GDPR/Cayman Privacy Notice

About this privacy notice

This Privacy Notice explains how each fund described at the end of this notice (each, a "Fund") collects, uses, maintains and discloses personal data (defined below) in connection with your investment in the Fund.

The Fund is a data controller in respect of your personal data for the purposes of applicable data protection law, such as the European Union’s General Data Protection Regulation and the Data Protection Act (Revised) of the Cayman Islands, as amended from time to time and any regulations, codes of practice or orders promulgated pursuant thereto. The Fund is committed to and responsible for ensuring that it uses your personal data in compliance with data protection law.

Certain of the Fund’s providers, including TIG Advisors, LLC (the “Investment Manager”), the Fund’s administrator, registered office provider, any anti-money laundering officer service provider and their respective affiliates and delegates (the “Authorised Entities”) may collect, record, store, transfer and otherwise process personal data by which individuals may be directly or indirectly identified. Where such Authorised Entities are processing such personal data on behalf of the Fund, they shall generally process personal data provided to them in connection with an investment in the Fund, in accordance with the Fund’s instructions, and the Fund will generally act as the data controller of any such personal data.

For the purposes of this notice **we**, **us** or **our** means the Fund in its capacity as data controller of the personal data, and **you** or **your** shall mean you, the applicant or potential applicant. This privacy notice applies to you if (i) you are an applicant or potential applicant for shares in the Fund, (ii) your personal data has been provided to the Fund in connection with an application for shares in the Fund by another person connected to you which could include: any person owning or controlling the applicant, having a beneficial interest in the applicant, or being a beneficial owner under applicable legislation, any person for whom the applicant is acting as agent or nominee, any trustee, settlor or protector of a trust, and the directors, managers, members, officers and employees of all such persons or (iii) the Fund otherwise uses your personal data. This privacy notice sets out the basis on which personal data about you will be processed by the Fund. Please take the time to read and understand this privacy notice.

If you are a nominee investor or a corporate entity, this notice will be relevant for those individuals connected to you (as set out above) and you should transmit this document to such individuals for their awareness and consideration.

Personal data that the Fund might use

The Fund might process the following personal data about you:

(a) Information provided to the Fund by you or (if different) the applicant: This might include your name, title and residential or postal address (including proofs of name and address), contact details (telephone mobile number and email address), date of birth, age, gender, nationality, photograph, signature, copies of identity documents and national identification number, usernames, family structure, siblings, offspring, source of wealth, occupational history, job title, employer details, income, assets, other financial information, bank details and bank account numbers, personal data contained in emails, data regarding preferences in connection with marketing communications, investment history, tax residency and tax identification information, financial and investment qualification, shareholder reference number, payment details and other details of products and services purchased by you, power of attorney information, data obtained further to the Fund’s standard anti-money laundering, beneficial ownership and client due diligence checks. Such information might be provided in an application form or in other documents (as part of an application process or at other times), face-to-face, by telephone, by email or otherwise.

(b) Information that the Fund collects or generates: This might include information relating to your (or an applicant's) investment in the Fund, emails (and related data), call recordings and website usage data and we may combine personal data that you provide to us with personal data that we collect about you.

(c) Information that the Fund obtains from other sources: This might include information obtained for the purpose of the Fund's know-your-client procedures (which include anti-money laundering procedures, counter-terrorist financing procedures, politically-exposed-person checks, standard criminal record checks, sanctions checks, among other things), information from government or public bodies, public websites and other public sources and information received from the applicant's advisers or from intermediaries. It may also include data which, when aggregated with other data, enables an individual to be identified, such as an IP address and geolocation data.

Uses of your personal data

Your personal data may be stored and processed by the Fund for the following purposes:

(a) Assessing and processing applications for shares in the Fund and other share dealings, including performing know-your-client procedures and undertaking investor due diligence, issuing and redeeming shares, sending statements to you in relation to your investment in the Fund, receiving payments from and making payments to the applicant, recording your information in the registers and accounts of the Fund, calculating net asset value, and overseeing these processes.

(b) General business administration and operating the Fund on an on-going basis, including communicating with investors, communicating with service providers and counterparties, accountancy and audit services, risk monitoring, the administration of IT systems and monitoring and improving products.

