Privacy Policy & Data Protection Notice

Alice Investment Management Holding Ltd. · Effective July 2026

Data Controller & Governing Law

This website is controlled by Alice Investment Management Holding Ltd. Processing operations are built to respect the structural principles of the DIFC Data Protection Law No. 5 of 2020 alongside EU GDPR international best practices.

1. Purpose & Scope

This Policy covers the Alice–LTL Investor Information Portal (alice-ltl.com), operated by or on behalf of Alice Investment Management Holding Ltd. ("AIM", "we", "us"). It applies to two layers: a public access gate, which contains general information only and collects the details submitted through the access-request form together with passive technical data; and a credentialed data room, restricted to approved investors whose eligibility has been verified, through which they access confidential offering materials.

By using the Portal, you acknowledge that you have read this Policy and consent to the processing of your data as described herein.

2. Data We Collect

2.1 Access-Request Data (public layer)

- Full name
- Work/business email
- Firm or institution
- Optional free-text message

2.2 Access & Authentication Data (Investor Portal)

- Investor identity assigned upon approval
- Legal name of the investing entity (where applicable)
- Magic-link sign-in / authentication records
- IP address, browser type, device information, and session timestamps
- Session activity logs, including pages viewed and documents downloaded

2.3 Document Access Data

- Records of which documents have been accessed or downloaded from the document vault
- Timestamp and version of each document accessed
- NDA execution status, where applicable

2.4 Communication & IR Data

- Enquiries submitted through the Investor Relations channel
- Email correspondence with the Investor Relations team
- Meeting or call records, where applicable

3. Legal Basis for Processing

We process your personal data under the DIFC Data Protection Law No. 5 of 2020 (as amended) on the following bases:

- Legal obligation — to comply with applicable AML/CFT laws, DFSA regulatory requirements once authorisation is in place, FATCA and CRS obligations, and applicable securities law reporting requirements
- Legitimate interests — to maintain Portal security, prevent fraud, maintain accurate investor and access records, and facilitate the legitimate business operations of Alice Investment Management Holding Ltd.
- Consent — where you have explicitly consented, including consent to electronic delivery of documents.

4. Disclosure & Sharing

We do not sell or monetize tracking data. Authorized log information and corporate request details are shared strictly on a need-to-know basis with:

- Our Appointed Legal Advisers: Including Matouk Bassiouny (MENA Advisory), Rutan & Tucker LLP (U.S. Counsel), and DLA Piper (Listing Support).
- The Asset Issuer: LTL Multifamily II B.V. (Netherlands), solely for institutional tracking of inbound documentation requests.
- Technology Infrastructure Providers: Secure enterprise data rooms and encrypted hosting architectures operating under strict data processing agreements.

Because this transaction involves cross-border institutional capital frameworks across the UAE, European Union, and United States, your logged session metadata may cross international borders under standard data protection clauses.

5. Data Retention

- KYC/AML records held under applicable anti-money-laundering obligations: minimum 6 years from end of business relationship (per DIFC AML Law requirements)
- Access-request and investor records: duration of bond term plus 7 years
- Portal access logs: 12 months from date of access
- Investor relations communications: 5 years from date of correspondence
- Document access records: duration of bond term plus 5 years

After applicable retention periods, data is securely deleted or anonymised in accordance with our data lifecycle procedures.

6. Complaints & Supervisory Authority

If you have a concern about how Alice Investment Management Holding Ltd. handles your personal data, contact us in the first instance at ir@alice-ltl.com. If you are not satisfied with our response, you may lodge a complaint with the DIFC Commissioner of Data Protection, DIFC, PO Box 74777, Dubai, UAE (difc.ae/business/operating/data-protection). Investors based in other jurisdictions may also have the right to contact their local supervisory authority.

7. Amendments

Alice Investment Management Holding Ltd. reserves the right to amend this Privacy Policy at any time. Where changes are material, we will notify credentialed investors via the Portal or by email to the address registered in the investor file. Continued use of the Portal following notification of changes constitutes acceptance of the updated Policy