

SUMMARY OF PRIVACY POLICY

This summary Privacy Policy ("**Summary Policy**") will provide you with a summary of the accompanied and detailed Privacy Policy (hereafter "**Full Policy**", together "**Summary and Full Policy**"). **Henley & Partners Group Holdings Ltd** ("**H&P**" or "**we**", "**us**", "**our**") (Company registration C58006) and whose registered address is at Pendergardens Business Tower, Level 2, Saint Andrews Road, Paceville, Saint Julian's, Malta STJ 9023 is the Data Controller that is responsible for the data processing activities with respect to individually identifiable information ("**Personal Data**") about users of our website <https://thepresidentslinks.com.na/> (the "**Website**") in order to participate in application for the residence by investment program ("**Program**").

Scope of applicability

This Summary and Full Policy applies to you if you are a user of our Website and/or a (future) applicant of our Program.

Processing of your Personal Data (categories of Personal Data)

We process the following Personal Data of users which is collected during your start of new application for the Program through our online portal: Your full name, salutation, nationality, gender, date of birth, email address, a copy of your passport page (including biometric data), passport number, passport issuing authority (including issue and expiry date), occupation details, business, current and permanent address, passport photo, a copy of any current visa (if applicable), birth or marriage certificate (if applicable), and any other information necessary for your Application and any other information relating to any individuals, who you are applying for the Program on their behalf, which you have provided us or you may have submitted to us, online or via other forms of interaction with you. For more details see 1. "Categories of Personal Data" of the Full Policy.

Processing purposes

We process your Personal Data for the following purposes: registering your application through our online portal and maintaining your account, administering your online application, security and fraud prevention, conducting market research and/or analysis for statistical (this is no longer personal data, but aggregate data), profiling or other purposes for us to review, develop and improve the quality of our products and service. For more details see 2. "Processing purposes" of the Full Policy.

Legal justifications for the processing of your Personal Data

One of the key privacy law requirements is that any processing of Personal Data has to have a legal justification. We generally use the following legal justifications: The processing is necessary for (i) the performance of a contract to participate in the Program (Art. 6(1)(b) GDPR; "**Contract Justification**"), (ii) compliance with a legal obligation (Art. 6(1)(c) GDPR; "**Legal Obligation Justification**"), or (iii) realizing a legitimate interest (Art. 6(1)(f) GDPR; "**Legitimate Interest Justification**"). For more details and the matching of purposes and corresponding legal justifications see 3. "Legal justification for processing of your Personal Data" of the Full Policy.

Data transfers and recipients and legal justification for such transfers

We transfer your Personal Data to other H&P entities (mainly the office in Namibia), the Ministry of Home Affairs and Immigration of the Republic of Namibia, the investment provider PRESIDENT'S LINKS

ESTATE (PTY) LTD and in accordance with applicable law, other governmental authorities, courts, external advisors, and similar third parties, some of the aforementioned recipients located in jurisdictions outside the EU. For more details see 4. “Data transfers and recipients and legal justification for such transfers” of the Full Policy.

Retention periods for and deletion of your Personal Data

Your Personal Data will be deleted once it is no longer needed for the purposes of which they were originally collected or as required by applicable law. For more details see 5. “Retention periods for and deletion of your Personal Data” of the Full Policy.

Your statutory rights

You have a number of rights granted by applicable laws with regard to the processing of your Personal Data, such as the right to have access to your data, to have them corrected, erased or handed over to you. Please refer any of your questions to our Data Protection Officer at: dpo@henleyglobal.com. For more details see 6. “Your statutory rights” of the Full Policy.

Changes of this Summary and Full Policy as well as further notices

Please note that our Services are under constant development. This Privacy Policy may therefore be modified and updated on an ongoing basis. Please check back to this page regularly.

How to contact Us

If you wish to exercise your data subject rights or if you have any other questions concerning this Summary and/or Full Policy, please address your request to our Data Protection Officer who can be contacted at:

Henley & Partners Group Holdings Ltd
Group Data Protection Officer
Pendergardens Business Tower, Level 2
Saint Andrews Road, Paceville
St. Julian's, STJ 9023
Malta
Email: dpo@henleyglobal.com

FULL POLICY

1. Categories of Personal Data

We collect Personal Data about you via our Website through the online portal.

