

INVESTOR PRIVACY NOTICE

1. INTRODUCTION

We, Mitsubishi UFJ Investor Services & Banking (Luxembourg) S.A., provide certain services to investment funds and their delegates, such as management companies or AIFMs. As a result, we process your personal data, as data processor, on behalf of the funds and their delegates. This processing is made in compliance with the GDPR and any applicable laws or regulations relating to the protection of personal data.

This privacy notice explains how we and our affiliates process and protect your personal data, and applies to the services the funds and/or their delegates provide to you with our assistance.

This privacy notice only applies to natural persons (individual investors or individuals linked to legal entities acting as investors) and not to legal entities.

More details on the funds and their delegates' processing of your personal data can be found in their respective privacy notices, which you may enquire directly from them.

2. HOW DO WE PROCESS PERSONAL DATA?

We collect your personal data either directly from you, from other data subjects, from the funds and/or their delegates, through publicly accessible sources, or other third-party data sources.

In certain circumstances, we are data controller for our own purposes. This includes managing, testing, securing, and optimising our systems and compliance with our own legal obligations in accordance with applicable laws and regulations (such as know your customer and anti-money laundering obligations) and/or with an order of a competent jurisdiction or authority.

3. WHY DO WE COLLECT PERSONAL DATA?

We process your personal data as data processor in the following situations:

Categories of personal data	Purposes
<ul style="list-style-type: none">• Personal identification data, including electronic identification data and identification data issued by public authorities (passport or national ID)• Bank and financial data such as account numbers and type and number of shares held• Personal details such as gender, age, date of birth, etc.• Education• Professional and employment details such as employer, position, professional contact details• Judicial data, criminal records, criminal offences, or convictions and similar• Political status	<p>Providing investment services to you or the investor you are representing such as opening an account, for subscriptions and redemptions, verifying transfer agent registers, for contract notes, client reporting, cash transfers, shareholder notices and meetings, proxy voting, corporate actions, and dividend distribution.</p>
<ul style="list-style-type: none">• Personal identification data, including electronic identification data and identification data issued by public authorities (passport or national ID)• Bank and financial data such as account numbers and type and number of shares held• Personal details such as gender, age, date of birth, etc.• Professional and employment details such as employer, position, professional contact details	<p>Managing customer communications, relations, and complaints.</p>

From time to time, we process your personal data as data controller for our own purposes:

Categories of personal data	Purpose	Legal basis
<ul style="list-style-type: none"> • Personal identification data, including electronic identification data and identification data issued by public authorities (passport or national ID) • Bank and financial data such as account numbers and type and number of shares held • Personal details such as gender, age, date of birth, etc. • Education • Professional and employment details such as employer, position, professional contact details • Judicial data, criminal records, criminal offences or convictions and similar • Political status • Image and sound 	<p>Providing in-house legal advice and handling and defending legal claims.</p>	<p><i>Legitimate interest.</i> The processing is necessary to satisfy our legitimate interest of providing inhouse legal advice and for litigation management.</p>
	<p>Managing, testing, securing and optimising our systems and infrastructure, through measures such as managing IT assets, controlling building access, video surveillance, maintaining and using document archiving systems, managing access rights, testing system and applications, monitoring email systems, managing technical incidents and providing user support, maintaining and using incident and threat management systems, ensuring business continuity and disaster recovery and applying whistleblowing processes.</p>	<p><i>Legitimate interest.</i> The processing is necessary to satisfy our legitimate interest of managing, testing, securing, and optimising our systems and infrastructure.</p>
	<p>Fulfilling legal and regulatory obligations such as bookkeeping and accounting requirements and obligations under data protection regulations, other obligations under applicable fund law, internal and external audits, prevention of terrorism financing law, anti-money laundering law (such as carrying out customer due diligence), prevention and detection of crime and tax law (such as reporting under the FATCA and the CRS laws).</p>	<p><i>Legal obligation.</i> The processing is necessary to fulfill our legal obligations.</p>

4. TO WHOM DO WE TRANSFER PERSONAL DATA?

We disclose and/or transfer personal data to our affiliates and service providers (banking and fund services providers, IT service providers, auditors, lawyers, external consultant and any third party you may designate).

We or our affiliates may disclose and/or transfer personal data to authorities, for instance when reporting any relevant information in relation to your investments in the funds or in relation to the investment of the investor you are representing to the Luxembourg tax authorities (*Administration des contributions directes*) and any other authority if this is required by law.

If you don't provide relevant personal data requested by us or our delegates during your relationship with the funds, it may prevent you or the investor you are representing from continuing to hold shares or units in the funds and may be reported to the relevant Luxembourg authorities.

The recipients of your personal data may act as data processors on our behalf or, in certain circumstances, as data controllers for their own purposes.

We will not transfer personal data to anyone else than the categories of recipients mentioned in this notice, unless we inform you beforehand or unless required or permitted by applicable laws and regulations.

5. WHERE DO WE TRANSFER PERSONAL DATA?

We transfer your personal data to recipients located outside of the European Economic Area in countries which do not offer the same level of data protection as in the European Economic Area or where data protection laws might not exist - in which case they are marked with a "*" in the table below. If this is the case, we will apply adequate safeguards in accordance with GDPR provisions.

You may request the complete list of our affiliates and service providers, as well as details on the above adequate safeguards, by contacting our Data Protection Office (DPO) using the contact information provided in point 0.

The table below sets out the different categories of recipients, their location and which legal basis justify the transfer of your personal data to these recipients.

