



Citco Group of Companies Technical and Organisational Measures

July 2022

CITCO

Overview of the Technical and Organisational Measures applied by Citco when processing Personal Data

The **Citco Group Limited and its subsidiaries and affiliates** (together **Citco, we, us or our**) recognize the importance of protecting your privacy.

This notice describes the technical and organisational measures applied by Citco when we collect, hold, and process personal information that you provide or is provided on your behalf or collected by us. If you would like more detail on any of the information in this notice, please see our website’s Q&A resources at www.citco.com/footer/privacy. For a list of the Citco affiliates and their contact details, please visit: <https://www.citco.com/global-reach>.

1. Security and Storage

Security

We implement and maintain physical, electronic and procedural safeguards and security measures designed to protect personal information from misuse, interference and loss, and from unauthorized access, modification or disclosure.

<p>a) encryption of personal data</p>	<p>Citco has implemented encryption: “data in transit” and “data at rest” (Citco holds the keys). The extent and nature of encryption which Citco implements is kept under review taking into account the state of the art, the cost of implementation and the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for rights and freedoms of natural persons posed by the processing.</p>
<p>b) the ability to ensure the ongoing confidentiality, integrity, availability, and resilience of processing systems and services</p>	<p>Please refer to controls below. Citco has also obtained an ISO 27001:2013 certification of our Information Security Management System (“ISMS” aka Security Program) in December 2016. The 27001:2013 is an industry standard framework for securing an ISMS. It is comprised of a suite of activities (14 domains) relating to the identification and management of information risks. An ISMS is a systematic approach to managing sensitive information so that it remains secure. It includes people, processes and IT systems by applying a risk management process.</p> <p>The certification applies Citco group-wide and covers all Citco computer systems/IT operations - used by all entities within Citco. Citco’s offices with significant IT presence/operations are in scope of the certification as certain aspects of the certification are specific to where these operations take place. We can supply you with a copy of our certificate upon request.</p> <p>We perform security awareness and data privacy essentials training when staff is on-boarded and yearly thereafter.</p> <p>We deployed a Privacy and Security portal containing policies, standards, procedures, definitions, and other various resources an employee can reference for privacy and security related matters.</p>

c) ensuring processes exist to ensure access controls are 'least privilege'	Information Systems Security Officer performs monthly review of users' access to Citco production applications; Dept. Heads / Dept. SMEs perform user access recertification review yearly.
d) the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident	Our systems are clustered (high availability). We also maintain a separate facility in the event the facility goes off-line. Complete failover tested yearly.
e) a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing	<p>We regularly test a number of controls for effectiveness and security of processing:</p> <ol style="list-style-type: none"> 1) Tests are conducted by the Business – (1st line of defence) 2) Results are overseen by Risk Management – (2nd line of defence) 3) Risk framework is audited by (Internal Group Audit – (3rd line of defence) <p>In addition, we have dedicated security staff who test all systems for vulnerabilities. All systems tested after each patch cycle; after any significant changes; and prior to new systems going into production. Citco also has an independent 3rd party conducting tests on an annual basis of our DMZ environment.</p>
f) technical controls	<p>Citco has implemented and maintains physical, electronic and procedural safeguards and security measures designed to protect personal information. For example:</p> <ul style="list-style-type: none"> • Encryption – both at rest and in transit; • Citco operates under the principles of Least-privilege and Segregation of Duties; • Multi-factor authentication to access external-facing web applications; • Advanced Persistent Threat Infrastructure - IPs sensors at every point of ingress and egress as well as EPP and EDP deployed to all Windows endpoints; • Next-gen firewalls and Intrusion Detection Systems (IDS) in all offices and Data Centers; • Privileged Access Control; • Threat Intelligence Services; • System Protection including centralized next-gen anti-virus/anti-spam systems, heuristic detection, etc.; • E-mail Gateways with additional anti-spam control and data egress/ingress detection; • Data loss prevention measures to control USB ports and CD / DVD drives; • Integrated phishing reporting mechanisms; • URL filtering to control internet access; • Security part of Lifecycle development process;

- Code reviews and penetration tests conducted during development and prior to production release;
- Baseline security established for systems and periodically measured for compliance;
- Information Rights Management with persistent, on/off network protection for sensitive, proprietary unstructured data files;
- 3rd party Data Centers professionally managed and maintained;
- Badge reader or biometric authentication required to access offices or computer rooms.

Storage

We store business and client data within our secure corporate datacenters or authorized secure cloud providers.

- Cloud providers do not have access to our encryption keys and cannot access Citco Data;
- Passwords are securely stored in our authentication repository and not accessible to any Citco personnel; and
- Access to customer information is strictly controlled via role-based access controls and multi-factor authentication.

2. Questions or Complaints

Our Chief Privacy Officer oversees how we collect, hold, use and disclose personal information and protect your personal information to ensure your rights are fulfilled. For questions about this notice, to exercise your rights regarding your personal information held by us, or to make an enquiry, please contact our Data Protection Officer or privacy team:

c/o Citco Technology Management (Ireland) Limited
Custom House Plaza, Block 5, IFSC Dublin 1, Ireland

Privacy Team Email: Privacy@citco.com

Data Protection Officer Email: dpo@citco.com

Phone #: Toll Free: +1 800 457 2251 / Americas: +1 201 793 5858 / Europe: +41 22 591 1212

You may make a complaint about an alleged breach by us of applicable privacy laws in relation to our handling of your personal information. Your complaint should be in writing and addressed to our Data Protection Officer. Alternatively, you have a right to lodge a complaint with the competent supervisory authority.

3. Notice of Changes

We keep this notice under regular review and may modify or amend it from time to time at our discretion. If we make changes, we will record the date of amendment or modification at the top of the notice. The revised notice will apply to you and your information from that date. We would encourage you to review this notice periodically.

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