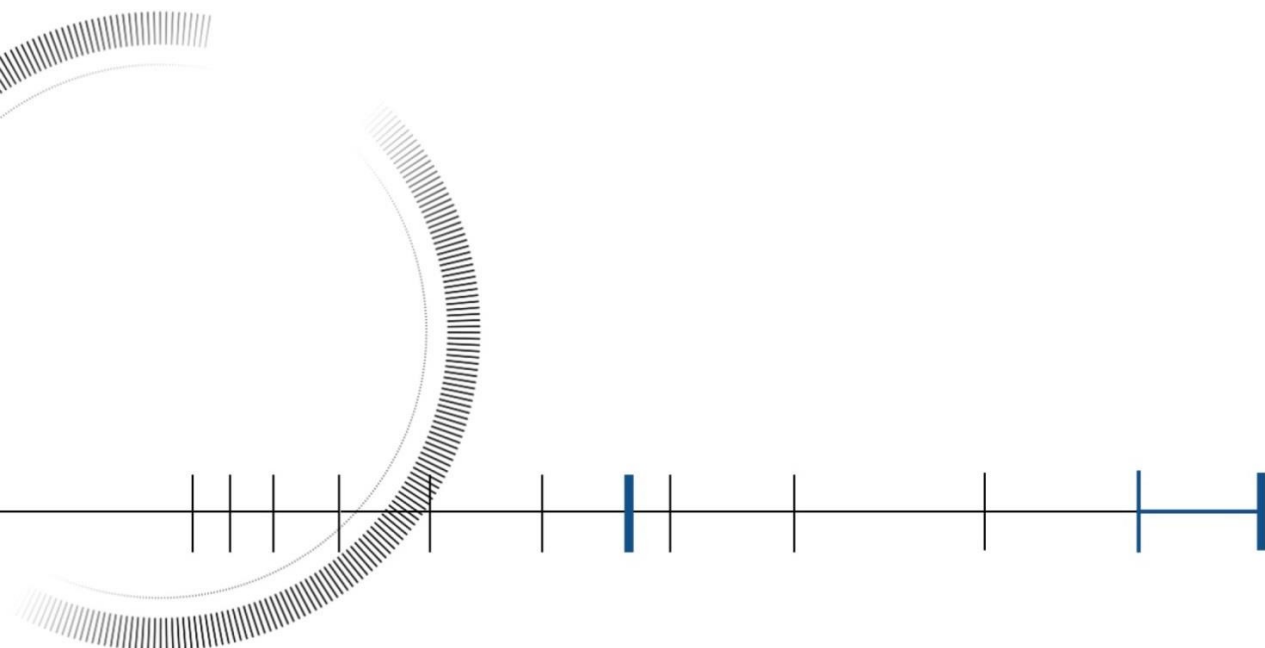


# Data Privacy Notice



### 1. Who is in charge of your personal data and whom can you contact?

We process the information and personal data regarding you and/or regarding any person related to you (the Related Person/s and yourself, collectively hereinafter the "Related Person/s"). Simply put, we undertake this processing as part of existing Business Relationships and/or relationships with potential clients, including your use of our websites (hereinafter collectively the "Business Relationship"). We may do so either as a Data Controller, or as a joint data controller (hereinafter the "Data Controller").

A "Related Person" is a person or an entity on whom you yourself or a third party provides us with information and/or of which we have knowledge through another channel of our Business Relationship. A Related Person may, for example, be – (i) a company director, CEO or employee; (ii) a trustee, settlor or protector of a trust, (iii) a fiduciary nominee or effective heir of an account; (iv) a holder of substantial interests in an account; (v) a person exercising effective control; (vi) the beneficiary of a specific payment; or (vii) any representative or agent (e.g., a person holding power-of-attorney or a right of access to information on an account).

In light of the above, we ask you to contact all persons related to you and to send them this Data Privacy Notice (hereinafter "Privacy Notice"), as well as the information that it contains.

For any question regarding this Privacy Notice, your Data Controller or, more generally, the processing of your personal data (or the data of Related Persons), feel free to contact your account manager at OFI or our Data Controller at one of the following addresses:

**The OFI  
Group**  
22, rue Vernier  
75017 Paris,  
FRANCE

**Data Controller**  
Isabelle HABASQUE  
[lhabsque@ofi-am.fr](mailto:lhabsque@ofi-am.fr)

### 2. How do we process your personal data?

We are subject to certain obligations of confidentiality and/or secrecy, pertaining, for example, to data protection, contracts, professional secrecy or banking secrecy. The personal data that we process are also subject to said obligations.

