

Bluewater Capital Ltd. - Notice of EU Privacy Policy

Bluewater Capital Ltd. (the "**Investment Manager**") is committed to protecting your privacy and maintaining the confidentiality and security of your personal information. Any personal information processed by the Investment Manager is controlled by the Investment Manager, and the Investment Manager is the data controller of your personal information. When your details are provided to the Investment Manager as a consequence of your investment (or potential investment) in a private investment fund sponsored by Bluewater Capital Ltd. (each, a "**Fund**"), then the Investment Manager, acting as a data controller, may itself (or through a third party (the "**Administrator**") acting in its capacity as the Fund's administrator) process your personal information or, if you are an entity, that of your (i) beneficial owner(s), (ii) employees, and (iii) directors, officers, trustees, general partners, managers, or other persons serving in a similar capacity (as distinguished from the entity itself) (the foregoing collectively, "**Your Personal Information**"). When processing Your Personal Information, the Administrator may also act as a data controller.

The Investment Manager's European Union representative is located in the Channel Islands at Esplanade Jersey, JE1 OBD and can be contacted at Carey Olsen Jersey LLP 47.

This policy (the "**EU Privacy Policy**") explains the manner in which the Investment Manager collects, utilizes, and maintains nonpublic personal information about investors and potential investors ("**Investors**") based in the European Union ("**EU**") or the European Economic Area ("**EEA**"), as required under the General Data Protection Regulation (EU) 2016/679 ("**GDPR**"). This EU Privacy Policy applies to your investment or potential investment in the Fund.

Collection of Your Personal Information

The Investment Manager collects Your Personal Information from the following sources, as applicable:

- subscription documents and other information provided by the Investor in writing, in person, by telephone, electronically, or by any other means (this information includes name, address, income, financial and investment qualifications, tax-related information, birth date, nationality, passport or other identification number, and employment information);
- transactions within the Fund, including account balances, investments, redemptions, and management fees and performance allocations; and
- other interactions with the Investment Manager (for example, discussions with our staff).

Why We Use Your Personal Information

Your Personal Information may be processed by the Investment Manager and/or the Administrator (or any of their affiliates, agents, employees, delegates, or subcontractors) for the following purposes, as applicable:

- to facilitate your investment in the Fund and the management and administration of your investment in the Fund on an ongoing basis (the "Services") as necessary to fulfill all contractual and regulatory obligations related to your investment in the Fund, including without limitation the acceptance and processing of subscription documents and redemption and transfer requests;
- in order to carry out anti-money laundering checks and related actions that the Investment Manager and/or Administrator considers appropriate or necessary to fulfill any of their legal obligations on an ongoing basis (i) with respect to the prevention and/or detection of fraud, money laundering, terrorist financing, bribery, corruption, and/or tax evasion and (ii) to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions, all of the foregoing in accordance with the Investment Manager's and the Administrator's anti-money laundering policies and procedures;
- to comply with their legal obligations and, in particular, to report tax-related information to tax authorities;
- to disclose information to other third parties such as service providers of the Investment Manager and/or Administrator (including, for example, attorneys, accountants, auditors, or other professionals), regulatory authorities, and technology providers in order to comply with any legal obligation imposed on the Investment Manager and/or Administrator or in order to pursue the legitimate interests of the Investment Manager and/or Administrator;
- to monitor and record electronic communications and if applicable, calls, for any of the purposes specified herein; and/or
- to otherwise pursue the legitimate interests of the Investment Manager and/or Administrator relating to your investment or your potential investment in the Fund and/or where the processing of Your Personal Information would be in the public interest.

Countries Having Access to Your Personal Information

The Investment Manager's servers, which store and keep Your Personal Information, are located in the Channel Islands.

The Investment Manager also has service providers whose personnel will have access to Your Personal Information and that are located in other jurisdictions. Transfers to these service providers are necessary for the performance of the contract between the Investment Manager and the Investor. These jurisdictions either (i) afford an adequate level of protection for Your Personal Information (as declared by the European Commission) or, (ii) if they do not, then the Investment Manager has entered into agreements with these service providers incorporating clauses that are the same as or substantially similar to the standard contractual clauses, as well as other relevant provisions contained in the GDPR, and impose obligations no less onerous than those contained in this EU Privacy Policy.

Collecting Investor Information Legally

The Investment Manager and the Administrator are able to legally collect and use Your Personal Information because

- you have consented to their doing so;
- it is necessary for the performance of a contract to which the Investor is a party or in order to take steps at the request of the Investor prior to entering into a contract or to otherwise perform the Services;
- collecting and using Your Personal Information is necessary for the Investment Manager and/or the Administrator to fulfill their legitimate business interests, which may include to investigate, defend against, or prosecute any actual, threatened, or potential claim in a court of law or other judicial or regulatory forum or otherwise protect their legal rights; and/or
- it is necessary to comply with any applicable regulatory, judicial, or other legal obligations applicable to Investment Manager and the Administrator.