1.1 When you apply for the Program via our online Website portal or our representatives/staff (in case of sending documentation via e-mail during enquiry).

We process the following Personal Data about you: full name, salutation, nationality, gender, date of birth, email address, a copy of your passport (including biometric data), passport number, passport issuing authority (including issue and expiry date), company name, business, current and permanent

address, occupation details, job title, passport photo, and in some instances Sensitive Data (as defined below) (collectively referred to as “**Application Personal Data**”).

The Application Personal Data categories that we process consist of normal Personal Data about you and certain special categories of Personal Data about you, for example, data that reveals your biometric data (including photographs) or data concerning your health (collectively referred to as "**Sensitive Data**"), if you provide this information as part of the Application:

- **Fingerprints;**
- **Medical Certification;**
- **Radiology Report**
- **Police Clearance Report.**

1.2 Generally, we collect your Personal Data in the following ways:

- (i) when you register an account or submit a Application form;
- (ii) when you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use our Website;
- (iii) when you interact with our customer service representatives, for example, via telephone calls and emails;
- (iv) when you use our electronic services, or interact with us via our Website;
- (v) when you request that we contact you or request that you be included in an email or other mailing list;
- (vi) when you respond to any request with additional Personal Data;
- (vii) when you are contacted by, and respond to, our customer service officers;
- (viii) when we receive references from business partners, relevant government agencies and third parties, for example, where you have been referred by them;
- (ix) when you fill up surveys administered by our third party surveying service providers;
- (x) when we seek information from third parties about you in connection with the services you have applied for; and/or
- (xi) when you submit your Personal Data to us for any other reason.

2. Processing purposes

We process your Personal Data to the extent permitted or required under applicable law, for the following purposes in each of the two steps:

2.1 When you provide your details on our Website

(i) Providing your contact details for the purposes of the complimentary assisted application service, (ii) Providing your contact details for the purposes of the complimentary enquiry or call back (iii) responding to your queries, feedback, complaints and requests, and (iv) managing your account or application on our Website,

2.2 When you apply through the application via our online portal on our Website

- Processing your online application for the purposes of sending the application to the Ministry of Home Affairs and Immigration of the Republic of Namibia and available to the investment provider PRESIDENT'S LINKS ESTATE (PTY) LTD; and
- (i) Requesting feedback or participation in surveys, (ii) conducting market research and/or analysis for statistical (this is no longer personal data, but aggregate data), profiling or other purposes for us to review, develop and improve the quality of our products and services, and (iii) testing and improving our systems, and preventing the misuse or improper use of our services ("**Quality Enhancement Purposes**").

3. Legal justification for the processing of your Personal Data

In general, you are required to provide your Personal Data, except in limited instances when we indicate that certain information is voluntary or optional and their processing is based on your consent (e.g. in connection with user satisfaction surveys following submission of your application). However, if you do not provide your Personal Data that is mandatory for the Application then your application will be marked as incomplete and we will be unable to submit it to the Ministry of Home Affairs and Immigration of the Republic of Namibia.

Furthermore, we rely on the following legal justifications for the processing of your Personal Data:

Processing Purposes	Categories of Personal Data Involved	Legal Basis
Application Purposes	Application Personal Data, Sensitive Data	Contract Justification
Quality Enhancement Purposes	Application Personal Data	Legitimate Interest Justification

4. Data transfers and recipients and legal justification for such transfers

4.1 Recipients

(i) **Other group companies:** We transfer your Personal Data to other H&P group companies, as permitted under applicable data protection laws pursuant to Legitimate Interest Obligation for the legitimate

interests of H&P to facilitate your application Program. These recipients are most likely our offices in Malta, United Arab Emirates, and South Africa. More offices may be involved case-by-case on a need-to-know basis and in accordance with applicable data protection laws, including the EU General Data Protection Regulation 2016/679 (the “GDPR”).

(ii) **Third parties:** We may transfer your Personal Data to governmental agencies and regulators, courts and government authorities, all in accordance with applicable data protection laws (including GDPR) based on Legal Obligation Justification and to external advisors acting as controllers (e.g. lawyers, accountants, auditors etc.) based on Legitimate Interest Obligation.