Where necessary, transfers to third countries will only occur when appropriate safeguards are in place such as the Standard Contractual Clauses as approved by the European Commission as well as organisational and technical security measures.

Categories of Recipients	Location	Legal basis for the transfer
<p>Banking and investment funds service providers. Further information can also be found at https://www.mufg-investorservices.com/privacy-policy/.</p>	<p>These recipients are in:</p> <p>Bermuda* Canada* Cayman Islands* Cyprus Ireland Japan Singapore* United Kingdom United States of America*</p>	<p>We transfer personal data to banking and investment funds service providers based on the following legal basis:</p> <ul style="list-style-type: none"> • appropriate safeguards in case of transfer to third party countries not benefitting from an adequacy decision (such as the Standard Contractual Clauses as approved by the European Commission); • for the performance of our services to the funds and/or their delegates in connection with an investment in the funds; • for the establishment, exercise or defence of legal claims; • because the transfer is made from a register which is legally intended to provide information to the public.
<p>IT service providers</p>	<p>These recipients are in:</p> <p>Luxembourg Poland Hungary</p>	<p>We transfer personal data to IT service providers based on the following legal basis:</p> <ul style="list-style-type: none"> • for the performance of our services to the funds and/or their delegates in connection with an investment in the funds.

Auditors	These recipients may be in any country of the world depending on the nature of the services provided and as instructed by the Funds. These countries typically include Ireland, the Cayman Islands and Luxembourg.	<p>We transfer personal data to auditors:</p> <ul style="list-style-type: none"> • appropriate safeguards in case of transfer to third party countries not benefitting from an adequacy decision (such as the Standard Contractual Clauses as approved by the European Commission); • for the performance of our services to the funds and/or their delegates in connection with an investment in the funds; • because the transfer is made from a register which is legally intended to provide information to the public; • for the purposes of compelling legitimate interests pursued by you or us, to the extent permitted by data protection law.
Lawyers	These recipients may be in any country of the world depending on the nature of the services provided.	<p>We transfer personal data to lawyers:</p> <ul style="list-style-type: none"> • for the establishment, exercise or defence of legal claims; • for the purposes of compelling legitimate interests pursued by you or us, to the extent permitted by data protection law.
External consultants	These recipients may be in any country of the world depending on the nature of the services provided.	<p>We transfer personal data to external consultants:</p> <ul style="list-style-type: none"> • for the purposes of compelling legitimate interests pursued by you or us, to the extent permitted by data protection law.

6. HOW LONG DO WE STORE PERSONAL DATA (RETENTION PERIOD)?

We will hold your personal data for as long as you or the investor you are representing hold shares or units in the fund and for 10 years after the date on which you or the investor you are representing no longer own shares or units in the fund. This allows us to comply with applicable laws and regulations or to establish, exercise or defend actual or potential legal claims. We will retain your personal data for longer only if it is required by applicable laws and regulations.

In any case, we will not hold your personal data for longer than necessary to fulfil their purpose.

7. HOW DO WE KEEP YOU INFORMED ABOUT PERSONAL DATA PROCESSING?

This privacy notice provides you with what we believe to be all the information you may need to understand the processing of your personal data by us and our affiliates. We will keep this information regularly up-to-date, and the latest version of this privacy notice will always be available here: [<https://www.mufig-investorservices.com/mibl/>] We will notify you of any substantial changes to the privacy notice through the usual contact methods you provided to the funds when you entered into a contractual relationship with them (in most cases, via e-mail).

However, should you require any additional information in relation to such processing, please feel free to contact our “Data Protection Officer” as provided in point 0.

8. HOW DO WE KEEP YOUR PERSONAL DATA SAFE?

We have implemented technical and organisational measures in line with best industry practice to keep your personal data safe. We employ a range of prevention and detection tools and methods to safeguard against the loss, misuse, or alteration of any information in our control and the availability of the services we provide. We are continuously improving our information security posture.

All staff completes data protection training/ security awareness training annually. In addition, targeted training and awareness exercises are provided from time to time. MIBL perform Data quality check, phishing campaign, Penetration testing to keep Information and Data safer.

9. WHICH RIGHTS DO YOU HAVE?

You have the right to:

- access any personal data concerning you and request a copy of such data;
- rectify or delete any incorrect personal data concerning you;
- restrict or object to the processing of personal data concerning you;
- receive personal data concerning you or to transmit those personal data to another controller in accordance with data protection law (right to data portability);
- obtain a copy of or access the appropriate or suitable safeguards which have been implemented for transferring the personal data outside of the EEA, in compliance with data protection law;
- object, at any time, on request and free of charge, to the processing of your personal data carried out based on our legitimate interests.

You may exercise any of the above rights by contacting us as provided under clause 0.

10. HOW CAN YOU CONTACT US?

You can contact us to address your requests for information or to exercise your rights.

You can contact our Data Protection Officer by post to the attention of the "Data Protection Officer" at:

287-289, Route d'Arlon,
L-1150 Luxembourg,
Grand-Duchy of Luxembourg

or via email at dataprotectionoffice@lu.tr.mufg.jp.

If you want to formulate a complaint related to the processing of your personal data under this privacy notice, such complaint should also be addressed to the Data Protection Officer.

In any event, you may address at any time a complaint to the competent supervisory authority – in Luxembourg, the Commission Nationale pour la Protection des Données ("CNPD") - in case of infringement of your rights or GDPR provisions.

Further details on the complaint process can be found at <https://cnpd.public.lu/en/droits/faire-valoir/formulaire-plainte.html>.