



CGPH GROUP PRIVACY POLICY

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| Approved by | Director of CGPH Group Ltd. |
| Applies to | All CGPH Group Companies |
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1. Introduction

CGPH Group Ltd. and its subsidiaries, affiliates and controlled entities (collectively referred to as the "CGPH Group" or the "Group") are committed to protecting the privacy, confidentiality and security of the personal data entrusted to them.

The Group recognises that the responsible processing of personal data is fundamental to maintaining the confidence of clients, investors, counterparties, suppliers, employees and other stakeholders. Protecting personal information is an integral part of the Group's governance framework and reflects its commitment to transparency, accountability and compliance with applicable data protection legislation. This Privacy Policy explains how personal data is collected, used, stored, disclosed, transferred and otherwise processed by the Group during the course of its business activities.

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The Shard, 32 London Bridge St, London, London, England, SE1 9SG
phone number: +44 204 572 3910 www.cgph.info e-mail:info@cgph.info



The Policy applies to personal data processed in connection with the Group's investment banking, corporate finance, financial advisory, private debt, structured finance, capital raising, mergers and acquisitions, tokenization, real estate advisory and all other business activities carried out by the Group. This Privacy Policy shall be interpreted together with any jurisdiction-specific privacy notices that may be issued by individual Group Companies where required by applicable law.

2. Scope

This Privacy Policy applies to every company belonging to the CGPH Group.

Each Group Company acts as an independent Data Controller whenever it determines the purposes and means of processing personal data in connection with its own business activities, unless applicable law provides otherwise.

Where two or more Group Companies jointly determine the purposes and means of processing personal data, they shall comply with all legal obligations applicable to joint controllers.

This Privacy Policy applies to personal data relating to clients, prospective clients, investors, counterparties, beneficial owners, directors, shareholders, suppliers, service providers, professional advisers, employees, applicants, website users and any other individuals whose personal data is processed by the Group.

The principles contained in this Policy apply throughout the Group and supplement any local privacy notices required under applicable legislation.

3. Applicable Data Protection Laws

The Group processes personal data in accordance with applicable data protection legislation in every jurisdiction in which it operates.

Depending upon the relevant Group Company and the location of the data subject, this may include the UK General Data Protection Regulation, the European Union General Data Protection Regulation (EU) 2016/679, the UK Data Protection Act 2018, the French Data Protection Act, applicable United States

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privacy legislation, Hong Kong Personal Data (Privacy) Ordinance and any other applicable national or international data protection requirements.

Where different legal frameworks apply, the relevant Group Company shall comply with the applicable legislation governing its processing activities.

Where local legislation imposes stricter obligations than those contained in this Policy, the stricter legal requirements shall prevail.

4. Categories of Personal Data

The Group may collect and process different categories of personal data depending upon the nature of the relationship with the individual concerned:

- a) Personal identification information may include names, nationality, date and place of birth, identity documents, passport details, signatures, photographs and other information necessary to identify an individual.
- b) Contact information may include residential addresses, business addresses, telephone numbers, email addresses and other communication details.
- c) Professional information may include employment details, job titles, professional qualifications, business affiliations and corporate positions.
- d) Corporate information may include directorships, shareholder information, beneficial ownership details, powers of attorney, authorised representatives and corporate governance information.
- e) Financial information may include banking details, payment information, source of wealth, source of funds, financial statements and other information necessary to provide professional services or comply with legal obligations.
- f) Compliance information may include Know Your Customer documentation, Anti-Money Laundering records, sanctions screening results, Politically Exposed Person status, adverse media results and other due diligence documentation.

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- g) Technical information may include IP addresses, browser information, device identifiers, website usage information, cookies and similar technologies.
- h) Marketing information may include communication preferences, event registrations, newsletter subscriptions and interactions with marketing communications.

The Group does not intentionally collect special categories of personal data unless required by applicable law, necessary for compliance purposes or otherwise justified by an appropriate legal basis.

5. How Personal Data is Collected

Personal data may be collected directly from individuals when they contact the Group, request information, enter into contractual relationships, attend meetings or events, subscribe to communications, submit documentation or otherwise interact with the Group.

The Group may also obtain information from publicly available sources, regulatory authorities, professional advisers, business partners, financial institutions, publicly accessible corporate registers, sanctions databases, credit reference agencies and other lawful sources where appropriate.

