

Privacy Statement

September 2023

ABN AMRO Investment Solutions takes great care in managing and protecting your personal data.

This document describes how we collect, use, process and send your personal information

Please take the time to read this document. If you have any questions, you can contact your contact person at ABN AMRO Investment Solutions or our Privacy Officer, whose contact details can be found in section 3 "Contact information".

1. Data controller :

This document has been prepared by ABN AMRO Investment Solutions, 119 -121 boulevard Haussmann, 75008 Paris, acting as the controller of your personal data. ABN AMRO Investment Solutions is an entity of the Dutch ABN AMRO GROUP NV.

For the purposes of this document, the terms "we" or "us" or "our" or "AAIS" refer to ABN AMRO Investment Solutions.

2. The persons concerned by this privacy statement :

This document is meant for any natural person with a direct or indirect contact with ABN AMRO Investment Solutions, including (non-exhaustive list):

- Clients
- Prospects
- Persons contacting AAIS
- Directors, managers, representatives, contact persons of a legal entity that may be a client, partner or service provider of AAIS
- Beneficial owners, shareholders or employees of a legal entity that is a client of AAIS
- Persons involved in the management of a fund: managers, middle and back office managers
- Persons with an advisory role (e.g. lawyers) in contact with AAIS

For the purposes of this document, the terms "you", "your" and "yours" refer to the persons mentioned above.

3. Contact information :

A Data Protection Officer (DPO) has been appointed for all legal entities of the ABN AMRO Group. He is based at ABN AMRO's head office in Amsterdam, the Netherlands. The DPO is supported by an international team of data protection correspondents.

You can contact our privacy officer by writing an email to NOBC.INFORMATIONDROITDACCES@fr.abnamro.com or by sending a letter by post to the following address :

ABN AMRO Investment Solutions
Compliance department – Privacy Officer
119 -121 boulevard Haussmann
75008 Paris
France

If you wish to contact the ABN AMRO Group's Data Protection Officer directly, you can send an e-mail to privacy.office@nl.abnamro.com or send a letter by post to the following address :

ABN AMRO Privacy Office
Gustav Mahlerlaan 10
PO Box 283, (PAC : HQ1161)
1000 EA, Amsterdam
Netherlands

4. The personal data we collect :

Personal data is any information relating directly or indirectly to an identified or identifiable natural person.

AAIS collects, uses and retains the following categories of personal data :

- **identification and contact data:** e.g. gender, first and last name, tax, postal and e-mail addresses, telephone number, age, date and place of birth, nationality, copy of passport or identity card.
- **economic, financial, tax and bank information:** e.g. income, tax ID, tax status, country of residence, amount of assets, origin of assets, investor profile.
- **professional information:** e.g. professional experience, diplomas, curriculum vitae.
- **data generated in the context of physical or remote exchanges :** for example, minutes of meetings, letters and e-mails, telephone conversations.
- **data generated by the use of our services:** for example data generated by cookies on our website.

AAIS does not process special categories of personal data or so-called sensitive data such as data that reveal your racial or ethnic origin, political opinions, trade union membership, religious or philosophical beliefs, genetic and biometric data, data concerning your health, your life or your sexual orientation, unless we are required to do so by law.

5. Personal data sources :

We collect personal data directly from the natural persons mentioned in the second paragraph of this privacy statement.

We also collect personal data indirectly from third party sources, for example :

- **our service providers and partners** who provide us with the personal data of their employees for the management of professional and/or commercial relationships or for the due diligence carried out on management companies or funds;

- **Other ABN AMRO Group entities** that transfer personal data to us, for example, to comply with our anti-money laundering obligations or in connection with a business proposal;
- **publications and databases** made available by authorities or official third parties such as the *Journal Officiel*, the Companies Register, etc., in order to meet our regulatory obligations regarding customer knowledge;
- **public sources** such as paper media or websites. This information is collected in order to comply with our anti-money laundering and anti-terrorist financing obligations and to comply with regulations relating to international sanctions and embargoes.

6. The purposes and legal grounds of data processing:

We shall not collect, use or retain your personal data without a previously determined legal ground and purpose (i.e. objective).

