

## PRIVACY NOTICE

### Purpose of this notice

This privacy notice provides information regarding our processing of data, whether on individuals (including personal data in respect of individuals who are investors, intermediaries or other third parties that we interact with, or any individual who is connected to those parties) or otherwise. Where the data is held on individuals, this document also sets out the rights of those individuals in respect of that personal data.

If you are a natural person, this will affect you directly. If you are a corporate investor (including, for these purposes, a legal arrangement such as a limited partnership or trust) that provides personal data on natural persons connected to you for any reason in relation to your investment(s) in Proteus (defined below) (including for such purpose an investment in any segregated portfolio of Proteus), this will be relevant for those persons and you should transmit this privacy notice to them.

In this privacy notice, the terms "we", "us", "our" and "Proteus" refer to Proteus Feeder I Offshore SPC Ltd., a British Virgin Islands segregated portfolio company (company number 1958127), being recognised as a professional fund under the Securities and Investment Business Act, 2010 (as amended) of the British Virgin Islands, its affiliates and/or its delegates, unless the context otherwise requires.

### Your personal data

By virtue of making an investment in Proteus (including for such purpose an investment in any segregated portfolio of Proteus) and your associated interactions with us, you will provide us (including by submitting subscription documents, tax forms and associated documents and in correspondence and discussions with us) certain information ("**Personal Data**") that constitutes "personal data" under the Data Protection Act, 2021 of the British Virgin Islands (the "**DPA**"). We may also obtain Personal Data from public sources. Personal Data includes, without limitation, the following information relating to you and/or any natural persons connected with you as an investor: name, residential address, email address, corporate contact information, other contact information, date of birth, place of birth, passport or other national identifier details, national insurance or social security number, tax identification, bank account details and information regarding assets, income, employment, source of funds and investment history and risk tolerance.

Under the DPA, Proteus is a "data controller" and Proteus' affiliates and/or delegates may be "data processors" (or, in some circumstances, data controllers in their own right), in respect of your Personal Data.

We are obliged by legal or regulatory obligations to request certain Personal Data from you, and you are obliged to provide that Personal Data to us in order to make an investment in Proteus (including for such purpose an investment in any segregated portfolio of Proteus). Failure to provide any required information may result in a proposed investment being delayed or rejected.

### Purposes of processing

We process Personal Data for the purposes of:

- performing our contractual rights and obligations (including under Proteus' offering memorandum, subscription agreements, supplements and/or the memorandum and articles of association of Proteus), including to manage and administer your investment in Proteus, to send you updates, information and notices or otherwise correspond with you in connection with your investment in Proteus; and
- complying with our legal or regulatory obligations (including those relating to anti-money laundering and counter-terrorist financing, preventing and detecting fraud, sanctions, automatic exchange of tax information, requests from governmental, regulatory, tax and law enforcement authorities, beneficial ownership, maintaining statutory registers and record keeping).

Should we wish to process personal data for other specific purposes (including, if applicable, any purpose that requires your consent), we will contact you.

### Whom we transfer your personal data to

We may transfer your personal data to certain third parties, who will process your personal data on our behalf, including Proteus, LLC (investment manager to Proteus), Partners Admin LLC (administrator to Proteus), our affiliates, as well as other third party service providers that we appoint or engage to assist with the management, operation, administration and legal, governance and regulatory compliance of Proteus

# PROTEUS

Privacy Policy-BVI  
April 2023

(including its segregated portfolios). In certain circumstances, we may be required by law or regulation to transfer your personal data and other information with respect to your investment in Proteus (including for such purpose an investment in any segregated portfolio of Proteus) to governmental, regulatory, tax and law enforcement authorities. They may, in turn, exchange this information with other governmental, regulatory, tax and law enforcement authorities (including in jurisdictions other than the British Virgin Islands).

Where we are entering into an engagement with a third party pursuant to which data may be processed by that third party, we will seek to enter into an agreement with that third party setting out the respective obligations of each party and will seek to be reasonably satisfied that the third party has measures in place to protect data against unauthorised or accidental use, access, disclosure, damage, loss or destruction.

## **Transfer of your personal data outside the British Virgin Islands**

Your personal data may be transferred to jurisdictions that do not have data protection laws equivalent to the DPA. This may be necessary for one of a number of reasons, including for the performance of our rights and obligations under Proteus' offering memorandum, subscription agreements, supplements and/or the memorandum and articles of association of Proteus, under an agreement with a third party that is in your interests or in connection with international cooperation arrangements between governmental, regulatory, tax and law enforcement authorities.

## **How we safeguard your Personal Data**

We have entered into written agreements with the third parties that process your Personal Data on our behalf. These agreements require third parties to implement appropriate technical and organisational measures against unauthorised or unlawful processing of your Personal Data and against accidental loss or destruction of, or damage to your Personal Data, consistent with the DPA.

## **How long we retain your personal data**

We will retain your personal data for as long as we require it to perform our contractual rights and obligations, or for such longer period as required by our legal or regulatory obligations. In general, we will retain your personal data throughout your investment in Proteus (including for such purpose an investment in any segregated portfolio of Proteus). In accordance with applicable law, we will also retain certain of your personal data after you cease to be an investor in Proteus (including for such purpose an investment in any segregated portfolio of Proteus). As a general principle, we do not retain your personal data for longer than we need it.

## **Your rights**

Under the DPA, you have certain data protection rights, including the right to request access to your personal data, the right to have incomplete or inaccurate personal data corrected, the right to prevent processing of your personal data for the purposes of direct marketing and the right to complain to the British Virgin Island Office of the Information Commissioner, once the Information Commissioner has been appointed.

## **Questions or concerns**

If you have any questions or concerns about the contents of this privacy notice or our processing of your personal data, please contact Investor Relations:

- by post Proteus, LLC, 8900 Keystone Crossing, Suite 500, Indianapolis, Indiana 46240;
- by email [investorrelations@proteuscapital.us](mailto:investorrelations@proteuscapital.us); or
- by telephone on + 1 (888) 543-1190.

## **Changes to our privacy notice**

This privacy notice was last updated April 24, 2023. We have the right to update this privacy notice from time to time to reflect changing legal requirements or to reflect any changes in the way in which we process personal data. An updated privacy notice will be published on our website (<https://www.proteuscapital.us/>) and will take effect as soon as it is made available via that website.