

## Privacy Notice

This Privacy Notice applies to **Perren Capital Management Ltd its subsidiaries, and affiliates** (collectively, "we," "our," "us," or "**Perren**"). We are committed to safeguarding the privacy of our clients, business partners, and website visitors (collectively, "you") and protecting the personal information you share with us. This Privacy Notice outlines how we collect, use, share, and protect your personal information in accordance with the Bermuda Personal Information Protection Act 2016 ("PIPA").

### 1. Who we are

We are an ILS fund manager specializing in fully collateralized property and specialty reinsurance, based in Bermuda. If you have any questions or concerns about this Privacy Notice or how we process your personal information please contact our Privacy Officer via the details below.

### 2. What we Collect

We may collect the following categories of personal information:

- **Contact Information:** Name, email address, physical address, telephone numbers, (including business contact details) from parties that we work with such as brokers, service providers, suppliers, professional advisors;
- **Financial Information:** this includes your transactions and account positions with us or other financial institutions or representatives;
- **Background Information or KYC:** Information required for Know Your Customer (KYC) processes or other requisite documentation completed by you or your representative and provided to us or our administrators or outsourced service providers in order to meet our legal obligations, such as those related to anti-money laundering and KYC requirements;
- **Professional Information:** Job title, employer;
- **Other Information:** Any other information necessary for providing our services such as making a general inquiry or users of our website.

We only collect personal data that is necessary for the provision of services we provide to comply with legal obligations and fulfilling our business relationship with you.

### 3. How We Collect Your Personal Information

We collect personal information through:

- **Direct interactions:** when you or your authorized representatives provides personal data to us, such as through our website forms, emails, or phone calls;
- **Third-party service providers:** Information shared by brokers, investment managers, or other representatives;
- **Publicly available sources:** Social media platforms, public registers or other public databases.

### 4. How We Use Your Personal Information

We use your personal information for various purposes depending on our relationship with you which may include (but may not be limited to) the following:

- **Provide services and fulfill our contractual obligations**, including providing services requested by our clients that may involve interacting with you;
- **Confirming and verifying your identity and conducting due diligence** including anti-money laundering and terrorist financing checks, (note: this could be ongoing, not once);
- **Conducting internal operations**, statistical analysis and general business purposes;
- **Complying** with any of the Company's global legal, regulatory or compliance obligations;
- **Obtaining legal advice** or establishing, exercising or defending our legal rights or otherwise for the purpose of, or in connection with, any legal proceedings (including prospective legal proceedings); and
- **Detecting and preventing fraud** or other criminal activities.

We process your data based on contractual obligations, legitimate interests or legal compliance as outlined in Section 5.

## 5. Legal basis for processing personal data

We rely on the following legal bases to process your personal information, which include, but are not limited to the following:

- **Legitimate Business Interest:** We process data to fulfill or perform contractual obligations, provide requested services that we have mutually agreed upon or legitimate business interests (e.g. fraud detection, customer relations);
- **Compliance with legal obligations:** We process personal information to comply with legal and regulatory requirements, respond to requests under data protection laws, and establish or defend legal rights.
- **Fraud detection or prevention:** Processing is necessary to detect, prevent, and respond to fraud or other illegal activities.
- **Consent:** In certain circumstances we may rely on your consent to process your personal data such as when you opt-in to marketing communications. You have the right to withdraw your consent at any time, without affecting the lawfulness of processing before consent is withdrawn.

## 6. Disclosure of Personal Information

We may share your personal information in the following circumstances with:

- **Authorized Third Parties and Service providers:** These entities assist us in conducting business operations, such as legal and financial service providers. We require third-party providers to adhere to the same high standards of data protection through contractual obligations.
- **Other Parties when required by Law or as necessary:** We may disclose your personal information to our affiliates and other entities, which may be legal or government authorities or third parties in connection with claims, disputes, litigation or investigations where we reasonably believe that

disclosure is required by law or pursuant to legal process, or is necessary to establish, exercise or defend legal claims, including to protect or defend your rights, property or security to ours.