This Privacy Notice describes how we process personal data (i.e., how we compile, use, retain, transmit, handle or process them in any manner whatsoever, operations collectively referred to hereinafter as "Processing" or "Processing Operations"). This Privacy Notice does not replace our contractual terms and conditions applicable to it. All our Processing Operations are listed in the processing register of the OFI Group, in accordance with the regulatory obligation of the General Data Protection Regulation.

We may conduct our Processing Operations directly or indirectly, in calling on third parties who process personal data on our behalf (hereinafter: the "Subcontractors"). We are responsible for Processing of personal data only within the parameters of this Privacy Notice.

### 3. What personal data do we process?

"Personal data" includes any information for identifying an individual person directly (for example, first or last name) or indirectly (for example, passport number or a combination of data).

The personal data of persons concerned that we process may include:

- identification data, for example, last name, address, telephone number, email address, or professional details;
- personal details, for example, birthdate and country of birth;
- professional information, for example, jobs held and career background, job title and signatory powers;
- identity documents issued by public bodies, for example, passport, official ID card, tax identification number, national insurance number and social security number;
- financial information, for example, financial and credit history and banking details;
- data pertaining to transactions or investments, for example, current and past investments, investment profile, investment preferences and amount invested, number and value of shares owned, role in a transaction (e.g., seller or buyer of shares) and transaction details;
- information transmitted, for example, by cookies and similar technologies on websites and emails.

### 4. To what end and on what legal bases do we process personal data?

We compile and process personal data for the purposes (hereinafter the "Purposes"), and based on the legal bases, mentioned in this document.

Generally speaking, we base our Processing on: (i) executing a contract to which you are a party or that involves a Related Person (including for executing precontractual measures at your request or at the request of a Related Person); (ii) meeting our obligation to comply with legal or regulatory provisions; (iii) pursuing our legitimate interests; and (iv) executing a public-service mission.

More specifically, we compile and process personal data that is necessary for executing a contract to which you are a party and/or that involves a Related Person. This includes the following Processing Operations (which may also be have other legal bases):

- Opening and holding your account and/or the account of a Related Person, or the start of a Business Relationship with us, including all formalities for identifying you;
- any other related service supplied by a service provider of the Data Controller/s and Subcontractors as part of the Business Relationship;
- investment fund management, administration and distribution, including all ancillary services related to these activities, or
- processing of subscription, conversion and redemption requests for investment funds, as well as managing ongoing relationships covering assets held in said investment funds.

We also compile and process personal data in order to comply with legal and regulatory obligations to which we are bound, and, in particular, in order:

- to provide documentation on an offering of products and services to the persons concerned;
- to comply with legal accounting obligations and to ensure compliance with market legislation covering financial instruments;
- to conduct any other form of cooperation with the relevant administrative bodies, supervisory authorities, police authorities or any other public authorities (for example, in the areas of anti-money laundering and anti-financing or terrorism (AML-ATF) measures) or to report to them in order to prevent and detect tax fraud (for example, in disclosing names, addresses, birthdates, Tax Identification Numbers (TIN), account numbers, and account balances to the tax authorities under the Common Reporting Standard (CRS) or the Foreign Account Tax Compliance Act (FATCA) or any other current tax provision aiming to prevent tax evasion and tax fraud);
- to prevent fraud, subornation, corruption and supply of financial and other services to persons subject to ongoing economic or commercial sanctions, in accordance with our AML-CTF procedures, and to keep on file AML-CTF and other reports for detection purposes;
- to record conversations with persons concerned (for example, telephone calls and emails), in particular in order to document instructions or to detect potential or real fraud and other infractions.

Meanwhile, we may process personal data in the pursuit of our legitimate interests, in order:

- to assess certain traits of persons concerned on the basis of personal data processed automatically;
- to develop our Business Relationship with you;
- to enhance our internal commercial organisational set-up and our operating activities, particularly in the area of risk management;
- to use such information within the OFI Group for market study or advertising reasons, as long as the persons concerned are not opposed to the use of their personal data for promotional purposes;
- to assert, exercise and/or defend real or potential rights in judicial proceedings, investigations or similar procedures;
- to record conversations with persons concerned (for example, telephone calls or emails) in order to verify instructions and to implement them or to defend our interests or rights; to assess, analyse and enhance the quality of our services; and to train our employees and manage risks.

If one or more of our personal data Processing Operations requires your prior consent, we will ask you for it in timely fashion.

Supplying personal data may be mandatory, for example, to comply with the legal and regulatory obligations incumbent upon us. Please note that failing to provide such information could prevent us from continuing a Business Relationship with you and/or providing you services.

### 5. Do we use profiling or automated decision making?

We may assess certain characteristics of persons concerned on the basis of automatically profiled personal data, in particular, to submit to them personalised offers and advice or information on our products and services or on the products and services of our affiliates and business partners. We may also use technologies allowing us to identify the level of risks of a person concerned or of activity on an account.

