

Cayman Island Data Protection and EU Privacy Policy

This privacy notice describes how Ancora Advisors LLC, Ancora Family Wealth Advisors, Inc., Ancora Retirement Plan Advisors, Inc. & Inverness Securities LLC (collectively "Ancora") collects and processes Personal Data in accordance with the EU data protection regime introduced by the General Data Protection Regulation 2016/679 ("GDPR") and the Cayman Islands Data Protection Law 2017 ("DPL") (GDPR and DPL together "Data Protection Laws").

Personal Data is information, or a combination of pieces of information that could reasonably allow an individual to be identified. Detailed below Ancora describes how we use and protect your Personal Data, and individuals' rights in relation to this information. It applies to all Personal Data Ancora collects about the individual.

1) Personal Data Ancora collects

- a) Ancora will collect and process certain Personal Data about the following individuals associated with the Client (referred to as "Related Parties"):
 - › Individual directors, company secretaries or other equivalent individual office holders and beneficial owners of the Client
 - › Guarantors and third-party security providers
 - › Legal representatives and other individuals authorized to act on behalf of the Client
 - › Individuals associated with the directors and beneficial owners of the Client's business
 - › Any employees, contractors, representatives, officers or agents of the Client
 - › All authorized users of eMoney service
- b) Ancora collects Personal Data directly from the Client and Related Parties and also from other sources described below:
 - › Ancora will check its own records for information about (i) any accounts belonging to the Client or any associated businesses and (ii) the Client's shareholders who are beneficial owners of the businesses
 - › Ancora may carry out searches using financial crime prevention agencies for information relating to the Client's business and Related Parties
 - › Ancora may search publically available sources, such as media stories, for information relating to the Client's business and Related Parties
- c) The categories of information that Ancora collects about the Client and Related Parties include:
 - › Personal details (e.g. name, date of birth, identification information, information about personal interests)
 - › Contact details (e.g. phone number, email address, postal address or mobile number)
 - › Client-related details (e.g. relationship with the Client or Related Parties, business information, information about any shareholdings, business contact details)
 - › Transactional details (e.g. information about services, requests, queries or complaints)
 - › Financial details (e.g. information about business accounts, financial history, information from fraud prevention agencies)
 - › Professional details (e.g. role and position within the Client, specialist business skills and expertise)
- d) Some of the information that Ancora collects are special categories of Personal Data (also known as sensitive Personal Data). For example, the Client due diligence checks Ancora carries out may reveal

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political opinions or information about criminal convictions or offences about Clients and Related Parties.

- e) In addition, if incorrect information is provided or fraud is suspected, Ancora will record this. Ancora may also pass this information to financial crime prevention agencies where it may be accessed by law enforcement agencies globally. Where Ancora processes such sensitive Personal Data, it will usually do so on the basis that it is necessary for reasons of substantial public interest or to establish, exercise or defend any legal claims. In any case, Ancora will carry out the processing in accordance with applicable laws.
- f) Ancora may be required by law to collect certain Personal Data, or as a consequence of its contractual relationship with its Clients. Failure to provide this information may prevent or delay the fulfilment of these obligations.

2) What Ancora uses Personal Data for and for what legal basis

- a) Ancora must have a legal basis to process Client and Related Parties' Personal Data. The table below sets out the purposes for which Ancora uses Personal Data about Clients and Related Parties, and its legal basis for doing so. Where Ancora is relying on a legitimate interest, these are also set out below:

What Ancora uses your information for	The legal basis for doing so
Client administration and management, including relationship management, and for account administration and management purposes	<ul style="list-style-type: none"> › Where the law requires this › Where it is in Ancora legitimate interests to ensure that its Client accounts are well-managed, so that its Clients are provided with a high standard of service, to protect its business interests and the interests of its Clients
Transaction processing, registering of trades, monitoring and analysis activities to develop and manage our products and services	<ul style="list-style-type: none"> › Where the law requires › Where it is in Ancora legitimate interests to develop, build, implement and run business models and systems which protect its business interests and provide its Clients with a high standard of service
Undertaking Client due diligence checks for the prevention and detection of financial and other crimes and undertaking checks, including on Related Parties, in relation to identity verification, application checks, anti-money laundering, compliance and risk screening	<ul style="list-style-type: none"> › Where the law requires this › Where it is in Ancora legitimate interests to prevent and investigate fraud, money laundering and other crimes and to verify the Client's identity in order to protect its business and to comply with laws that apply to it
Communicating with the Client and Related Parties from time to time about products, services, events offered by Ancora and other communications such as research and insights, that may be of interest to the Client and Related Parties	<ul style="list-style-type: none"> › Where it is in Ancora legitimate interests to provide information about its business and services that it believes would benefit or inform its Clients
Complying with legal obligations to which it is subject and cooperating with regulators and law enforcement bodies	<ul style="list-style-type: none"> › Where the law requires this

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<p>Exercising its legal rights where it is necessary to do so, for example to detect, prevent and respond to fraud or other violations of law, for legal and dispute management purposes, and for debt collection and recoveries purposes</p>	<ul style="list-style-type: none"> › Where the law requires this › Where it is in Ancora legitimate interests to prevent and investigate fraud, money laundering and other crimes and to verify the Client's identity in order to protect its business and to comply with laws that apply to it
<p>Providing services requested by the Client (such as eMoney), for user authentication, management and administration of services and monitoring and reporting to develop and improve our services</p>	<ul style="list-style-type: none"> › Where it is in Ancora legitimate interests to ensure that its services are well-managed, so that its Clients are provided with a high standard of service, to protect its business interests and the interests of its Clients

- b) Recipients of any marketing communications may tell Ancora at any time if they wish to change their contact preferences for this purpose.
- c) When Ancora processes Client and Related Parties' Personal Data to meet its legitimate interests, it puts in place robust safeguards to ensure that the Client and Related Parties privacy is protected and to ensure that its legitimate interests do not override the Client and Related Parties' interests or fundamental rights and freedoms.
- d) Ancora may contact the Client's guarantors and security providers in connection with any products and services provided to the Client by Ancora.
- e) Where Ancora processes any information about Clients and Related Parties that is not Personal Data, Ancora will comply with its obligations of confidentiality and establish and maintain adequate security measures to safeguard confidential information from unauthorized access or use.

