

Personal data protection notice

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

This document describes how we collect, use, process and send your personal information (or “*personal data*” under the personal data protection act) when you use our products and services as well as our internet sites.

Please take the time to read this document. If you have any questions, please get in touch with your usual contact at ABN AMRO Investment Solutions or with your Neuflyze OBC Group¹ personal data officer at this email address NOBC.INFORMATIONDROITDACCES@fr.abnamro.com or at the following postal address: Banque Neuflyze OBC, Data protection officer, 3 avenue Hoche, 75008 Paris.

Our use of personal data may change for regulatory reasons or following a change in our product and service offer. If so, this document will be adapted to reflect these changes and you will be kept informed.

In this document “we” or “our” or “AAIS” refers to ABN AMRO Investment Solutions.

People concerned

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
- A person contacting AAIS
- A service provider's contact
- A board director or executive representing a legal entity (whether client or service provider)
- People with advisory roles (e.g. lawyers)
- Beneficial owners (UBOs), shareholders or employees of a legal entity which is an AAIS client.

In all these cases, we may use, or be likely to use, your personal information. If you are **on** this list, please read this document carefully.

¹ ABN AMRO Investment Solutions is part of the Neuflyze OBC group.

Data Protection Officer

Mr Frank J Mulder is the data protection officer for all ABN AMRO Group legal entities² and works from ABN AMRO's head office in Amsterdam, The Netherlands. He is backed up by an international network of data protection liaison officers.

You may email the Neuflyze OBC's data protection liaison officer at NOBC.INFORMATIONDROITDACCES@fr.abnamro.com or by post Banque Neuflyze OBC, Data protection officer, 3 avenue Hoche, 75008 Paris and attaching a copy of an official identity document.

If you wish to contact the ABN AMRO Group's data protection officer, you can email him at privacy.office@nl.abnamro.com or write to ABN AMRO, Privacy Office, Gustav Mahlerlaan 10, PO Box 283, (PAC: HQ1161), 1000 EA, Amsterdam, The Netherlands.

Personal data definition

Personal data is any information that concerns an identified or identifiable natural person such as surname and first name, postal or electronic address, age, date of birth and sex, but also bank account number, land line or mobile phone number, IP address, voice or social security number.

Use of so-called sensitive data is strictly regulated and covers areas like data on healthcare, offences and criminal convictions, sexuality, political views and religious beliefs. We can only use such sensitive data in very specific cases subject to prevailing regulations and with your express approval. In conducting its business, AAIS does not collect the so-called sensitive data information category.

Data transmitted by third parties

We may use personal data which has been collected directly from you or through a third party, e.g. public sources like newspapers, internet and accessible social network areas as part of the fight against fraud, money laundering and the funding of terrorism.

Legal bases for personal data collection and use.

We are authorised to collect and use your personal data in the following cases:

Contract conclusion and execution

We use your personal data to conclude and execute a contract which you have entered into and/or which concerns a related party, and which covers areas like portfolio management, investment fund advisory, administration and distribution and management of subscriptions/redemptions in investment funds.

If providing personal data is a legal obligation, or needed to subscribe and execute contracts with you, any refusal on your part to provide us with these data will prevent us establishing a contractual relationship with you.

Should we require further data during the contract's execution, we may be obliged to terminate the contract if you refuse to comply.

² ABN AMRO Investment Solutions is an affiliate of Banque Neuflyze OBC which is an affiliate of ABN AMRO NV and part of Holland's ABN AMRO Group.

Throughout the life of any contract between you and us, we cannot delete any of your personal data which are required for the execution of the contract you have signed, or which constitute a regulatory obligation for our firm.

Legal obligation

We may have a legal obligation to collect and process your personal data. We have, for example, a duty of care. In some cases, we are legally bound to have the strongest possible grasp of our clients' financial situation so that we can take any changes into account. We may need you, for example, to provide us with details on any changes in your situation and on any transactions which strike us as unusual, whether procedures or amounts, or which appear exceptional compared to your previous dealings.

We may also need to record phone conversations as part of our commercial relationship, or market transactions conducted with external counterparties.

We also have to take steps to fight against fraud, tax evasion, funding of terrorism and money laundering. To comply with these legal obligations, we must, for example, check your identity and keep of a copy of the proof, or ensure that your transactions comply with the information provided when the business relationship was started and that such information is regularly updated.

AAIS or third-party legitimate interests

We may also use your personal data when to do so is in our legitimate interests. When we invoke our legitimate interests to collect and use your personal data, we must ensure that our legitimate interests do not infringe your own legitimate interests, your freedoms or your fundamental rights. We only proceed when we are sure that your interests, rights and freedoms are not jeopardised by our legitimate interests.