Additional information may be generated during the course of providing professional services, conducting due diligence, complying with regulatory obligations or maintaining business relationships.

The Group seeks to ensure that personal data collected is adequate, relevant and limited to what is reasonably necessary for the purposes for which it is processed.

6. Purposes of Processing Personal Data

The Group processes personal data only where there is an appropriate legal basis for doing so.

Personal data may be processed for the purpose of:

- a) Establishing, managing and performing contractual relationships.
- b) Providing investment banking, financial advisory, corporate finance, fundraising, structured finance, tokenization and other professional services.
- c) Conducting client onboarding, due diligence, Know Your Customer procedures and Anti-Money Laundering compliance.

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- d) Verifying identities and beneficial ownership.
- e) Assessing financial capability and transaction suitability where appropriate.
- f) Managing client relationships and responding to enquiries.
- g) Communicating with clients, investors, counterparties and business partners.
- h) Administering contracts, invoices and payments.
- i) Managing employment relationships and recruitment activities.
- j) Operating and improving the Group's websites, systems and digital platforms.
- k) Organising meetings, conferences and corporate events.
- l) Sending newsletters, publications, invitations and marketing communications where permitted by applicable law.
- m) Protecting the security of the Group's systems, premises and information.
- n) Preventing fraud, money laundering, terrorist financing and other financial crime.
- o) Complying with legal, regulatory, accounting and reporting obligations.
- p) Establishing, exercising or defending legal claims.
- q) Supporting internal governance, audit, compliance, risk management and business continuity activities.

The Group shall process personal data only to the extent reasonably necessary for the relevant purpose and shall not use personal information in a manner incompatible with the purposes for which it was originally collected.

7. Legal Bases for Processing Personal Data

The Group processes personal data only where there is a lawful basis for doing so under the applicable data protection legislation.

Depending on the nature of the processing activity, personal data may be processed because it is necessary for the performance of a contract or in order to take steps prior to entering into a contractual relationship.

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Processing may also be necessary to comply with legal or regulatory obligations applicable to the relevant Group Company, including obligations relating to anti-money laundering, counter-terrorist financing, sanctions compliance, taxation, accounting, corporate governance and regulatory reporting. The Group may process personal data where necessary for its legitimate interests, provided that such interests are not overridden by the rights and freedoms of the individual concerned. Legitimate interests may include the protection of the Group's business, the prevention of fraud and financial crime, business development, client relationship management, service improvement, cybersecurity, internal administration and the defence of legal claims.

Where required by applicable law, personal data shall be processed on the basis of the individual's consent. Consent may be withdrawn at any time without affecting the lawfulness of processing carried out before such withdrawal.

Where processing is based upon another lawful basis, withdrawal of consent shall not affect those processing activities that remain lawful under other applicable legal grounds.

8. Sharing of Personal Data

The Group may share personal data with other Group Companies where necessary for legitimate business purposes, internal administration, risk management, regulatory compliance, client relationship management or the provision of professional services.

Personal data may also be shared with carefully selected third parties where such disclosure is necessary for the operation of the Group's business or required by applicable law.

Recipients may include:

- a) Professional advisers.
- b) Auditors.
- c) Financial institutions.
- d) Payment service providers.
- e) Cloud service providers.
- f) Information technology providers.

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- g) Customer relationship management platform providers.
- h) Document management providers.
- i) Communication service providers.
- j) Marketing service providers.
- k) Regulatory authorities.
- l) Law enforcement agencies.
- m) Government authorities.
- n) Courts and tribunals.
- o) Insurance providers.
- p) External consultants.
- q) Business partners involved in transactions or professional engagements.

The Group shall take reasonable steps to ensure that third-party recipients process personal data in accordance with applicable data protection legislation and appropriate contractual safeguards.

The Group does not sell personal data to third parties.

9. International Transfers of Personal Data

Due to the international nature of the Group's business activities, personal data may be transferred to, stored in or accessed from jurisdictions outside the country in which it was originally collected.

Where international transfers occur, the Group shall ensure that appropriate safeguards are implemented in accordance with applicable data protection legislation.

Such safeguards may include adequacy decisions adopted by competent authorities.

Standard Contractual Clauses or equivalent contractual safeguards.