Depending on the processing, we can rely on one of the following legal grounds for our data processing activities : **contract, legal or regulatory obligation, legitimate interest or consent.**

6.1. Performance of a contract, including the pre-contractual phase:

We use your personal data for the conclusion and performance of our contract(s) with you and to manage our business relationship :

- Portfolio management
- administration and distribution of investment funds,
- processing of subscriptions and redemptions within investment funds.

If you refuse to provide us with this data, we will not be able to enter into or continue our contractual relationship. Also, we cannot delete your personal data from our systems when they are necessary for the performance of the contract.

6.2. Compliance with a legal obligation :

In order to comply with our legal obligations, we need to collect, analyse, store and sometimes communicate your personal data. We process your personal data for the following main purposes :

- **Prevention and detection of money laundering and terrorist financing** : identity and information checks with international sanctions lists, monitor our clients' transactions, identify unusual or suspicious transactions.
- **Recording of telephone conversations**: monitor the regularity of financial investment transactions and their compliance with the client's instructions
- **Complaints management**: record and respond to customer complaints, respond to requests from the Ombudsman.
- **Identification, prevention and management of conflicts of interest** : record (potential) conflicts of interest.

- **Management of data access requests** : record, analyse and respond to data access requests.

You cannot object to the use of your personal data by AAIS for the above-mentioned processing operations, which are necessary for us to fulfil our legal obligations.

6.3. Legitimate interests pursued by AAIS :

We use your personal data for our legitimate interests, except when our interests are overridden by your interests, fundamental rights and freedoms. Where we process your data on the basis of legitimate interest, you have the right to object to the processing.

We collect and use your personal data for the following main purposes :

- **The development of our commercial activity** : carry out marketing activities towards institutional clients and to make contact with the natural persons representing them
- **Due diligence on the management and operational procedures of a management company or fund**: conducting analyses to select the best companies and managers for our funds

6.4. Prior consent :

We ask for your consent for the use of advertising or audience measurement cookies on our websites. For more details on the cookies that are used, you can consult the policy available on our website, in the cookies section or via this link <https://www.abnamroinvestmentsolutions.com/fr/bas-de-page/cookies.html>.

Your consent is freely given and can be withdrawn at any time.

7. Your personal data and the ABN AMRO Group :

AAIS is part of the Dutch ABN AMRO GROUP N.V. Personal data may be transferred to our group companies, in compliance with our legal obligations and within the limits of the tasks entrusted to them.

ABN AMRO provides us with platforms and tools for transaction processing, risk management, including operational risk, anti-money laundering and terrorist financing, IT security.

8. Recipients of personal data :

In order to achieve the purposes set out in this privacy statement, it is necessary to transfer your data to third parties (other than ABN AMRO Group entities) listed below :

8.1. Third parties acting on our instructions (processors) :

We communicate your personal data to IT service providers, printing service providers, telecommunication companies, archiving service providers and IT maintenance providers.

These third parties need your personal data to perform and deliver the services we buy from them. They have the status of **personal data processors**.

Data processing and outsourcing of our services are subject to specific rules. We choose our service providers with the utmost care and we make sure that our data processing agreements contain clauses to ensure the security and confidentiality of the data that is processed. We remain fully responsible of the data processing, even if we use these third parties.

8.2. Third parties acting on their own behalf:

We transfer your personal data to third parties who act on their own behalf. They are themselves data controller and therefore responsible for the use of your data. They are subject to the same data protection obligations as AAIS :

- **Professional or non-professional investors, clients or prospects:** in the context of RFP's or commercial presentations, information about the managers and the management team may be communicated to these third parties.
- **Public authorities:** We can transfer your data to public authorities if we are obliged to do so in response to an official request or mandate, such as a request from the tax authorities, the Autorité des Marchés Financiers, the ombudsman, a bailiff or the judicial police.
- **Regulated professions:** Your personal data may be shared with lawyers, legal and judicial officers, administrative or judicial authorities to which a dispute has been referred or to enable AAIS to defend its rights and interests. Your data can also be shared with statutory auditors in the context of annual controls or audits.

9. Transfer of personal data outside the European Union :

Your data may be transferred outside the European Union where we use the services of a service provider or of an ABN AMRO Group entity operating in a country outside the European Union.

