ANNEX 5: PRIVACY POLICY

Ithuba FinMill GmbH – Stallburg Digital Carry

Annex to the Investment Agreement | 22 July 2026 | Version 1

INFORMATION NOTICE

Ithuba FinMill GmbH ("Ithuba FinMill", "AIFM", "we") processes personal data of Investors in connection with the management of the Ithuba Stallburg Digital Carry (the "Fund"). This Privacy Policy sets out the nature, scope and purpose of such data processing and the rights of data subjects pursuant to Regulation (EU) 2016/679 ("GDPR") and the Austrian Data Protection Act (Datenschutzgesetz – "DSG").

This Annex forms an integral part of the Investment Agreement. Defined terms used but not defined herein have the meanings ascribed to them in the Investment Agreement.

1. Controller

The controller within the meaning of Article 4(7) GDPR is:

Company	Ithuba FinMill GmbH
Register number	FN 488607s (Commercial Court Vienna)
Address	Stallburggasse 4, 1010 Vienna, Austria
Data protection contact	dataprotection@ithubacapital.com

Ithuba FinMill GmbH acts as controller in respect of all personal data processed in connection with the management of the Fund, the administration of the Unit Register, investor onboarding and KYC/AML compliance.

2. Data Protection Officer

Ithuba FinMill GmbH is not required to designate a data protection officer pursuant to Article 37 GDPR given the scale and nature of its processing activities. Enquiries concerning the processing of personal data may be directed to the data protection contact address set out in Section 1.

3. Categories of Personal Data Processed

We process the following categories of personal data in connection with the Fund:

3.1 Identity and KYC/AML Data

- Full legal name, date and place of birth, nationality
- Residential and, if applicable, registered business address
- Identity documents (passport, identity card, residence permit) and document copies
- Tax identification number(s) and country of tax residence
- Information on professional investor status pursuant to § 2(1) no. 33 AIFMG
- Information on beneficial ownership (UBO) pursuant to §2 WiEReG, including ownership and control structures

- PEP (politically exposed person) status and screening results
- Sanctions and embargo screening results
- Source-of-funds and source-of-wealth information
- Bank account details of the Investor (for subscription and redemption payments)

3.2 Investment and Transaction Data

- Investor name, number of Units held, subscription dates and subscription NAV (Unit Register)
- Subscription amounts, redemption amounts and redemption payment records
- Transaction history and correspondence relating to the Fund
- Ongoing transaction monitoring data pursuant to the FM-GwG

3.3 Communication Data

- E-mail address and contact details provided in the Subscription Form or subsequent correspondence
- Log-in credentials and access records for the password-protected investor area on the AIFM's website
- Records of communications between the Investor and the AIFM

4. Purposes and Legal Bases of Processing

The following table sets out the purposes for which we process personal data and the applicable legal basis under Article 6 GDPR:

Purpose	Legal Basis	Data Categories
Performance of the Investment Agreement: investor onboarding, maintenance of the Unit Register, NAV communication, processing of subscriptions and redemptions	Art. 6(1)(b) GDPR (contract performance)	Sections 3.1, 3.2, 3.3
KYC/AML compliance: identity verification, PEP and sanctions screening, transaction monitoring pursuant to the FM-GwG and AIFMG; suspicious activity reporting to the A-FIU	Art. 6(1)(c) GDPR (legal obligation)	Sections 3.1, 3.2
Regulatory reporting obligations: notification and reporting to the FMA pursuant to the AIFMG; regulatory record-keeping	Art. 6(1)(c) GDPR (legal obligation)	Sections 3.1, 3.2
Tax reporting: provision of information necessary for Investors' tax reporting obligations (e.g. Austrian Kapitalertragsteuer-related information)	Art. 6(1)(c) GDPR (legal obligation)	Sections 3.1, 3.2
Fraud prevention, security and compliance monitoring; enforcement of rights under the Investment Agreement	Art. 6(1)(f) GDPR (legitimate interests of the AIFM and of all Investors in the security and integrity of the Fund)	Sections 3.1, 3.2, 3.3

Where the processing is based on Article 6(1)(f) GDPR, the Investor may object to processing at any time on grounds relating to his or her particular situation. Please address any such objection to dataprotection@ithubacapital.com. We will cease the relevant processing unless we can demonstrate compelling legitimate grounds that override the interests, rights and freedoms of the Investor, or where processing is necessary for the establishment, exercise or defence of legal claims.

5. Recipients of Personal Data

We may disclose personal data to the following categories of recipients:

Category of Recipient	Purpose	Legal Basis
Statutory auditors and tax advisors	Audit of Fund accounts; tax advisory and reporting	Art. 6(1)(c) GDPR
External legal advisors	Legal advice in connection with Fund operations; enforcement of contractual rights	Art. 6(1)(b)/(f) GDPR
Austrian Financial Market Authority (FMA)	Regulatory notifications and reporting pursuant to § 1(5) no. 5 AIFMG and other applicable provisions	Art. 6(1)(c) GDPR
Austrian Financial Intelligence Unit (A-FIU / Geldwäschemeldestelle)	Mandatory suspicious activity reporting pursuant to § 16 FM-GwG	Art. 6(1)(c) GDPR
IT service providers and data processors	Hosting, IT infrastructure, investor portal; acting as processors under Article 28 GDPR data processing agreements	Art. 6(1)(b)/(f) GDPR

Crypto Asset Service Providers (CASPs) and exchanges used by the Fund for operational crypto asset transactions do not receive personal data of Investors. Interactions with CASPs are conducted using pseudonymous wallet addresses and exchange sub-accounts maintained in the name of the AIFM.