Binding Corporate Rules where applicable.

Other legally recognised transfer mechanisms.

The Group shall take reasonable steps to ensure that international transfers provide an appropriate level of protection for personal data consistent with applicable legal requirements.

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10. Data Retention

Personal data shall be retained only for as long as necessary to fulfil the purposes for which it was collected or to comply with applicable legal, regulatory, contractual or operational requirements.

Retention periods may vary depending upon the nature of the information and the applicable legal obligations.

Customer Due Diligence documentation, Anti-Money Laundering records and related compliance information may be retained for the period required by applicable legislation.

Accounting and financial records shall be retained in accordance with applicable accounting and tax legislation.

Marketing information shall be retained until consent is withdrawn or until the information is no longer required for legitimate business purposes.

Recruitment information shall be retained only for the period reasonably necessary for recruitment purposes and any applicable legal obligations.

Where legal proceedings, investigations or regulatory matters are ongoing, relevant information may be retained for longer periods where necessary to protect the legitimate interests of the Group or to comply with legal obligations.

At the end of the applicable retention period, personal data shall be securely deleted, anonymised or otherwise disposed of in accordance with the Group's Record Keeping Policy and applicable legal requirements.

11. Security of Personal Data

The Group is committed to protecting personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

Appropriate technical and organisational measures shall be implemented having regard to the nature of the information processed, the risks presented by the processing activities and the state of available technology.

Security measures may include:

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- a) Access controls.
- b) Authentication procedures.
- c) Encryption technologies.
- d) Secure communication channels.
- e) Cybersecurity monitoring.
- f) Network protection.
- g) Business continuity arrangements.
- h) Data backup procedures.
- i) Physical security measures.
- j) Personnel training.

Access to personal data shall be limited to authorised individuals who require such access for legitimate business purposes.

The Group regularly reviews its security measures to ensure that they remain appropriate to evolving technological developments and emerging cyber risks.

12. Rights of Data Subjects

Subject to applicable legislation, individuals may have the right to:

- a) Request access to their personal data.
- b) Request the correction of inaccurate or incomplete information.
- c) Request the deletion of personal data where legally appropriate.
- d) Request restrictions on certain processing activities.
- e) Object to processing based upon legitimate interests.
- f) Withdraw consent where processing is based upon consent.
- g) Request the transfer of personal data to another organisation where applicable.
- h) Request information regarding the processing of their personal data.
- i) Object to direct marketing communications.
- j) Exercise rights relating to automated decision-making where applicable.

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k) Requests relating to data protection rights shall be submitted to the relevant Group Company responsible for the processing activity or to the contact details provided in this Privacy Policy. The Group may request reasonable proof of identity before responding to requests in order to protect personal data against unauthorised disclosure.

Where permitted by applicable law, the Group may decline or limit requests where legal exemptions apply.

13. Marketing Communications

The Group may process personal data for legitimate marketing and business development purposes where permitted by applicable law.

Marketing communications may include:

- a) Newsletters.
- b) Event invitations.
- c) Corporate publications.
- d) Industry updates.
- e) Market insights.
- f) Information regarding the Group's services.
- g) Professional announcements.

Marketing communications shall only be sent where an appropriate legal basis exists.

Individuals may opt out of receiving marketing communications at any time by following the unsubscribe instructions included within electronic communications or by contacting the relevant Group Company directly.

Withdrawal from marketing communications shall not affect communications necessary for the administration of existing contractual relationships or compliance with legal obligations.

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14. Cookies and Similar Technologies

The Group's websites may use cookies and similar technologies to improve functionality, enhance user experience, analyse website performance and support legitimate business operations.

Cookies may be used to remember user preferences, maintain security, generate website analytics and improve the performance of digital services.

Where required by applicable law, users shall be provided with appropriate information regarding the use of cookies and shall have the opportunity to manage their cookie preferences.

Further information regarding the use of cookies may be provided through a separate Cookie Policy or Cookie Notice published on the relevant Group Company's website.

15. Automated Decision-Making

The Group does not ordinarily make decisions based solely on automated processing that produce legal or similarly significant effects on individuals.

Where automated processing is used to support operational activities, compliance procedures, fraud prevention or risk assessments, appropriate human oversight shall be maintained.

Where applicable law grants individuals rights relating to automated decision-making or profiling, the relevant Group Company shall ensure that such rights are respected.

