

Clients and Suppliers Data Privacy Policy

Data Privacy Policy issued by Societe Generale Securities Services, SGSS (Ireland) Limited

Societe Generale Securities Services, SGSS (Ireland) Ltd is an Irish based subsidiary of Société Générale S.A, a bank incorporated under the laws of France. Societe Generale Securities Services, SGSS (Ireland) Ltd is hereafter referred to as SGSS Ireland. In the course of its business activities SGSS Ireland is in contact with clients, with fund investors and with suppliers. SGSS Ireland provides "Securities Services" in the meaning detailed at the end of the following paragraph.

Pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council dated 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereafter referred to as the "Regulation" or as "GDPR"),. In the present policy, reference to the "Data Privacy Policy" refers to this document (including its appendix) and other words starting with capital letters shall have the same meaning as in GDPR. SGSS Ireland issues the present Data Privacy Policy with a view to inform its suppliers as well as its clients (particularly asset management companies, investment companies, UCITS/AIFs) that it acts as Data Controller in the provision of its "Securities Services". Such services exclusively consist in transfer agency services and fund administration services provided to UCITS and AIF on behalf of their management companies.

Due to the type of services provided, Personal Data,, as defined below can be directly or indirectly provided by Data Subjects to SGSS Ireland. When such Personal Data are being provided by Data Subjects to SGSS Ireland's clients, such clients provide the necessary and relevant data to SGSS Ireland with a view to allow SGSS Ireland to provide them with the securities services mentioned above.

Accordingly, SGSS Ireland has implemented this Data Privacy Policy for natural persons who have indirect relations with SGSS Ireland (i.e relations with SGSS Ireland clients). It also applies to natural persons who have direct relations with SGSS Ireland.

In accordance with the Regulation, SGSS Ireland in its role as Data Controller, provides Data Subjects with the following information.

Source of personal data

The Personal Data held by SGSS Ireland are collected from third parties, namely, clients of SGSS Ireland (in particular, asset management companies, investment companies, UCITS and AIFs) and fund investors with whom the concerned Data Subjects have a relationship. The abovementioned third parties transfer the data (or request their transfer) to SGSS Ireland for the performance of its "securities services".

Categories of personal data processed

The term "Personal Data" , as stated in GDPR, means any type of information, identified or identifiable, relating to a Data Subject. The Data Subject's Personal Data processed by SGSS Ireland. are those collected from the source described above and could include the name, surname, nationality, contacts (including address, phone number and email address), date and place of birth, civil status, economic and financial information,

details of identification documents. SGSS Ireland does not process special categories of Personal Data (i.e. special categories of Personal Data is information revealing the ethnic or racial origin of the Data Subject, his/her political opinions, religious or philosophical beliefs or trade union membership, as well as genetic data, biometric data aimed at uniquely identifying a natural person, data regarding health or sexual life and sexual orientation of the person). However, should SGSS Ireland ever collect or process special categories of Personal Data in order to achieve the purposes indicated below, SGSS Ireland will always process this data in compliance with the provisions of the applicable laws and regulations, in particular GDPR, and with the requirements indicated in this Data Protection Policy. Further details about Data processing are provided in Appendix 1.

Purpose of the processing for which the data are intended. Mandatory and optional nature of the data provision

The processing of the data indicated above is carried out in compliance with the Regulation and with the principles and obligations of confidentiality and privacy with which SGSS Ireland (as a subsidiary of Société Générale S.A.) abides by.

The Personal Data is processed for the following purposes:

1. Purposes closely related and essential to services provided by SGSS Ireland acting as transfer agent and fund administrator of AIF and UCITS funds. The provision of Personal Data necessary for such purposes may not be mandatory from a legal perspective, however the refusal to provide it may result in the impossibility for SGSS Ireland to provide the service (s). Such processing does not require the consent of the Data Subject;
2. Purposes connected to the obligations laid down by laws, regulations and directives issued by the Supervising Authority and Supervisory Bodies of the financial system. The provision of Personal Data necessary for these purposes is mandatory and the processing does not require the consent of the Data Subject.

The Data Subject's Personal Data collected for the above mentioned purposes is not used by SGSS Ireland or Société Générale Group for marketing, commercial or promotional purposes.

Categories of recipients to whom the personal data are disclosed

In order to carry out some of its activities, SGSS Ireland may outsource services to companies belonging to the Société Générale Group but also to third parties, which fall into the following categories:

- companies providing banking, financial and insurance services;
- entities who offer services for the acquisition, registration and processing of data deriving from documents and media provided or originating from the Data Subjects. Such services are characterized by bulk data processing;
- entities who carry out activities of printing, transfer, enveloping, transport and sorting of communications to the Data Subjects;
- entities who carry out activities of archiving the documentation relative to the relations with the Data Subjects;
- entities providing hardware outsourcing and data processing services.