6. Transfers to Third Countries

Personal data of Investors are generally processed within the European Economic Area (EEA). Where we engage professional service providers (e.g. external legal or tax advisors) established outside the EEA, we ensure that an adequate level of data protection is in place through one of the following mechanisms:

- An adequacy decision by the European Commission pursuant to Article 45 GDPR; or
- Standard Contractual Clauses (SCCs) approved by the European Commission pursuant to Article 46(2)(c) GDPR, supplemented where necessary by additional technical and organisational measures.

As noted in Section 5, CASPs and exchanges used for operational Fund transactions do not receive personal data of Investors and are therefore not subject to the third-country transfer framework.

7. Retention Periods

We retain personal data for the following periods:

Category	Retention Period	Legal Basis
KYC/AML identity documents and verification records	5 years after termination of the business relationship	§39 FM-GwG
Unit Register, investment and transaction records, contractual documentation	7 years after the end of the financial year in which the record was created	§212 UGB (Austrian Commercial Code)
Communication data (e-mail correspondence, investor portal logs)	3 years after the end of the calendar year in which the last communication took place, unless a longer period is required by the above	Art. 6(1)(f) GDPR / §1489 ABGB
All categories (where deletion conflicts with legal retention obligations)	Until expiry of the applicable statutory retention or limitation period; processing is restricted to storage only during this period	Art. 17(3) GDPR

8. Rights of Data Subjects

Subject to the conditions and limitations set out in the GDPR and the DSG, each Investor has the following rights with respect to his or her personal data:

Right	Description
Access (Art. 15 GDPR)	Right to obtain confirmation of whether we process personal data and, if so, to receive a copy of that data together with information on the processing.
Rectification (Art. 16 GDPR)	Right to have inaccurate personal data corrected and incomplete personal data completed without undue delay.
Erasure (Art. 17 GDPR)	Right to request deletion of personal data. This right is limited where we are required by law to retain the data (see Section 7) or where processing is necessary for the establishment, exercise or defence of legal claims.
Restriction of processing (Art. 18 GDPR)	Right to request that we restrict processing of personal data in certain circumstances (e.g. while the accuracy of the data is contested, or where an objection has been lodged and verification of our legitimate grounds is pending).
Data portability (Art. 20 GDPR)	Right to receive personal data provided on the basis of contract (Art. 6(1)(b) GDPR) in a structured, commonly used and machine-readable format, and to transmit such data to another controller.
Objection (Art. 21 GDPR)	Right to object at any time to processing based on Art. 6(1)(f) GDPR (legitimate interests). Processing will cease unless we demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or where processing is necessary for the establishment, exercise or defence of legal claims.

To exercise any of the above rights, please contact us at dataprotection@finmill.com. We will respond within the timeframes required by applicable law (in general, within one calendar month of receipt of the request, extendable by a further two months where necessary).

We may request proof of identity before responding to a data subject request.

9. Right to Lodge a Complaint

Without prejudice to any other administrative or judicial remedy, every data subject has the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement, if the data subject considers that the processing of personal data relating to him or her infringes the GDPR.

The competent supervisory authority in Austria is:

Authority	Austrian Data Protection Authority (Datenschutzbehörde – DSB)
Address	Wickenburggasse 8, 1080 Vienna, Austria
Website	www.dsb.gv.at
E-mail	dsb@dsb.gv.at

10. Automated Decision-Making and Profiling

We do not make decisions based solely on automated processing, including profiling, that produce legal effects concerning Investors or similarly significantly affect them within the meaning of Article 22 GDPR.

PEP screening, sanctions screening and transaction monitoring are carried out using automated tools. However, the output of these tools is always reviewed by our AML Officer before any decision (such as compulsory redemption or reporting to the A-FIU) is taken. No binding decision is made on the basis of automated processing alone.

11. Technical and Organisational Security Measures

We implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk in accordance with Article 32 GDPR, including:

- Access controls and authentication measures for systems containing personal data
- Encryption of personal data in transit and, where appropriate, at rest
- Confidentiality obligations and data protection training for personnel with access to personal data
- Contractual data processing agreements with all processors in accordance with Article 28 GDPR
- Regular review of security measures in light of the state of the art

12. Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in applicable law, our data processing activities, or other relevant developments. Any material changes will be communicated to Investors in writing (e.g. by e-mail) prior to taking effect. The current version of this Privacy Policy is available at dataprotection@ithubacapital.com upon request.

The version number and effective date are indicated in the footer of this document.