(c) Compliance with legal and regulatory obligations and industry standards, including:

   (i) maintenance of statutory registers,

   (ii) carrying out know-your-client procedures, client due diligence, anti-money laundering, counter-terrorist financing and proliferation financing checks of investors (and where applicable, their controllers and beneficial owners);

   (iii) requests from regulatory, governmental, tax and law enforcement authorities;

   (iv) surveillance and investigation activities;

   (v) carrying out audit checks and to instruct auditors;

   (vi) FATCA, CRS, beneficial ownership and other comparable legislation;

   (vii) applicable sanctions and embargo legislation;

   (viii) the automatic exchange of tax information and legal judgments; and/or

   (ix) preventing and detecting fraud.

(d) In respect of information shared with Investment Manager, its business activities relating to the Fund, such as investor relations, discussions with the Fund's service providers and counterparties, decision-making in relation to the Fund, investments, business strategy, risk management, compliance, development and marketing.

The Fund is entitled to process your personal data in these ways for the following reasons:

(a) If you are the applicant, you may enter into an investment contract with the Fund and some processing will be necessary for the performance of that contract, or will be done at your request prior to entering into that contract.

(b) Processing may be necessary to discharge a relevant legal or regulatory obligation.

(c) The processing will, in all cases, be necessary for the legitimate business interests of the Fund, the Investment Manager, the Fund's administrator or another person, such as:

  (i) carrying out the ordinary or reasonable business activities of the Fund, the Authorised Entities or other persons, or other activities previously disclosed to the Fund's investors or referred to in this privacy notice;

  (ii) ensuring compliance with all legal, tax, accounting and regulatory obligations and industry standards, and preventing fraud;

  (iii) verifying the identity of the Fund to third parties in connection with any actual or proposed investments and/or for any purpose which the Fund considers is necessary or desirable;

  (iv) assisting the Fund in the improvement and optimisation of our services, advertising and marketing;

  (v) investigating any complaints, or pursuing or defending any claims proceedings or disputes (where domestic or foreign);

  (vi) providing you with, and informing you about, our investment products and services;

  (vii) for risk management and risk controlling purposes relating to the Fund;

  (viii) complying with audit requirements;

  (ix) ensuring internal compliance with our policies and procedures;

  (x) seeking professional advice, including legal advice;

  (xi) facilitating business asset transactions involving the Fund or related entities;

  (xii) monitoring communications to/ from us (where permitted by law);

  (xiii) directing marketing purposes;

  (xiv) establishing, exercising or defending legal rights or for other purposes relating to legal proceedings; and

  (xv) ensuring the security and integrity of information systems;

  (xvi) facilitating the continuation or termination of the contractual relationship between you, other investors and the Fund;

  (xvii) helping to detect, prevent, investigate, and prosecute fraud and/or other criminal activity, and sharing this data with legal, compliance, risk and managerial staff to assess suspicious activities, and against fraud, breach of confidence or theft of proprietary materials; and/or

(xviii) where you otherwise consent, the processing of personal data for any other specific purpose

(d) In respect of any processing of sensitive personal data falling within special categories, such as any personal data relating to the political opinions of a politically exposed person, the processing will be necessary for reasons of substantial public interest.

Disclosure of your personal data to third parties

The Fund may from time to time, in accordance with the purposes described above, disclose your personal data to other parties, including (a) the Authorised Entities and their affiliates, (b) professional advisers such as auditors, legal counsel and tax advisers, (c) other service providers of the Fund or the Authorised Entities, including technology service providers, (e) counterparties, and (f) courts and regulatory, tax and governmental authorities. We may also share relevant personal data where it is lawful to do so and necessary to comply with our contractual obligations or your instructions or where it is necessary or desirable to do so in connection with any regulatory reporting obligations.

In exceptional circumstances, we will share your personal data with regulatory, prosecuting and other governmental agencies or departments, and parties to litigation (whether pending or threatened), in any country or territory including to any other person where we have a public or legal duty to do so (e.g., to assist with detecting and preventing fraud, tax evasion and financial crime or compliance with a court order). At times, it may also be necessary to share relevant personal data with (i) a prospective service provider of the Fund, including one which is replacing an existing service provider, or (ii) people or companies where required in connection with a potential or actual corporate restructuring, merger, acquisition or takeover of the Fund and/or the Investment Manager.

Some of these persons will process your personal data in accordance with the Fund's instructions and others will themselves be responsible for their use of your personal data. These persons may be permitted to further disclose the personal data to other parties.

