

PRIVACY NOTICE

Updated: 25 May 2018

1. THE PURPOSE OF THIS NOTICE

This privacy notice describes how the personal data provided in respect of DP Aircraft I Limited (**DP Aircraft**) is used, stored, transferred or otherwise processed, and other matters relating to it. This may relate to you if you are an individual or to your individual representatives if you are a body corporate. This notice also contains information about rights in relation to personal data.

2. RESPONSIBILITY FOR PERSONAL DATA

This privacy notice is provided on behalf of: DP Aircraft and each of its respective group companies (together the **DP Aircraft Entities**).

Where we use the terms **we**, **us** and **our** in this privacy notice, we are referring to DP Aircraft and the DP Aircraft Entities.

When personal data is provided to us, DP Aircraft and certain DP Aircraft Entities will, in relation to some or all of the personal data, be acting as a "data controller". The data controller determines how the personal data is used and for what purposes. If you would like to know which DP Aircraft Entities handle your personal data as a data controller, please contact us as the details given in section 14 below.

3. THE DATA WE COLLECT

The types of personal data we collect and share depends on the type of investor and investment being made. The types of personal information which we collect and process include some or all of the following:

- (a) **Information you provide to us** ► name, address and other contact information, your date of birth, place of birth, passport details or other national identifier, national insurance or social security number, employment details and information about your family.
- (b) **Information regarding bank account details** ► including assets, income, employment, source of funds, investment history and risk tolerance.
- (c) **Anti-Fraud information** ► information relating to your financial situation, your creditworthiness or any criminal or fraudulent activities provided to us by you or third parties including information which establishes your identity, such as driving licences, passports and utility bills and details of politically exposed person and sanctions lists where your details are included.
- (d) **Our correspondence** ► if you contact us, we will typically keep a record of that correspondence.
- (e) **Marketing preference information** ► details of your marketing preferences (e.g. communication preferences) and information relevant to selecting appropriate products and services to offer you.
- (f) **Website and communication usage** ► details of your visits to the websites and information collected through cookies and other tracking technologies including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources that you access.

In order to provide our services to you we collect information about you from a number of sources, including from you directly. Information that you give us is received from the subscription document, tax forms and other associated documentation that you complete when subscribing for shares in DP Aircraft and when you provide it in correspondence and discussions with us. Other sources from which we receive data include tax authorities, government and competent regulatory authorities to whom we have regulatory obligations, publicly available directories and sources, background check providers and credit, fraud and detection agencies and bankruptcy registers.

There are also "special categories" of personal data which require a higher level of protection (**Special Category Data**). We may also collect, store and use Information relating to criminal convictions.

4. HOW AND ON WHICH BASIS WE USE YOUR PERSONAL DATA

We require personal information for a number of reasons, including:

(a) For compliance with applicable legal or regulatory obligations to:

- Verify the identity and addresses of our investors and prospective investors and, if applicable, their beneficial owners and individual representatives.
- Undertake our due diligence and on-boarding checks.
- Carry out verification, know your customer, terrorist financing and anti-money-laundering checks and to ensure compliance with sanctions.
- Comply with requests from regulatory, governmental, tax and law enforcement authorities, including, without limitation, with respect to compliance with the US Foreign Account Tax Compliance Act ("FATCA") and the OECD common reporting standard ("CRS") or any legislation, regulations or guidance enacted in any jurisdiction that seeks to implement a similar tax reporting or withholding tax regime.
- Undertake investigation, surveillance and audit checks and to prevent and detect fraud. If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services you have requested. A record of fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in other refusing to provide services, financial or employment to you.
- Maintain statutory registers.

(b) In order to perform our contract with you so that we can:

- Establish, administer and manage your shareholding.
- Meet our contractual obligations.
- Facilitate the relationship between you and DP Aircraft.

(c) For our legitimate interests or for those of a third party to deploy our services, communicate with you and defend our legal rights, in particular to enable us to:

- Administer and manage your shareholding in DP Aircraft including corresponding with you in connection with your investment.

- Review, analyse and process any requests or applications made by you or on your behalf.
- Address or investigate any complaints, claims, proceedings or disputes and to seek professional advice, including legal advice.
- Provide you with and inform you about our products and services.
- Meeting our obligations and requirements including regulatory, accounting, tax reporting and audit.
- Ensure appropriate management and governance, management of risk and operations (including protecting our business against fraud and other risks) and to maintain our internal records and act in accordance with our policies and procedures.

In limited circumstances, DP Aircraft Entities may approach the relevant individual for written consent to allow us to process certain particularly sensitive data, known as special category data. If we do so, we will provide the individual with full details of the information that we would like and the reason we need it, so that the individual can carefully consider whether to give consent.

5. CONSEQUENCES OF NOT PROVIDING PERSONAL DATA

We require personal information to be able to comply with our legal and regulatory obligations and to manage and administer your shareholding in DP Aircraft. Accordingly, if personal data required is not provided, a shareholder or prospective shareholder may not be able to invest in DP Aircraft and we may not be able to manage your shareholding.

6. DISCLOSURE TO THIRD PARTIES

In relation to personal data processed in connection with DP Aircraft Entities, your data may be transferred to the following list of affiliated entities in order that we can manage our relationship with you:

- (a) Administrators and depositories in connection with the management of your shareholding, the administration of investment related activities and to enable compliance with applicable laws and regulations.
- (b) Tax authorities to comply with applicable laws and regulations or where requested by such tax authority (including authorities outside of the European Economic Area (**EEA**)).
- (c) Service providers and our professional advisers to facilitate your shareholding, provide shareholder related services and to provide us with legal advice in relation to DP Aircraft Entities and your shareholding.