The Personal Data collected may also be communicated to the competent Authorities of European or Non-European countries to provide answers to their requests in accordance with the regulation applicable time by time, in particular referring to the prevention of money laundering and terrorist financing.

Transfer of personal data outside the European Economic Area

Given the international presence of the Société Générale Group, and in order to optimise the quality of the services provided, SGSS Ireland may have to transfer Personal Data collected to countries outside the European Economic Area, whose legal provisions on the protection of Personal Data are different from those of the European Union.

Retention of Personal Data

In this case, protection of Personal Data pursuant to the Regulation is ensured by signing Standard Contract Clauses or other protection tools defined by law. SGSS Ireland keeps Personal Data for a maximum period of 10 (ten) years, starting from the termination of the contractual relationship with its clients, without prejudice to the provisions of Article.17 of the Regulation.

Exercising the personal data access right and other rights

In relation to the personal data provided, the Data Subject can exercise the following rights guaranteed by the Regulation:

- a) access right;
- b) right to rectification, modification and cancellation of personal data or the right of restriction of;
- c) the processing of the former;
- d) right to object the processing;
- e) right to withdraw the consent
- f) right to send a complaint to the competent Supervisory Authority

The right to portability of the data cannot be exercised, when the data are not collected directly by SGSS Ireland, and the latter processes them on the basis of a contract with its clients and not with the Data Subject concerned.

Data Subjects can exercise any of the above mentioned rights from point a) to point e) sending a written communication to :

SGSS Ireland acting as Data Controller using the following e-mail address:
dataprotection.sgssireland@sgss.socgen.com

Or to SGSS Ireland's Data protection officer (DPO) using the following e-mail address:
dpo.sgssireland@sgss.socgen.com

As stated in f) above Individuals concerned can also lodge complaints about processing of their personal data with the Data Protection Authority whose address is:

Data Protection Commission,
Canal House, Station Road,
Portarlinton,
Co. Laois, R32 AP23,
Ireland.

APPENDIX I LIST OF PERSONAL DATA PROCESSING

Processing purpose	Additional information relating to processing purpose	Categories of personal data	Legal basis for processing	Data Retention
KYC/AML/Fraud prevention/criminal offences	Participating in the prevention and detection of fraud and related crimes, producing statistics, management information and executing tests, complying with antimoney laundering, terrorism and related legislation and complying with other legal and regulatory obligations.	Board members and main directors, shareholders data. <ul style="list-style-type: none"> • Identification (such as passport). • Private life (such as family members names) • Professional life (such as job title) • Financial data • Prevention and incident management (such as public legal suites) 	Compliance with a legal obligation	For Legal and regulatory requirements Personal Data will only be kept for as long as necessary to comply with applicable laws, unless there is an ongoing legal investigation.
Financial management	Own accounting, performance monitoring, solvency and treasury management	Mainly counterparts data while executing deals for hedging : <ul style="list-style-type: none"> • Identification (such as name) • Professional life (such as prof e- mail address) 	Compliance with a legal obligation Legitimate interest	For management of banking relationship, personal data are stored during the contractual relationship and for further periods in compliance with local regulatory requirements
Client onboarding	During this phase we gather and store what is necessary for services provisions	Operational contacts categories of data: <ul style="list-style-type: none"> • Identification (such as name) • Professional life (such as prof e- mail, prof mobile phone number, contractual scope of accountability) • Depending upon the services we may collect personal data from final investors and shareholders: <ul style="list-style-type: none"> • Identification • Operations and services execution (such as bank account) • Contractual relationship (such as contract number) 	Compliance with a legal obligation Legitimate interest	For management of banking relationship, personal data will be kept during the contractual relationship and for further periods in compliance with local regulatory requirements

Processing purpose	Additional information relating to processing purpose	Categories of personal data	Legal basis for processing	Data Retention
Securities Services provision	While executing the contracts with our clients, we often need to store and handle data in addition to the basic data collected during the on-boarding phase	Depending upon the services we may collect personal data from final investors and holders: <ul style="list-style-type: none"> • Identification • Operations and services execution (such as bank account) • Contractual relationship (such as contract number) 	Contracts execution for clients Legitimate interest	For management of banking relationship, personal data will be kept during the contractual relationship and for further periods in compliance with local regulatory requirements
Payment services Provision	While executing the contracts with our clients, we often need to store and handle data in addition to the basic data collected during the on-boarding phase. Such data may deal with final beneficiaries	Depending upon the services we may gather: <ul style="list-style-type: none"> • Identification • Operations and services execution (such as smart card number) • Contractual relationship (such as contract number) 	Contracts execution for clients Legitimate interest	Personal data will be kept during the contractual relationship and, if applicable, for further periods in compliance with local regulatory requirements
Open Web sites servicing	Our Group websites help a prospect, client, candidate to better know our offers, locations and distributes our public communication (such as our data policy)..	Relevant websites' data privacy policies depict categories of data	Contract execution Legal obligation Legitimate interest	Data retention periods in relevant website privacy policy