3) Individuals' rights over their Personal Data

- a) Individuals have certain rights regarding their Personal Data, subject to local law. These include the following rights to:
 - › Access their Personal Data
 - › Rectify the information Ancora holds about them
 - › Erase their Personal Data
 - › Restrict the use of this Personal Data
 - › Object to the use of this Personal Data
 - › Lodge a complaint with the local data protection authority
 - › Be informed about how and who processes your data
 - › Be informed about rights related to automated decision making and profiling
 - › Be compensation for damage because of a breach of data protection
 - › Data portability in an interoperable formats that enable portability to another controller

Please refer to the Contact Us section (Section 8) below for further details on how to exercise these rights.

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4) Information sharing

- a) Where necessary Ancora may provide Personal Data about the Client and Related Parties:
 - › To its third parties. Where Ancora engages with a third party to process Client and Related Parties' information on its behalf, it will undertake due diligence, monitoring and assurance activities to ensure that the information is appropriately protected, and contractual clauses will be agreed between the parties to ensure that data protection and confidentiality is maintained
 - › To anyone as a result of any restructure, sale or acquisition of Ancora or to anyone to whom Ancora transfers or may transfer its rights
 - › If Ancora is required, requested or permitted to do so by law, regulation, court order, or supervisory, regulatory or similar authority
 - › For international payments where Ancora is required to send details of the payee and the beneficiary with the payment, and to overseas regulators and authorities in connection with their legitimate duties

Because Ancora may operate as part of a global business, the recipients referred to above may be located outside the jurisdiction in which you are located (or in which Ancora provides the services). See the section on "International transfer of Personal Data" below for more information.

5) International transfer of Personal Data

- a) Where Ancora' transfers the Client and Related Parties' Personal Data to other jurisdictions (in the operation of its business or for example to its third parties) it will ensure that appropriate safeguards are provided in order to ensure that the data transfers are subject to an adequate level of protection. These safeguards will include the use of contractual terms approved by the European data protection authorities.

6) Retention of Personal Data

- a) Ancora will retain Client Personal Data following closure of the Client's account(s) or following a transaction for a period of time, which will be calculated depending on the type of Personal Data, and the purposes for which it is held by Ancora. Ancora will only retain Client Personal Data to enable it to:
 - › Maintain business records for analysis and/or audit purposes
 - › Comply with record retention requirements under the law (for example, as required under legislation concerning the prevention, detection and investigation of money laundering and terrorist financing)
 - › Defend or bring any existing or potential legal claims
 - › Deal with any future complaints regarding the services Ancora has delivered
- b) The retention period is often linked to the amount of time available to bring a legal claim, Ancora will retain Client Personal Data after this time if it is required to do so to comply with the law, if there are outstanding claims or complaints that will reasonably require Client Personal Data to be retained, or for regulatory or technical reasons. Where Ancora retains this data it will continue to make sure that Related Parties' privacy is protected.

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7) Cookies

- a) Ancora may use cookies or similar technologies on its websites, mobile apps, and in its emails. Cookies are text files that hold small amounts of information, which an individual's computer or mobile device stores when they visit a website or use a mobile app. If Cookies are used you will be notified and the additional op-in and out information will be shown.
- b) Ancora uses header tags and similar technologies to run website traffic analysis.
- c) Ancora's website and mobile app terms and conditions provide further information on these technologies, how and where Ancora uses them, and how individuals can control them. This can be found on our website at: www.ancora.net

8) Contact us

- a) Subject access requests should be submitted to the Data Protection Officer.

The Ancora Data Protection Officer can be contacted by email at dpo@ancora.net or by mail at: The Data Protection Officer, Ancora, 6060 Parkland Boulevard, Suite 200, Cleveland, OH 44124. Please note that we cannot guarantee the security of your Personal Data while it's in transit to us. Therefore, if you choose to contact the Data Protection Officer by email, we advise that you keep Personal Data to a minimum, and in particular that you don't include full account information.

- b) For any other type of request, please contact your Ancora representative in the first instance. You may also refer to the Contact Us section of the website.
- c) Ancora is committed to working with individuals to obtain a fair resolution of any complaint or concern about privacy. If, however, individuals believe that Ancora has not been able to assist with their complaint or concern, they have the right to make a complaint to the data protection authority of the United Kingdom using their website - <https://ico.org.uk> or the Cayman Island Ombudsman at <https://ombudsman.ky/make-a-complaint>.

9) Changes to the Privacy Notice

- a) The information in this privacy notice is current at the time of the date below, but Ancora may modify or update this privacy notice from time to time. You can ask your Ancora representative for the latest copy of this privacy notice at any time.
- b) Where changes to this privacy notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on the Client or Related Parties, Ancora will give sufficient advance notice.

Last updated on September 30, 2019

Ancora Holdings Inc. is the parent company of three registered investment advisers with the United States Securities and Exchange Commission; Ancora Advisors, LLC, Ancora Family Wealth Advisors, LLC, Ancora Retirement Plan Advisors, Inc. In addition, it owns Inverness Securities, LLC, a FINRA & SIPC member broker dealer.