There may also be circumstances where DP Aircraft Entities (and fraud prevention agencies) are obliged by law to disclose personal data, including to law enforcement agencies and applicable regulators for crime detection and prevention purposes.

7. LOCATION OF PERSONAL DATA AND EXPORT OUTSIDE THE EEA

It may be necessary for DP Aircraft Entities or associated third parties to effect cross-border transfers of personal data, including to the United States of America and to countries outside the EEA. In some cases, personal data may be transferred to jurisdictions outside of Guernsey and the EEA that are not deemed to have data protection frameworks that are equivalent to those of the EEA or are not designated jurisdictions under Guernsey data protection legislation. Such transfers may be to other DP Aircraft Entities, to governmental, regulatory or judicial authorities, auditors, legal advisors or agents as well as to sub-contractors engaged by a DP Aircraft Entity. In these situations we will, all circumstances, safeguard personal information as set out in this privacy notice.

Where we transfer personal data from inside the EEA to outside the EEA, we will seek to put appropriate safeguards in place to maintain the security of your data. Certain countries outside the EEA have been approved by the European Commission as providing essentially equivalent protections to EEA data protection laws and therefore no additional safeguards are required to export personal information to these jurisdictions. In countries which have not had these approvals (see the full list here http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm), we will establish legal grounds justifying such transfer, such as EU Commission-approved model contractual clauses, or other legal grounds permitted by applicable legal requirements.

Please contact us, at the details set out below, if you would like to know more about these arrangements or if you would like to see a copy of the specific safeguards applied to the export of your personal information.

8. RETENTION OF YOUR DATA

DP Aircraft Entities and those third parties to whom personal data is transferred will retain that data as long as is necessary for the purposes set out above, and any other permissible, related purpose. In particular, DP Aircraft Entities will hold certain personal data and other information regarding its shareholders for at least as long as they remain shareholders in DP Aircraft. The retention period may extend beyond this term where necessary for DP Aircraft's legitimate interests, including to comply with legal or regulatory obligations or to facilitate DP Aircraft's on-going administration and performance. Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six year.

9. INDIVIDUAL RIGHTS

Individuals whose personal data is processed by us have certain legal rights in respect of the information. These include:

- The right to request access to personal data.
- The right to obtain information about the use of personal data.
- The right to require rectification (correction) of errors in personal data without undue delay.
- The right to have personal data erased without undue delay in certain circumstances.
- The right to restrict the processing of personal data in certain situations.
- The right to receive personal data in a structured, commonly used and machine-readable format and transmit that data to a third party.
- The right to data portability.
- The right to object to the processing of personal data in certain situations.
- The right to be notified of rectification, erasure and restrictions.
- The right to lodge a complaint and the right to judicial review in certain situations.

You may exercise these rights by contacting us at the contact details in section 14 below.

If an individual wishes to exercise any of these rights and a DP Aircraft Entity has transferred that person's data to a third party, that DP Aircraft Entity will communicate that request to the relevant third party unless it would be impossible or involve disproportionate effort for that DP Aircraft Entity to do so.

Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege). If you exercise any of these rights we will check your entitlement and respond in most cases within a month.

10. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where the individual may have provided their consent to the collection, processing and transfer of personal information for a specific purpose, the individual has the right to withdraw consent for that specific processing at any time.

To withdraw consent, please contact the Company Secretary, Aztec Financial Services (Guernsey) Limited. Once we have received notification that the individual has withdrawn consent, we will no longer process information for the purpose or purposes that the individual originally agreed to, unless we have another legitimate basis for doing so in law.

11. MARKETING

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by not checking certain boxes on the forms we use to collect your personal data. You can also exercise the right at any time by contacting us as set out in the "Concerns or queries" section below.

12. UPDATES

This notice is under regular review and may be updated periodically and without prior notice to reflect changes in DP Aircraft's personal information practices.

We will use reasonable endeavours to ensure that your personal data is accurate. In order to assist us with this, you should notify us of any changes to the personal data that you have provided to us by contacting us as set out in the "Concerns or queries" section below.

13. COOKIES POLICY

We use cookies on our websites. To find out more about how we use cookies, please see our website at www.dpaircraft.com.

14. CONCERNS OR QUERIES

Any questions about the contents of this notice or use of personal data should be addressed to, the Company Secretary via email at dpa@aztecgroup.co.uk or post at PO Box 656, East wing, Trafalgar Court, Les Banques, St Peter Port, Guernsey, GY1 3PP. Issues or concerns individuals have regarding their personal data can also be brought to the attention of the applicable supervisory authority in your country, where you live or work, or the location where the data protection issue arose. The details of the supervisory authority in the UK and Guernsey are set out below.

The UK:

The Information Commissioner's Office

Water Lane
Wycliffe House
Wilmslow
Cheshire
SK9 5AF
Email: international.team@ico.org.uk

Tel. +44 1625 545 745

Guernsey:

The Office of the Data Protection Commissioner

Guernsey Information Centre

North Esplanade

St Peter Port

Guernsey, GY1 2LQ

Email: enquiries@dataci.org

Telephone: +44 (0) 1481 742074