However, we do not generally use automated decision-making regarding a Business Relationship and/or persons concerned. When we so, we comply with applicable legal and regulatory requirements.

### 6. What sources do we use in compiling your personal data?

To achieve the Purposes, we compile or receive personal data:

- directly from the persons concerned, for example, when they contact us or through (pre)contractual documentation that is sent to us directly; and/or
- indirectly via other, external sources, in particular publicly accessible sources (for example, lists of sanctions of the United Nations (UN) or the European Union (EU), information available from subscription services (for example, Bloomberg) or information provided by third-parties.

### 7. Do we share your personal data with third parties?

If necessary or useful for achieving the Purposes, we reserve the right to disclose or make available personal data to the following recipients, as long as such is legally or otherwise authorised or required:

- Public/governmental administrative bodies, courts, relevant authorities (for example, financial surveillance authorities) or financial market actors (for example, third-party or central depositories, brokers, exchanges and registrars);
- Entities of the OFI Group or third-party Subcontractors who process personal data on our behalf and/or to whom we outsource some of our tasks;
- Auditors or legal advisors.

We pledge not to transfer personal data to third-parties other than the aforementioned ones except in one-off cases duly reported to the persons concerned or when required to do so by current obligations, or by virtue of a ruling by a court or a governmental, surveillance or regulatory body, in particular tax authorities.

### 8. Are personal data transferred outside our jurisdiction?

As part of the Business Relationship, we may disclose, transfer or store personal data outside France (hereinafter "International Transfer"): (i) for the purpose of concluding or executing contracts dealing directly or indirectly with the Business Relationship, for example, a contract with you or with third-parties acting in your interest; (ii) when communication is necessary to protect a higher public interest; or (iii) in exceptional cases that are duly covered by applicable laws (for example, disclosing certain securities market transactions to international commercial registers).

International Transfers may include a transfer to jurisdictions that: (i) guarantee an adequate level of protection of the rights and freedoms of the persons concerned regarding data processing; (ii) have been officially ruled to have an adequate level of data protection (e.g., through equivalence rulings by the European Commission or the Swiss Federal Data Protection and Information Commissioner); or (iii) have not been ruled as such and that do not offer an adequate level of data protection. In this last case, we shall ensure that appropriate guarantees are provided, for example, through typical contractual clauses covering data protection established by the European Commission.

If you want to obtain additional information on International Transfers or suitable guarantees, you may contact our Data Controller (see section 1 above).

### 9. What are your rights in data protection?

Subject to local data protection legislation, you are entitled:

- to request access to personal data that we hold and to receive a copy of it;
- where applicable, to request rectification or deletion of inaccurate personal data;
- to request the deletion of personal data when processing of it is no longer necessary for achieving the

## Data Privacy Notice

Purposes, or that, for other reasons, is no longer legally required, subject, however, to applicable keeping times (cf. section 10 below);

- to request restriction of Processing of personal data accuracy of which is contested, if processing is not legally required or if the persons concerned oppose Processing of such;
- to oppose Processing of personal data, in which case we will no longer process your personal data, unless we have overriding and legitimate reasons to do so (for example, for asserting, exercising or defending a right in a judicial proceeding);
- to receive personal data in a structured, commonly used and machine-readable format (right of data portability);
- to obtain a copy of the appropriate or adequate guarantees that we may have put into place in order to transfer personal data outside of the European Union or Switzerland, or to have access to such;
- to file a claim with our Data Controller (cf. section 1 above) pertaining to the Processing of personal data and, barring a satisfactory resolution of the claim, to file a claim pertaining to the Processing of such data with the relevant data protection authority.

Even if a person concerned opposes Processing of his/her personal data, we are authorised to continue to process it if such is: (i) legally required; (ii) necessary for executing the contract to which the Person concerned is a party; (iii) necessary for executing a mission conducted in the public interest; or (iv) necessary to pursuing our legitimate interests, including asserting, exercising or defending a right in a judicial proceeding. However, we will refrain from using the personal data of the person concerned for direct marketing purposes if the person concerned asks us not to do so.

Subject to the restrictions provided in this document and/or local legal provisions on data protection, you may exercise the aforementioned rights without cost by contacting our Data Controller.

### 10. How long are your personal data kept or archived?

As a rule, we retain personal data for as long as we need it to achieve the Purposes. Likewise, we delete or anonymise personal data (or take equivalent measures) when such data are no longer necessary for achieving the Purposes, subject to: (i) applicable legal or regulatory requirements on retaining personal data for a longer period of time; or (ii) asserting, exercising and/or defending real or potential rights in judicial proceedings, investigations or similar procedures, including legal holds that we may impose to retain relevant information.