Storage and Transfers of your personal data outside the Cayman Islands or European Economic Area

We will not sell your personal data. Your personal data may be transferred to and stored by persons outside the Cayman Islands or European Economic Area (the "EEA"), and in particular may be transferred to and stored by affiliates or service providers of the Fund or the Fund's administrator outside the Cayman Islands or EEA that may not guarantee the same level of protection for personal information as the Cayman Islands or countries in the EEA.

Where personal data is transferred outside the Cayman Islands or the EEA, the Fund will ensure that the transfer is subject to appropriate safeguards or is otherwise permitted under applicable law. For example, the country to which the personal data is transferred may be approved by the European Commission or the recipient may have agreed to model contractual clauses approved by the European Commission that oblige them to protect the personal data.

You can obtain more details of the protection given to your personal data when it is transferred outside the Cayman Islands or EEA, including a copy of any standard data protection clauses entered into with recipients of your personal data, by contacting the Fund using the details set out under "Contacting the Fund" below.

The Fund will endeavour only to transfer personal information to a third party if they agree to comply with those procedures and policies, or if they put in place adequate measures themselves. Where the Fund engages a processor, to the extent required under applicable data protection law, the Fund will enter into a written contract with the processor which will set out the processor's specific mandatory statutory obligations.

Necessity of personal data for an investment in the Fund

The provision of certain personal data is necessary for shares in the Fund to be issued to any applicant and for compliance by the Fund and its service providers with certain legal and regulatory obligations. Accordingly, if certain personal data is not provided when requested, an application for shares might not be accepted, shares might be compulsorily redeemed or the Fund may take such other actions available to it under the Fund documents.

Retention of personal data

How long the Fund holds your personal data for will vary. The retention period will be determined by various criteria, including the purposes for which the Fund is using it (as it will need to be kept for as long as is necessary for any of those purposes) and legal obligations (as laws or regulations may set a minimum period for which the Fund has to keep your personal data).

Your rights

Depending on the applicable legislation, you may have a number of legal rights in relation to the personal data that the Fund holds about you. These rights include the following:

(a) The right to obtain information regarding the collection and processing of your personal data (including countries or territories to which the Fund, whether directly or indirectly, transfers your personal data, and, for the avoidance of doubt, includes countries or territories outside the Cayman Islands) and to access copies of the personal data that the Fund holds about you.

(b) In some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and the right to request that the Fund transmits that data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to the Fund.

(c) The right to request that the Fund rectifies your personal data if it is inaccurate or incomplete.

(d) The right to request that the Fund erases your personal data in some limited circumstances. Please note that there may be circumstances where you ask the Fund to erase your personal data but the Fund is legally entitled to retain it.

(e) The right to object to, and the right to request that the Fund restricts, its processing of your personal data in certain circumstances (for example: the right to require us to stop direct marketing or the right to withdraw your consent). Again, there may be circumstances where you object to, or ask the Fund to restrict, its processing of your personal data but the Fund is legally entitled to continue processing your personal data or to refuse that request.

(f) The right to be notified of a data breach (unless the breach is unlikely to be prejudicial).

(g) The right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by the Fund.

Please note that if you do not wish to provide us with requested personal data or subsequently withdraw your consent, you may not be able to invest in the Fund or remain invested in the Fund as it will affect the Fund's ability to provide its services to you and manage your investment.

You can exercise your rights by contacting us using the details set out under "Contacting the Fund" below. You can find out more information about your rights by contacting (i) an EU data regulator such as France's Information Commissioner's Office, or by searching their websites at https://www.cnil.fr/ with respect to

GDPR or (ii) the Data Protection Ombudsman of the Cayman Islands (by searching their website here: https://www.ombudsman.ky).

Changes to this notice

We encourage you to regularly review this notice and any updated notice to ensure that you are always aware of how personal data is collected, used, stored and disclosed.

Contacting the Fund

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed above, please address questions and requests to Whitney Fogle Lewis, General Counsel and Chief Compliance Officer at (214) 855-2200 or Legal.USWM@alti-global.com.

This Privacy Notice relates to the following fund entities:

Fund

1. TIG Arbitrage Enhanced Master Fund, L.P.
2. TIG Arbitrage Enhanced, Ltd.
3. TIG Arbitrage Associates (Cayman), Ltd.
4. TIG Arbitrage Associates Master Fund L.P.
5. TIG Opportunities SPC