

GSA Coral Portfolio S.C.A. SICAV-SIF Privacy Statement

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What is the purpose of our privacy statement?

Under the Data Protection Legislation, GSA Coral Portfolio SICAV-SIF (the “**Fund**”) is required to provide an explanation as to why we require you to provide certain personal information (also known as “personal data”) relating to you; how we intend to use the personal information you provide to us; and whether or not we will share that information with anyone else.

Data Protection Legislation

In these privacy statements, “Data Protection Legislation” means all laws, subordinate legislation, enactments and regulations relating to the processing, privacy and use of personal data, as applicable to the Fund, as in force and applicable from time to time and as the same may be amended, supplemented or replaced.

Who are we?

GSA Coral Portfolio SICAV-SIF is a Luxembourg domiciled investment fund which aims to provide long term capital growth through investment opportunities in student accommodation globally. The Fund is only available to “well-informed” investors as defined under the Luxembourg specialised investment fund law of 13 February 2007.

Should you wish to contact us, our address is: GSA Coral Portfolio S.C.A. SICAV-SIF, 2 Boulevard de la Foire, L-1528 Luxembourg, Grand Duchy of Luxembourg, should you wish to contact us in writing. Alternatively, you may contact us by visiting the “Contact Us” section of this website or emailing us at info@gsa-coral.com

Where your details are provided to the Fund as a consequence of your investment in the Fund, the Fund, acting as a data controller, may itself, (or through a third party such as Apex Fund Services (Malta) Limited, Luxembourg Branch (the “**Administrator**”) acting in its capacity as the Fund’s administrator) process your personal information or that of your directors, officers, employees and/or beneficial owners. When processing your personal information, there may also be times where the Administrator will act as a data controller. For further information on the privacy policy of the Administrator, please refer to its website.

This privacy statement applies to personal information collected by the Fund. It does not apply to any personal information that is collected by third parties, individuals, other organisations or other websites which GSA may be linked from or linked to. In the case of any third parties collecting your personal information, their own privacy policies will apply.

What information are we collecting?

The Fund limits the personal information it collects to the personal information required to provide the services you have requested or to enter into a contract with the Fund when you are investing into the Fund. You may provide that information to us via our website enquiry form, over the telephone, via email, in person or through a subscription agreement. The types of personal information we collect may include, for example:

- Name;
- Postal address;
- Telephone and fax;
- Email;
- Employer(s) details (if applicable);
- Source of funds;
- Source of wealth;
- Bank details;
- Tax information;
- Confirmation of 'well-informed' investor status; and
- Any other interested party details (including name, address, telephone, fax and email).

Why are we collecting your information?

In order to provide you with the service you have requested or to process your investment into the Fund, we require certain personal information be shared with us and/or the Administrator. Such personal information may be provided to us via channels such as email, our website enquiry form, over the telephone, in person or when completing a subscription agreement. Without this information, it would not be possible for us to provide you with the service you have requested or to accept your investment into the Fund.

What do we do with your information?

The Fund and/or the Administrator acting on behalf of the Fund will use the personal information you provide to us in the following ways:

- To contact you in response to your initial enquiry, and any other follow up communications between us;
- To engage and make contact with you in the method you have requested;
- To facilitate the opening of your account with the Fund;
- To manage and administer your holdings in the Fund and any related account on an on-going basis which are necessary for the performance of your contract with the Fund, including without limitation, the processing of redemption, conversion, transfer and additional subscription requests and the payment of distributions (where applicable);

- To carry out anti-money laundering (“AML”) checks and related actions which the Fund considers appropriate to meet any legal obligations imposed on the Fund relating to, or the processing in the public interest or to pursue the Fund’s legitimate interests in relation to, the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions, on an ongoing basis, in accordance with the Fund and the Administrator’s anti-money laundering procedures;
- To report tax related information to tax authorities in order to comply with a legal obligation;
- To monitor and record calls and electronic communications for (i) processing and verification of instructions, (ii) investigation and fraud prevention purposes, (iii) for crime detection, prevention, investigation and prosecution, (iv) to enforce or defend the Fund and its affiliates’, itself or through third parties to whom it delegates such responsibilities or rights in order to comply with any legal obligation imposed on the Fund, (v) to pursue the Fund’s legitimate interests in relation to such matters or (vi) where the processing is in the public interests;
- To disclose information to other third parties such as service providers of the Fund, auditors, regulatory authorities and technology providers in order to comply with any legal obligation imposed on the Fund or in order to pursue the legitimate interests of the Fund;
- To monitor and record calls for quality, business analysis, training and related purposes in order to pursue the legitimate interests of the Fund to improve its service delivery;
- To update and maintain records and fee calculation; and
- To retain AML and other records of individuals to assist with the subsequent screening of them by the Administrator including, in relation to other funds or clients of the Administrator in pursuance of the Administrator’s and its clients’ legitimate interests;

And any other processing activities which are necessary to comply with the Fund and/or the Administrator’s legal obligations and/or any other processing activities which are necessary for the Fund and/or the Administrator’s legitimate interests indicated above and/or the processing is in the public interest.