- **Transfer of Assets:** If we undergo a merger, acquisition, or sale of assets, your personal information may be transferred as part of that transaction.
- **Third parties:** We may share your personal information with third parties with your explicit consent or as necessary for legal compliance.

We do not knowingly collect personal information from children and will delete any such data if we become aware of its collection.

When required by applicable law, we will obtain your explicit consent before sharing your data with any third parties. On request and where required by law, we will confirm the name of each third party to which your personal data has, or will be, transferred. To the extent permitted by applicable law, we disclaim all liability for the use of your personal data by third parties.

## **7. Safeguarding Your Personal Information**

We implement physical, electronic, and procedural safeguards with commercially reasonable practices to protect your Personal Information from loss, misuse, unauthorized access, disclosure or alteration, in accordance with applicable data protection and privacy laws. While we strive to protect your data, no method of transmission over the internet is completely secure, we cannot guarantee complete security.

## **8. Transfer of Information**

**Transfer to Third Parties.** In the course of conducting our business, we may engage third parties to assist with various operations. We make reasonable efforts to ensure third parties are bound by the terms of this Personal Data Privacy Notice or a similar policy maintaining the confidentiality and security of your personal information.

**International Transfers.** Our primary operations are based in Bermuda but your personal information may be transferred to jurisdictions outside Bermuda for processing with service providers in another jurisdiction. We ensure appropriate safeguards are in place to protect your data during these transfers, including standard contractual clauses approved by local regulators.

We will only transfer data to a country considered to have an adequate level of protection. In cases where a country does not have equivalent privacy laws, we will implement appropriate safeguards, including compliance with applicable laws and the use of standard contractual clauses approved by local data protection regulators, to ensure your personal data receives an adequate and consistent level of protection.

## **9. Retention of Personal Information**

We retain your personal information for as long as reasonably necessary to fulfill the purposes outlined in this Privacy Notice and comply with legal obligations. Information no longer needed will be securely deleted or de-identified based on our Data Retention Policy.

## **10. Your Rights**

Depending on your jurisdiction, you may have certain rights regarding your personal information. These rights may include:

- **Access:** You can request access to the personal information we hold about you;
- **Correction:** You can request that we correct inaccuracies in your personal information;
- **Deletion:** you can request the deletion of your personal information when it is no longer necessary for the purposes for which it was collected, or if you withdraw consent;
- **Restriction:** You can request that we restrict the processing of your personal information under certain circumstances;
- **Objection:** You can object to the processing of your personal information based on legitimate interests or for direct marketing purposes;
- **Data Portability:** You can request to receive your personal information in a structured, commonly used, and machine-readable format, or request that it be transmitted to another data controller.
- **Withdrawal or consent:** If you have provided consent for the processing of your personal information, you may withdraw that consent at any time. Please note withdrawing consent does not affect the lawfulness of processing based on consent before its withdrawal.

If you wish to exercise any of these rights, please contact us via the details below. We will comply with your request unless we have compelling legitimate or legal grounds to continue processing your information.

## 11. Complaints Information

In the event that you wish to make a complaint, you can do so at any time by referring the matter in the first instance to: [compliance@perrencapital.bm](mailto:compliance@perrencapital.bm).

## 12. Contact Us

If you have any questions or concerns about this Privacy Notice or our data protection practices, please contact our Privacy Officer at: [compliance@perrencapital.bm](mailto:compliance@perrencapital.bm).

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## 13. Updates to this Privacy Notice

We may update this Privacy Notice from time to time. When we make significant changes, we will notify you via email or prominently on our website. We encourage you to review this Privacy Notice periodically to stay informed about our privacy practices.

**Note:** This Privacy Notice is intended to provide a general overview of our privacy practices. For specific inquiries or detailed information, please contact us directly.

**Updated: 18 September 2025**