

CYBER SECURITY

Customer Data Policy

FUNDS  AXIS

Policy title:	Cyber Security Policy: Customer Data Policy
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Issue	1.0
Approved by:	Darren Burrows
Approval Date:	March 2024
Next Review Date:	March 2025

Scope:	The policy applies to Funds-Axis Group and all contractors and other people working on behalf of the company.
Responsibility for Implementation & Training:	Day to day responsibility for implementation: ISO Day to day responsibility for training: ISO

Distribution methods:	Methods used to communicate this policy: <ul style="list-style-type: none">• Information Security Training Module
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1. Background

Funds-Axis is a technology-based business which involves the processing, management, and transfer of a large amount of Customer and other data on a daily basis.

The largest volume of data handled by the company relates to Customer Data in respect of the technology solutions provided by Funds-Axis.

2. Scope

This Policy is a supplementary policy detailing certain specific policies in respect of Customer Data, including in respect of data acquisition, data transmission, processing, storage, archive, and destruction.

3. The Customer Data Officer

The Customer Data Officer is a team member responsible for ensuring that the Customer's data journey with Funds-Axis, which includes data acquisition, transmission, processing, storage, archiving, and destruction, is compliant with this Customer Data Policy.

4. The Funds-Axis Group

The Funds-Axis Group comprises Funds-Axis Limited and our 100% subsidiary, Fundsaxis India Private Limited. When delivering solutions and services to Customers, we may leverage the expertise of the team across the entire Funds-Axis Group. Therefore, all entities within the Funds-Axis Group, including those mentioned above and any other subsidiaries, are subject to this Policy, as well as other business Policies.

5. Customer Data Lifecycle

5.1 Receipt of data

All data received from clients must be transmitted securely through one of the following methods:

- Secure download from source system
- Secure FTP transfer
- Secure email

5.2 Data Access

Access to Customer Data within the Funds-Axis Group must be in accordance with the Funds-Axis Cyber Security Policy: Internal Organisational Arrangements.

5.3 Data Processing

Customer data will typically require acquisition, transformation, loading into our applications followed by review and potentially correction.

Funds-Axis strives to automate these processes as much as possible to minimize manual downloading, manipulating, or uploading of data. This is done to promote efficiency and reduce the risk of manual errors or data loss.

Depending on the solutions subscribed to or the data formats provided by the Customer, manual activity may still be necessary.

5.4 Customer data transmission

1. Any internal or outward communications involving Customer Data must be sent by:
 - \ Secure FTP data
 - \ Password protected documents sent as attachments to e-mails.
 - \ email transmission is encrypted through opportunistic TLS.
2. To avoid manual error, outward manual communication of Customer Data is discouraged. Instead, the focus should be on Customers accessing data through secure online applications or automated reports.
3. The transfer of any Customer data outside of Funds-Axis Group (except to the respective client) is strictly prohibited.
4. Without the Customer's express prior consent, there must be no communication of Customer Data to other third parties outside of the Funds-Axis Group, including to any third-party system or solution providers, or consultants.
5. Unless otherwise disclosed to the Customer, where Funds-Axis uses any third-party solutions, these will be within the Funds-Axis controlled cloud computing architecture and the third-party providers will have no access to this. Where third party support is required (new releases, bug fixes etc) this will be obtained securely and without the third party having any access to Customer Data. Where you utilise the Fundpeak factsheets services or the StatPro risk services, this will involve transfer of data to those entities.

5.5 Data Storage - source records and data deletion

The Funds-Axis solutions are made available based upon source data (primarily holdings and NAV data) which is provided by the Customer and / or its Administrators.

This data is then processed and enriched by Funds-Axis. The Funds-Axis solutions include data integrity checks in respect of accuracy, validity, and completeness of the data.

Funds-Axis do not retain copies of the original source or derived data, except for the data that is stored within our solutions. Other versions of the data will be purged including from our email systems, SFTP data capture, and from our internal Networks. This will be done as soon as possible, but in any case, within 90 days of receipt.

Where required, Customer should maintain its own copies of original source data provided by the Customer (or its delegates) to Funds-Axis for the purposes of the provision of the service, or ensure that

original source data can be obtained from Administrators etc.

5.6 Client Exit and Data Archiving

On the termination of service, Funds-Axis will continue to support the client during the notice period.

To support the transition, a range of Customer Data and results is available to the client via the application UI. Additionally, where agreed, Funds-Axis will provide the Customer with a data transition strategy on a reasonable time and materials basis.

Unless otherwise agreed, Funds-Axis will have no other responsibilities as regards data transition or archiving. Further, within 90 days of termination of service, Funds-Axis will ensure the deletion of the data from its systems and from the PCCI and any sub-outsourcer.

6. Personal Data / Investor Data

Customers are advised not to transmit any data regarding investors into investment funds to Funds-Axis, as this is not necessary for the solutions/services provided.

7. Incident Management

Any exceptions must be managed in compliance with the Funds-Axis Incident Management Policy.

END

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