Your personal information will be used by the Fund in accordance with this privacy statement and also in accordance with your rights under the Data Protection Legislation.

The personal information collected by the Fund from you will be securely stored by us in accordance with our internal data protection policies and procedures which have been assessed to ensure they meet the requirements set out under the Data Protection Legislation. Any personal information collected by the Administrator on behalf of the Fund will be stored in accordance with its own internal data protection policies and procedures.

Do we share your personal information?

It is necessary for the Fund to share your personal information with our service providers in order to provide you with the services you have requested and to meet and fulfil our regulatory obligations. The Fund has assessed its service providers to ensure they have appropriate data protection safeguards and frameworks in place to allow them to comply with the requirements of the Data Protection Legislation.

Within the terms and conditions of our contracts with our service providers, it is clearly stated that such service providers are not permitted to share your personal information with any parties outside the Fund structure and are only to use the information in the course of their work on behalf of the Fund.

The Fund and the Administrator may also, from time to time, also be required to share your information with regulators, crime prevention agencies and other organisations who are permitted access to such personal information as a matter of law.

Do we transfer your personal information abroad?

The Fund may need to disclose personal information to third parties set out above, may involve the transfer of data to the USA and other jurisdictions outside the European Economic Area (“EEA”) in accordance with the requirements of the General Data Protection Regulation (“GDPR”). Such countries may not have the same data protection laws as your jurisdiction. Accordingly, your personal information will only be transferred when there are appropriate Standard Contractual Clauses which provide the framework in which your personal information will be stored in accordance with the protections required under the GDPR or where there is a legal obligation to do so.

What security measures concerning your personal information do we have in place?

The Fund ensures that any personal information you provide to us is securely stored on our systems and servers and that any paper-based records of your personal information will be stored and destroyed in accordance with our data retention policies and procedures. We treat data security with the utmost seriousness and take appropriate measures to implement industry leading standards to protect your personal information. Where the Administrator stores your personal information, the Administrator maintains its own security measures which have been assessed by the Fund and deemed adequate to meet the standards set by the GDPR. For further information on the Administrator’s security measures, please contact the Administrator directly.

The Fund further ensures that only relevant members of staff have access to your personal information. This is achieved by our Data Access Policy which provides that your personal information will only be available to relevant members of staff who have a legitimate reason for accessing your personal information.

Can we use your information for any other purpose?

The Fund may wish to market its products and services to you. However, if you do not positively opt to receive such marketing, we will not contact you for this purpose.

The Fund will not use your personal information for any purpose other than providing the services you have requested or responding to the query you have raised, as a consequence of

your investment into the Fund and, if you have explicitly consented for it to do so, for its own marketing purposes.

How do we store your personal information and when do we delete it?

The Fund ensures your personal information is stored on a database that is specific to your enquiry or related to your investment into the Fund. That database provides the Fund with your personal information and allows us to respond to your enquiry as well as sending you marketing emails, but only if you have opted to receive such materials.

Where you have invested into or are in the process of applying to invest into the Fund, your personal information is stored in accordance with the Administrator's own internal data retention policies. For information on the Administrator's data retention policies, please contact the Administrator directly. Following an enquiry from you, we will hold your data for as long as required for the Fund or the Administrator to perform the services required to fulfil our contract with you or perform investigations in relation to the same depending on whether additional legal/regulatory obligations mandate that the Fund and/or the Administrator retains your personal information. In the event of an enquiry to the Fund, the Fund will retain your personal information for no more than 12 months. At the end of the 12-month retention period, if you have not entered into a contract with us, your personal information will be destroyed and/or deleted from our records.

In certain circumstances, the Fund and the Administrator also have various regulatory obligations which dictate the length of time your personal information is held on our systems and servers.

What are your rights?

The GDPR provides individuals with the following rights:

- The right to be informed

This provides you with the right to be informed about the collection and use of your personal data, the purposes for which we process your personal information, our retention periods in relation to your personal information and those with whom we will share your personal information.

