information about your investment;
- providing you with periodic updates and newsletters;
- providing you with information that the Manager is legally required to provide; and
- compliance with legal and regulatory requirements on the field of inter alia tax, anti-money laundering and countering financing of terrorism.



The Manager processes your personal data because this is necessary for the performance of the contract that is in place with you (i.e. the Terms and Conditions of the Fund which you have agreed to by subscribing in the Fund), for compliance with legal obligations, or for the purposes of a legitimate interest the Manager has, each as described above.

The Manager will store your details during the course of your participation and for at least five years after the termination of your participation. If retention is necessary for the effective implementation of internal measures for the prevention or detection of money laundering or terrorism financing, the files will be kept on file for an additional five years. Your contact details will be stored for as long as is relevant to stay in contact with you. Any data may be archived or backed up on tape.

2. Transfer of personal data to third parties

For compliance with tax laws, the Manager is required to share certain of your personal data with the Dutch tax authority. This includes the information that you have provided in the 'self-certification form to establish tax residence' under the Common Reporting Standards ("CRS") and Foreign Account Tax Compliance Act ("FATCA"), as well as certain details with respect to your investment, such as the value of your investment. Such information may, where applicable, be shared by the Dutch tax authority with the tax authority of the country that you are a tax resident of and with the competent authorities of other permitted jurisdictions (which authorities may be located outside the European Economic Area), including the U.S., for the purposes provided for in FATCA, CRS or other applicable tax identification legislation to prevent tax evasion and fraud. The Manager may also be obliged to disclose certain of your personal data to the Dutch Financial Intelligence Unit.

Personal data will be shared with and may be accessible to the Fund's depositary to the extent necessary for the performance of its duties as described in the Terms and Conditions and Prospectus of the Fund. Such data consist of details with respect to the value of your investment and may also include information that the Manager has obtained from you in the context of customer due diligence. The Manager may further be required to share certain personal data with the Fund's brokers for the purpose of the broker's compliance with requirements in the field of tax, anti-money laundering and countering financing of terrorism. Such data consists inter alia of US tax forms (e.g. a W-8BEN form) filled out by you and percentage allocations.

The Manager may also share data with its affiliates, professional advisors and auditors, to the extent required. Any such party will be subject to obligations of confidentiality. Where possible and appropriate, any personal data transferred will be anonymized. The Manager may also have to transfer data to any court, governmental, supervisory or regulatory bodies, at the (authorized) request of a regulator or when this may be required pursuant to applicable regulations or any court order. Should this be the case, the Manager will use reasonable endeavors to notify you in advance of any such transfer, to the extent the Manager is allowed to do so.

The Manager may need to transfer personal data to parties that are located in countries outside of the European Economic Area (EEA) that are not recognized to provide an adequate level of data protection according to EEA standards. In such case, where necessary or appropriate, the Manager will adopt safeguards to ensure an appropriate level of protection of your personal data.



3. The Manager's overall privacy statement

Please be informed that the information in this statement sees to the processing of your personal data as a participant in the Fund specifically. The Manager has adopted a separate overall privacy statement, which can be found on its website: www.transtrend.com/en/privacystatement. Please refer to the overall statement for information about, among others, the use of the Manager's website and the related processing of personal data, recordings of communications and video recordings of visitors of the Manager's premises.

B. Requests related to personal data

You can contact the Manager if you have any of the following requests:

- Access to your personal data: if you wish, the Manager can provide you with an overview of your personal data processed by it.
- Rectification: you can request the Manager to rectify any inaccurate personal data.
- Erasure: you can request the Manager to erase any personal data that it holds of you.
- Restriction of processing: in certain circumstances, you may request the Manager to restrict the processing of your personal data.
- Data portability: in certain circumstances, you can request the Manager to provide you, in a structured, commonly used and machine-readable format, with the personal data that you provided to us earlier, and transmit this data to another party.
- Objection: where processing of your personal data is based on legitimate interests of the Manager, you have the right to object to such processing.

The Manager will endeavor to meet any of the above requests. There may however be circumstances in which the Manager will not be able to do so. For example, the Manager is not allowed to erase any information which it is legally required to retain. There may also be residual information that will remain within the Manager's databases and other records, which cannot be removed.

If you have any of the abovementioned requests, please contact the Manager via rotrendfunds@transtrend.com or + 31 10 453 6515. The Manager will respond to your request as soon as possible, but in any event within one month.

C. Complaints

If you have a complaint about the Manager's processing of your personal data, please do not hesitate to share this complaint with the Manager. You may also file a complaint with the competent authority of your home state. In the Netherlands, you can file a complaint with the *Autoriteit Persoonsgegevens*. Please refer to www.autoriteitpersoonsgegevens.nl.



D. Amendments

This privacy statement may be amended from time to time. The date of the latest amendment is 20 December 2019. Any update of this privacy statement will be distributed to participants. Maintaining your investment in the Fund following such update signifies acceptance of the revised statement.

E. Contact details

The Manager's mail address is:

Transtrend B.V.
P.O. Box 444
3000 AK Rotterdam
The Netherlands

The Manager's visitors address is:

Transtrend B.V.
Weena 723, unit C5.070
3013 AM Rotterdam
The Netherlands

If you have any questions about this privacy statement, please contact the Manager at rotrendfunds@transtrend.com or + 31 10 453 6515.