Retention of Investor Information

The Investment Manager and the Administrator will retain Your Personal Information for the purposes described in 1, 2, and 3 in the immediately preceding paragraph for as long as required for the purposes described above.

In particular, and without limitation to the foregoing, the Investment Manager and the Administrator have obligations imposed on them under applicable legal systems that require them to retain Your Personal Information for certain minimum time periods.

Your Rights

You have the right to

- be informed, as this EU Policy seeks to do, about Your Personal Information that the Investment Manager and/or the Administrator collects from you, uses, and retains;
- obtain confirmation from the Investment Manager that Your Personal Information is being collected, used, and retained as described above and access Your Personal Information held by the Investment Manager and/or the Administrator;
- have Your Personal Information corrected if it is inaccurate or incomplete at any time;
- erasure (or the right to be forgotten) which means you can request deletion or removal of any of Your Personal Information the Investment Manager and/or the Administrator holds at any time, subject to the Investment Manager's or the Administrator's rights to retain Your Personal Information as provided under the GDPR;

- block or suppress the Investment Manager's and/or the Administrator's collecting and using Your Personal Information, which means the Investment Manager and the Administrator can continue to store Your Personal Information but cannot further collect or use it in any way;
- obtain and reuse any of Your Personal Information that the Investment Manager and/or the Administrator holds for your own purposes across different services, which allows you to move, copy, or transfer Your Personal Information easily from the Investment Manager and/or the Administrator to another place identified by you to the Investment Manager in a safe and secure way without hindrance to the usability of Your Personal Information;
- object to the Investment Manager's and/or the Administrator's collecting, using, or retaining Your Personal Information when this is based on
 - your legitimate interest or the performance of a task in the public interest or
 - your desire not to receive direct marketing even if otherwise legally permitted; and
- withdraw your consent to the use of Your Personal Information at any time, as described below.

To make any requests as listed above, please contact the Investment Manager at info@bluewater.capital.

The Investment Manager will respond to requests relating to your rights above within one month of receipt of your request or within two months of receipt of your request when the request is more complex.

Withdrawal of Your Consent

You can tell the Investment Manager to stop collecting, using, and retaining Your Personal Information at any time by emailing the Investment Manager at info@bluewater.capital. You should note that notwithstanding your withdrawal of consent, the Investment Manager and the Administrator may be legally required to retain some or all of Your Personal Information.

When the Investment Manager or the Administrator requires Your Personal Information to comply with AML or other legal requirements, failure to provide this information will mean that you will be unable to be accepted as an investor in the Fund and/or may be mandatorily redeemed from the Fund if you are already an Investor.

Protection of Investor Information

The Investment Manager maintains appropriate technical and organizational measures to ensure a level of security appropriate to address potential risks, including physical, electronic, and procedural safeguards that comply with the GDPR to protect customer information, including

- the pseudonymization and encryption of Your Personal Information when appropriate;
- ensuring the ongoing confidentiality, integrity, availability, and resilience of processing systems and services;
- ensuring that the Investment Manager can restore access to Your Personal Information in a timely manner if a physical or technical incident occurs; and
- regular testing, assessment, and evaluation of the effectiveness of its technical and organizational measures to attempt to ensure Your Personal Information is secure.

The Investment Manager restricts access to the personal and account information of Investors to those employees who need to know that information in the course of their job responsibilities. The Investment Manager will destroy, erase, or make unreadable data, computer files, and documents containing Your Personal Information that is nonpublic prior to disposal.

Making a Complaint

If you would like to make a complaint about the way the Investment Manager has collected, used, or retained Your Personal Information, please contact us at info@bluewater.capital.

You have the right to lodge a complaint with a supervisory authority in the EU Member State of your habitual residence or place of work, or place of the alleged infringement if you consider that the processing of Your Personal Information carried out by the Investment Manager or its service providers infringes the GDPR.

Former Customers and Investors

This EU Privacy Policy also applies to former Investors in the EU and the EEA.

Further Information

This EU Privacy Policy is in addition to the Investment Manager's existing Privacy Policy adopted under Channel Islands law, a copy of which is available from the Investment Manager. The Investment Manager reserves the right to change this EU Privacy Policy at any time and without prior notification. The examples contained within this EU Privacy Policy are illustrations and are not intended to be exclusive. This EU Privacy Policy is intended to comply with the GDPR regarding privacy. You may have additional rights under other foreign or domestic privacy laws. If you have any questions about this EU Privacy Policy, please call or email us at info@bluewater.capital . No further action is required on your part.