

Data Protection & Privacy Policy

This Data Protection & Privacy Policy (“Policy”) sets out how Montecristo Time and its affiliated entities collect, process, store, and protect personal data in accordance with the General Data Protection Regulation (EU) 2016/679 (“GDPR”) and the Dutch implementation law (AVG – Algemene Verordening Gegevensbescherming).

1. Scope and Applicability

This Policy applies to all entities within the Montecristo Time group structure:

1. Montecristo Time Global B.V. – the fund manager (AIFM), responsible for determining the purpose and means of data processing (data controller);
2. Montecristo Time Stocks B.V. – the investment fund (AIF), acting as a data processor on behalf of Montecristo Time Global B.V.

This Policy applies to all categories of data subjects, including investors, employees, suppliers, service providers, and business partners.

2. Purpose of Processing

Montecristo Time processes personal data only for legitimate business purposes, including but not limited to:

- Managing investor relations and fund subscriptions;
- Fulfilling contractual and legal obligations under Dutch and EU law;
- Conducting due diligence (AML/CFT and KYC requirements);
- Maintaining employee records and payroll administration;
- Managing supplier and partner relationships;
- Ensuring security, compliance, and communication within the organization.

3. Legal Basis for Processing

All personal data is processed based on one or more of the following lawful bases under Article 6 GDPR:

- The necessity of processing for the performance of a contract (Article 6(1)(b));
- Compliance with a legal obligation (Article 6(1)(c));
- The legitimate interests pursued by Montecristo Time (Article 6(1)(f));
- The consent of the data subject, where required (Article 6(1)(a)).

4. Categories of Data Processed

Depending on the relationship with the data subject, Montecristo Time may collect and process the following types of personal data:

- Identification data: name, date of birth, nationality, address, and identification number;
- Contact data: email address, phone number, correspondence records;
- Financial data: bank details, payment history, investment amounts;
- Employment data: CVs, contracts, performance records, payroll information;
- AML/CFT data: identity documents, PEP status, and beneficial ownership information.

5. Data Retention

Personal data is retained only for as long as necessary to fulfil the purpose for which it was collected, and in compliance with statutory obligations under Dutch law.

Retention periods include:

- Investor and transaction records: minimum of 5 years (in line with AML/CFT regulations);
- Employee data: up to 7 years after termination of employment;
- Financial and accounting records: up to 10 years for fiscal compliance.

6. Data Security Measures

Montecristo Time applies appropriate technical and organizational measures to ensure data protection, including but not limited to:

- Encrypted communications and data storage;
- Restricted access based on role and authorization;
- Regular cybersecurity audits and penetration testing;
- Secure destruction of obsolete documents and records.

7. Data Sharing and Third Parties

Personal data may be shared with regulated service providers such as auditors, notaries, legal advisors, and financial institutions, strictly for operational or compliance purposes. All third parties are bound by confidentiality and data protection obligations consistent with GDPR requirements.

Montecristo Time does not sell or transfer personal data for marketing purposes.

8. Rights of Data Subjects

Data subjects have the following rights under GDPR:

- Right of access to personal data;
- Right to rectification or erasure (“right to be forgotten”);
- Right to restriction of processing;
- Right to data portability;
- Right to object to processing;
- Right to withdraw consent at any time, where applicable.

Requests can be submitted in writing to the contact address provided below. Montecristo Time Global B.V. will respond within 30 days as required by law.

9. International Data Transfers

Montecristo Time does not transfer personal data outside the European Economic Area (EEA).

If future transfers are required, such transfers will only occur to jurisdictions offering adequate protection or with appropriate safeguards under Articles 44–49 GDPR.

10. Data Protection Governance

Montecristo Time Global B.V. acts as the Data Controller for the Montecristo Time group. Internal data protection oversight is carried out by the management of Montecristo Time

Global B.V. in cooperation with the group's compliance officer.
Training and awareness sessions are conducted periodically for all staff and service providers.

11. Contact Information

For any questions, complaints, or data access requests, please contact:

Montecristo Time Global B.V.
Blondeelstraat 96
3067 VA Rotterdam
The Netherlands

Email: info@montecristotime.com

Data Protection Officer: Management of Montecristo Time Global B.V.

Supervisory Authority: Autoriteit Persoonsgegevens (Dutch Data Protection Authority)

Website: www.autoriteitpersoonsgegevens.nl

12. Policy Review and Approval

This Policy is reviewed annually or when significant legal or organizational changes occur. It has been approved by the Board of Directors of Montecristo Time Global B.V. and applies to all group entities as of the date below.

Adopted on: 16/02/2026

Signed by: The Management Board of Montecristo Time Global B.V.