In the event that the country outside the European Union is not considered by the European Commission as a country offering an adequate level of data protection, the following safeguards are put in place :

- For data transfers to third-party companies : we sign **approved European Commission standard contractual clauses** with these companies and ensure that the necessary safeguards are in place to adequately protect the personal data that is transferred.
- For data transfers to other ABN AMRO Group entities : these transfers comply with our Binding Corporate Rules validated by the Data Protection Authority and available on the ABN AMRO Group website by clicking [here](#)¹.

You can obtain a copy of these safeguards by sending us a request (see section 3 "Contact Information" above).

¹ Or by following the link : <https://www.abnamro.nl/nl/priv/abnamro/privacy/binding-corporate-rules.html>

You are informed that supervisory authorities, public or investigative bodies, or other entities, located outside the European Union, may be entitled to request communication of personal data for investigations, under the conditions and within the limits provided for by the applicable rules of national and international law.

10. Profiling and personal data :

We use profiling techniques as part of our obligations to combat money laundering and terrorist financing. We pay particular attention to unusual client behavior and transactions which, by their nature, represent a higher risk of money laundering. We have an obligation to report any suspicion of money laundering to TRACFIN.

In order to carry out this monitoring, we establish a risk profile for all our clients and their representatives during the onboarding procedure and we evaluate this profile periodically. Depending on the profile and in accordance with our regulatory obligations, transactions and behavior are monitored.

11. Automated individual decision making :

We do not use automated decision-making tools or processes.

12. Security measures:

We attach great importance to the protection of your personal data. Therefore, we implement the necessary technical and organisational security measures to prevent any breach of personal data confidentiality, availability or integrity.

13. Retention periods :

AAIS retains your personal data for a period of time defined by its legal and regulatory obligations, the purposes of the data processing and the applicable statute of limitation.

In most cases, except when facing technical constraints, personal data are kept for 5 years. At the end of the retention periods, the data is deleted.

14. Your rights :

In accordance with the data protection regulation, you have the right to access your personal data. You may contact your privacy officer by writing to the following e-mail address NOBC.INFORMATIONDROITDACCES@fr.abnamro.com or by post at the following address :

ABN AMRO Investment Solutions
Compliance department – Privacy Officer
119 -121 boulevard Haussmann
75008 Paris
France

A copy of your identity document may be requested if we have reasonable doubts about your identity.

Right of access : You have the right to obtain confirmation as to whether or not your personal data is being processed and to obtain access to and a copy of that data.

Indirect right of access : This right relates to personal data collected as part of the processing implemented by AAIS to meet our anti-money laundering obligations. This access request is to be submitted to the CNIL.

Right to rectification : You may request a correction of your personal data if you believe it to be inaccurate or incomplete.

Right to erasure (right to be forgotten) : You have the right to ask us to delete your personal data. However, we may not always be able to meet your request, particularly where we are required by law to retain the data.

Right to restriction of processing : You can ask us to limit the use of your personal data. This right means that the processing of your data is restricted, so we may retain the data but may not use or process it in any other way. This right applies if you believe that your personal data is inaccurate, that we are using it unlawfully, that it is no longer useful for the purposes listed in section 6 above or where you have objected to the processing of your data.

Right to object : Where we process your personal data on the basis of our legitimate interests, you may at any time object to the processing of your personal data on grounds relating to your particular situation, unless we assert compelling legitimate grounds for processing such data which override your interests, rights and freedoms, or where such data is necessary for the establishment, exercise or defence of legal claims. You have an absolute right to object to the processing of your personal data for marketing purposes.

Right to data portability : For processing based on your consent or on the execution of a contract, you have the possibility to retrieve part of your data in electronic format or to request the transfer of the data to a third party.

We draw your attention to the security conditions in the transfer and the data processing by the recipient. You must ensure that the third party is trustworthy and offers you an adequate level of security for your personal data.

The right to determine what happens to your personal data after your death : You have the right to define general and specific directives relating to the retention, deletion and communication of your personal data after your death. Any special instructions you may give will be recorded by AAIS, and you may change or revoke them at any time. Please note that this right is subject to the publication of the applicable regulatory texts.

Right to retrieve your consent : For the processing of personal data for which you have given your consent, you have the right to withdraw that consent at any time.

Right to complain : If you have a complaint about the processing of your personal data, you can contact your privacy officer.

You may also file a complaint about the processing of your personal data with the Commission Nationale Informatique et Libertés (CNIL), 3 place de Fontenoy 75007 Paris or on www.cnil.fr.