16. Children's Personal Data

The Group's services are intended exclusively for businesses, professional investors, institutional clients and adult individuals.

The Group does not knowingly collect personal data relating to children or minors unless required by applicable law or in exceptional circumstances connected with a legitimate business relationship.

Where the Group becomes aware that personal data relating to a child has been collected without an appropriate legal basis, reasonable steps shall be taken to delete such information promptly, subject to any applicable legal obligations.

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17. Personal Data Breaches

The Group is committed to maintaining effective procedures for identifying, assessing and responding to personal data breaches.

A personal data breach includes any accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

Where a personal data breach occurs, the relevant Group Company shall assess the nature and potential impact of the incident and shall take appropriate measures to contain, investigate and remediate the breach.

Where required by applicable law, the relevant supervisory authority and affected individuals shall be notified within the applicable legal timeframes.

All personal data breaches shall be documented and reviewed in order to strengthen the Group's data protection framework and reduce the likelihood of similar incidents occurring in the future.

18. Changes to this Privacy Policy

The Group reserves the right to amend or update this Privacy Policy from time to time to reflect changes in applicable legislation, regulatory guidance, business activities, technological developments or internal governance arrangements.

The most recent version of this Privacy Policy shall be published through the appropriate communication channels, including the websites of the relevant Group Companies where appropriate.

The Effective Date indicated on this Policy shall identify the version currently in force.

Continued interaction with the Group following publication of an updated Privacy Policy may constitute acknowledgement of the revised version where permitted by applicable law.

19. Contact Information

Questions regarding this Privacy Policy or the processing of personal data may be addressed to the relevant Group Company acting as Data Controller.

General enquiries regarding data protection within the CGPH Group may be directed to:

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CGPH Group Ltd.

Group Legal & Compliance

Email: info@cgph.info

Website: www.cgph.group

Where a specific Group Company has appointed a Data Protection Officer or designated privacy contact under applicable law, the relevant contact details shall be made available through that company's privacy notice or website.

20. Applicable Law

This Privacy Policy shall be interpreted in accordance with the applicable data protection legislation governing the relevant processing activity.

Nothing contained in this Privacy Policy shall limit or restrict any rights available to individuals under applicable data protection laws.

Where mandatory legal requirements differ between jurisdictions in which the Group operates, the relevant Group Company shall comply with the legislation applicable to its processing activities.

21. Review

This Privacy Policy shall be reviewed periodically to ensure that it remains accurate, effective and consistent with the Group's activities, technological developments and applicable legal and regulatory requirements.

Material amendments shall be approved in accordance with the Group's internal governance framework.

22. Final Provisions

The protection of personal data is a fundamental component of the CGPH Group's commitment to integrity, professionalism and responsible corporate governance.

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Every Group Company is committed to processing personal data lawfully, fairly, transparently and securely while respecting the rights and legitimate interests of the individuals whose information it processes.

Through the implementation of appropriate technical, organisational and governance measures, the Group seeks to maintain the highest standards of data protection, strengthen the confidence of its clients and stakeholders, and ensure continued compliance with evolving legal and regulatory requirements.

APPENDIX A

CGPH Group Companies Acting as Independent Data Controllers

Unless otherwise stated or required by applicable law, each company within the CGPH Group acts as an independent Data Controller in relation to the personal data processed in connection with its own business activities.

The Group currently includes, among others, the following entities:

| Company | Jurisdiction |
|---|---------------------|
| CGPH Group Ltd. | United Kingdom |
| CGPH Banque d'affaires | France |
| CGPH Asset Management S.A.S. | France |
| Credit Glorious Property Holdings Ltd. | United Kingdom |
| CGPH Group Inc. | United States |
| Credit Glorious Property Holdings Ltd. | Hong Kong |
| Silk Prosperity Glorious Property Holdings Ltd. | Hong Kong |
| Silk Road Glorious Property Holdings Ltd. | Hong Kong |

Additional Group Companies may become Data Controllers where they process personal data in connection with their own business activities.

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The most up-to-date list of Group Companies may be made available through the Group's corporate website or upon request.

Approved by:

Director of CGPH Group Ltd.

Date: July 1, 2026

Signature: _____

Name: Kolyo Boichev

Title: Director

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