(iii) **Service providers:** We contract with third party (cloud service) service providers as part of our normal business operations to carry out your application process. Note, no financial information is stored by us, only transaction logs.

(iv) A list of data recipients containing the identity, short description of the processing activity and location of the relevant data recipients can be requested from us under the contact details further below.

4.2 Cross-Border Data Transfers

(i) We may transfer your Personal Data outside of the country you are located. Some recipients of your Personal Data are located in another country for which the European Commission has not issued a decision that this country ensures an adequate level of data protection, namely: Namibia, Malta, South Africa, United Arab Emirates.

(ii) By way of entering into appropriate data transfer agreements based on Standard Contractual Clauses (2010/87/EU and/or 2004/915/EC) as referred to in Article 46(5) of the GDPR or other adequate means, you are able to obtain a copy by contacting our Data Protection Officer at dpo@henleyglobal.com. We have established that all recipients located outside the EEA will provide an adequate level of data protection for your Personal Data and that appropriate technical and organizational security measures are in place to protect your Personal Data against accidental or unlawful destruction, accidental loss or alteration, unauthorized disclosure or access, and against all other unlawful forms of processing. Any onward transfer is subject to appropriate onward transfer requirements as required by applicable data protection laws (including the GDPR).

5. Retention periods for and deletion of your Personal Data

5.1 Your Personal Data processed for the purposes hereunder will be stored only to the extent necessary during the term of your participation in the Program, during a transition period (e.g. for the compliance of our obligations regarding data retention as established under applicable laws). If a judicial or disciplinary action is initiated, your Personal Data may be stored until the end of such action, including any potential periods for appeal, and will then be deleted or archived as permitted by applicable laws.

5.2 In principle we will retain your Personal Data as long as required or permitted by applicable laws – 10 years. Afterwards, we will remove or delete your Personal Data from our systems and records and/or take steps to properly anonymize it so that you can no longer be identified from it.

6. Your statutory rights

Under the conditions set out under applicable law (i.e. the GDPR), you have the following rights:

6.1 Right of access: You have the right to obtain from us confirmation as to whether or not Personal Data concerning you is being processed, and, where that is the case, to request access to the Personal Data. The access information includes – inter alia – the purposes of the processing, the categories of Personal Data concerned, and the recipients or categories of recipients to whom the Personal Data have been or will be disclosed. You have the right to obtain a copy of the Personal Data undergoing processing. For additional copies requested by you, we may charge a reasonable fee based on administrative costs.

6.2 Right to rectification: You have the right to obtain from us the rectification of inaccurate Personal Data concerning you. Depending on the purposes of the processing, you have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.

6.3 Right to erasure (right to be forgotten): You have the right to ask us to erase your Personal Data.

6.4 Right to restriction of processing: You have the right to request the restriction of processing your Personal Data. In this case, the respective data will be marked and may only be processed by us for certain purposes.

6.5 Right to data portability: You have the right to receive the Personal Data concerning you which you have provided to us in a structured, commonly used and machine-readable format and you have the right to transmit those Personal Data to another entity (or Controller) without hindrance from us.

6.6 Right to object: You have the right to object or withdraw your consent at any time to the processing of your Personal Data by us and we can be required to no longer process your Personal Data. If you have a right to object and you exercise this right, your Personal Data will no longer be processed for such purposes by us. Exercising this right will not incur any costs. Such a right to object may not exist, in particular, if the processing of your Personal Data is necessary to take steps prior to entering into a contract or to perform a contract already concluded.

Please note that any such withdrawal shall not affect the lawfulness of any processing carried out prior to you notifying us that you are objecting or withdrawing your consent. Please note should you object or withdraw your consent to us processing all or some of your Personal Data and which is required for the application, then we may be unable to submit your incomplete application.

Please note that the aforementioned rights might be limited under the applicable data protection laws, however, we remain committed to universally providing users and applicants these fundamental EU data protection rights and freedoms (including the GDPR) irrespective of your geographical location.

Please refer any of your questions to our Data Protection Officer at dpo@henleyglobal.com.

In case of complaints you also have the right to lodge a complaint with the competent supervisory authority, in particular in the member state of your habitual residence or alleged infringement of the GDPR.