

HCB Ltd. Privacy Notice

Our primary commitment to you

The policy of **HCB Ltd.** (“HCB” and/or “The Company”) is to respect and protect the privacy of individuals on whom we process data during the course of our business, including data relating to, clients, Investors, vendors and related parties.

To fulfil this policy, HCB agrees to exercise the safeguards and precautions set out in this written notice (the “Privacy Notice”) to maintain the confidentiality of information we process and the data that we control. Our office in Bermuda can be found at Cedar House, 3rd Floor, 41 Cedar Avenue, Hamilton, HM 12 Bermuda.

Contact Details of the Privacy Officer,

Name: Rhonda Padgett

Email address: rpadgett@highland.com

Postal address:

3535 Grandview Parkway, Suite 500

Birmingham, AL 35243

Telephone number: 205.263.9213

Please direct any concerns regarding your data privacy to Rhonda Padgett and a member of our data privacy team will respond.

HCB is subject to varying requirements of data protection legislation where we operate. Our aim is to be as consistent as possible, to obey all applicable laws, and apply the highest standard of privacy principles to our approach.

This Privacy Notice sets forth HCB’s current policies and practices with respect to:

- What personal information we may hold or collect;
- How we may use your personal information;
- Who we may disclose your personal information to;
- Contacting us and your rights to access and update your personal information; and
- How changes to this Privacy Notice will be made.

What personal information we may hold or collect

We may process the following data categories depending on the business relationship with you: Information including your name, Date of Birth, Residential address and contact details;

- Details of your visits to HCB website, online portals 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, web logs and other communication data.

Sensitive or Special Category data may include:

- Information relating to any criminal or fraudulent activities provided to us by you;
- Information used in Financial Crime prevention or sanctions checking against public lists.

We collect this information from the following sources:

- Information from you supplied during the onboarding process; and
- From public sources.

How we use your personal information

We will only use your personal information for the purposes we tell you, and always on a lawful basis.

Most commonly, we will use your personal information in the following circumstances:

- Where we need to fulfill the contract that we are about to enter into or have entered into with you to provide products and services;
- Where there is a reasonable expectation on our part that you would not request us not to begin or to cease our use of your personal information;
- Where we need to comply with a legal or regulatory obligation.

Why we process your data

We process your personal data for the following purposes:

- Policy Management
- Providing payments
- Compliance with applicable laws and regulations as well as security, and compliance with corporate financial responsibilities
- When you visit our website, we may collect cookie information and information gathered from your browser such as IP address and location (see Cookie Policy)
- When we need to contact you for the purposes of administering our service to you
- For Financial Crime prevention, Know Your Client, and Anti Money Laundering and Anti-Terrorist Financing purposes

With whom will the personal information be shared?

We may share your personal data with third parties who are primarily business partners, Banks and other parties involved in the business relationship. In addition, we are sometimes required to share data with other entities to comply with a law or regulation. This could include regulatory authorities, courts, external auditors.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

We will not share your personal information outside of Bermuda. If there is a requirement to transfer your personal information outside of Bermuda, we take steps (either through contractual or operational means) to ensure your information receives the same or a better level of protection we deploy to maintain the security and confidentiality of your personal information.

How long will the personal information be retained?

We only retain data for as long as necessary to process your data. Our retention policy varies depending on the categories of information we collect and according to applicable law. Due to the nature of our business generally, we hold information for five years, but this could be longer depending on our obligations to you or whether we have an ongoing legal dispute with you.

In some circumstances you can ask us to delete your information: please contact the Privacy Officer for further information on your rights regarding information erasure.

Information Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal information to those employees.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Your Legal Rights

Under certain circumstances, you have rights under Bermuda's privacy laws in relation to your personal information. These rights are as follows, with further detail provided in the Glossary below:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected, though we may need to verify the accuracy of the new information you provide to us.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us to continue to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we

may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Request restriction of processing** of your personal information. This enables you to ask us to suspend the processing of your personal information for the purposes of advertising, marketing or public relations, or where the use of the personal information is causing or is likely to cause substantial damage or distress to the individual or another individual.
- **Withdraw consent at any time** where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact the Privacy Officer by email at rpadgett@highland.com

We may need to request specific information from you to help us confirm your identity and ensure you have your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to assist our response.

Making a Compliant

If you have a complaint about HCB's use of your personal information, please let us know by contacting our Privacy Officer in writing at the mailing address or email provided in this Notice.

Time Limit to Respond

We will try to respond to all legitimate requests within 45 days. Occasionally it may take us longer if your request is particularly complex or you have made several requests. In this case, we will notify you that we will extend the response time by up to an additional 30 days, and keep you updated.

Changes to the Privacy Notice and your duty to inform us of changes

HCB reserves the right to make changes to this Privacy Notice without notice to you. Any changes made will become effective when the revised Privacy Notice is published on the HCB website.

It is important that the personal information we hold about you is accurate and up to date. Please keep us informed if your personal information changes during your relationship with us.