- The right of access

You have the right to access the personal information we hold on you, together with certain supplementary information. This allows you to be aware of and verify the lawfulness of the processing of your personal information by GSA and the accuracy of the personal information we hold on you.

- The right to rectification

If any of the personal information we hold on you is inaccurate or incomplete, you have the right to require that it be corrected and completed as appropriate. You can make a request for us to rectify your personal data verbally or in writing and GSA has one calendar month to respond to your request for rectification.

- The right to erasure

Under the Data Protection Legislation, you have the right to request that your personal information is erased from our systems and servers (this is also known as 'the right to be forgotten'). Where your personal information has been shared by GSA with third parties (either other companies within the GSA group or our third-party service providers), you also have the right to request that your personal information will be deleted by these third parties. As per your right to rectification, you can request us to erase your personal information verbally or in writing and GSA has one calendar month to respond to your request for erasure. Please note that this right is not absolute and only applies in certain circumstances.

- The right to restrict processing

You have the right to request that GSA restricts or suppresses your personal information. Again, you can request that we restrict our processing activities either verbally or in writing and GSA has one calendar month to respond to your request. Again, this right is not absolute and only applies in certain circumstances. For example, you may decide that you do not want us to use your personal information for marketing purposes. This would involve us deleting your personal information from our marketing databases.

- The right to data portability

Under the Data Protection Legislation, you have the right to obtain and reuse your personal information for your own purposes. That right allows you to move, copy or transfer your personal information easily from one IT environment to another in a safe and secure way, without hindering its usability. This information must be provided free of charge and be provided within one calendar month of request.

- The right to object

You have the right to object to your personal information being processed for direct marketing (including profiling). Upon request, the Fund and/or the Administrator is obliged to stop processing your personal information for such purposes and do so free of charge.

- Rights in relation to automated decision making and profiling

The Data Protection Legislation contains rules which aim to protect individuals where there is solely automated decision-making that has legal or similarly significant effects on them. If you have any concerns that your personal information is being used for this type of activity then

please contact either the Fund at info@gsa-coral.com or the Administrator at ApexInvestorsServicesLU@apexfunds.lu

In short, you have the right to

- Request access to your personal information
- Request we rectify any inaccurate or incomplete personal information
- Request that we erase the personal information we hold on you and take steps to ask others with whom we have shared your information to also erase it
- Request that we limit what we do with your personal information
- Object to our use of your personal information and ask us to stop that use
- Instruct us to provide you with the information we hold about you in a structured and commonly used format or transmit that information directly to another organisation.

Where the Fund or the Administrator requires your personal information to comply with AML or other legal requirements, failure to provide this information means the Fund may not be able to accept you as an investor in the Fund.

Our obligations to comply with the above rights are subject to certain exemptions and further information on these exemptions can be obtained by contacting the Fund at info@gsa-coral.com or the Administrator at ApexInvestorsServicesLU@apexfunds.lu

In the event that the Fund or the Administrator is using your personal information because you have provided consent for us to do so, you can withdraw that consent at any time. This can be done either in writing or verbally by telephone at any time. The lawfulness of our use of your information before consent was withdrawn is not affected.

To exercise any of the rights referred to above, you should contact the Fund either in writing to: GSA Coral Portfolio S.C.A. SICAV-SIF, 2 Boulevard de la Foire, L-1528 Luxembourg, Grand Duchy of Luxembourg, should you wish to contact us in writing. Alternatively, you may contact us by visiting the “Contact Us” section of this website or emailing us at info@gsa-coral.com or the Administrator at ApexInvestorsServicesLU@apexfunds.lu

You also have the right to complain with a supervisory authority in the EU Member State of your habitual residence or place of work or in the place of the alleged infringement if you consider that the processing of your personal information carried out by the Fund or its service providers infringes the Data Protection Legislation.

What is the legal basis for using your information?

The Fund is required to have a “legal basis” for collecting, processing and storing your personal information. Under the Data Protection Legislation, there are six available lawful bases which allow for us to process personal information. These are:

- Consent
- Contract

- Legal obligation
- Vital interests
- Public task; and
- Legitimate interests.

The Fund will respond to your original enquiry and any further follow ups related to that original enquiry through **Legitimate Interests**. If you have consented to us contacting you for marketing purposes, the legal basis for us contacting you for such purposes is **Consent**. If you enter into a contract with the Fund through an investment in the Fund, the legal basis for our relationship is **Contract**.