When there is a risk that your rights and freedoms might be infringed, we do not use your personal data, unless we have other legal grounds to do so, for example in the conclusion and execution of a contract or for consent.

In some cases, we have a legitimate interest in using your personal data. Examples are:

- sales proposals;
- proof of transactions or operations;
- prevention of fraud and abuse.

When we use your personal data for reasons of legitimate interest, you are entitled to oppose the procedure.

Consent

As a general rule, we use your personal data because they are necessary within the scope of the contractual relationship that we have agreed or will agree with you, or by legal obligation, or because or it is in our legitimate interests or those of a third party. In these precise cases, we do not ask for you consent.

In other cases, your consent is needed before your personal data is used. That is why we always recommend you should read any information on personal data use very carefully before giving your consent. It is, however, possible to withdraw your consent at any time.

We always ask for your express consent before processing sensitive data unless legal provisions require us to process this type of data, or allow us to do so, without your consent.

Purposes of data collected.

We use your personal data to offer you the best services and to ensure that our offers are as efficient and reliable as possible. We have six purposes:

Contract conclusion and execution. We need your data to **conclude** these contracts with you and then execute them.

Risk management. Your personal data is needed to detect, assess and manage risks. We conduct checks to ensure compliance with rules and to help us intervene on risk events or prevent them happening.

Improving our products and services. To offer products and services which best meet our clients' needs and interests, we use your data to analyse your requirements and those of other clients.

Security. We use your data to ensure that your assets, and those of all our clients, are secure. For example, we have introduced mechanisms against fraud and all kinds of damages, both in your interests and those of our firm and third parties.

Corporate social responsibility and legal obligations. We may have to alert the authorities to unusual transactions as part of our arrangements to fight against terrorism financing, money laundering, market abuses and fraud. The authorities may also ask us to provide information, and personal data in particular, as part of their surveys and checks. We first establish that the request is valid and legitimate before providing such information.

New purposes for existing arrangements

We may have to use your data for other purposes than those for which you had initially provided them. This new purpose must be compatible with the initial purpose of your data.

We conduct checks to see if a new use of your data is legally compatible.

- Does this new purpose have an obvious connection with the initial purpose of your data?
- Did we collect initial data directly from you or from a third party?
- What data type has been collected and are the data highly confidential?
- What consequences would a new use of your data for a different purpose have for you?
- What measures can we take to best protect your data during this new use?

Video surveillance and phone conversations

Our firm is protected by a video surveillance system. As a result, you may be filmed by one of our cameras when visiting us. Some staff land lines are recorded and so are the phone conversations you might have.

These arrangements are legal but only under certain conditions. A video surveillance installation is needed to secure people and premises. Recording phone conversations complies with a regulatory obligation. We take the utmost care over video and audio recordings. They are subject to the same rules as other personal data.

The ABN AMRO Group³ and your data

We handle your data with every care and only share such data as is necessary to offer you the best service.

Collected data may be transmitted, insofar as is required to ensure completion of the tasks for which they have been provided, to ABN AMRO Group companies and to the Neufelize OBC Group⁴ to help, for example, manage operations and to ensure IT security, the provision of specific services and products, internal administration and/or operational management or because of a legal obligation.

Group companies also have the right to send you sales proposals provided that you can ascertain that these companies really belong to our Group. This may be proved by the use of our logo or brand name or when their affiliate status is clearly indicated on their internet site or in advertisements.

Transmission to third parties

It may be necessary to transmit your data to third parties in certain situations. These third parties are persons or public bodies which help us provide service offers.

Subcontractors

We work with service providers. Subcontracting and outsourcing are subject to special rules. Subcontractors may need your personal data to provide us with their services. We take the utmost care over choosing these companies. Our subcontractor contracts feature the required clauses over compliance with data security and confidentiality during processing. We remain liable even when we use third parties.

Intermediaries

We also work with intermediaries who may market our products and services. These companies handle your personal data and are subject to data security and confidentiality as they are also responsible for this use.

State entities

State entities such as the tax authorities, courts and investigative authorities like the police, state prosecutors, courts of justice and our own supervisory authorities may ask us to provide personal data, including yours. After establishing the request's validity and legitimacy, we are bound to comply.

Investment service providers

We may, on demand and with your express consent, transmit your personal data to other investment service providers. When you transmit our data to third parties under your right to data portability, or because of other obligations, we are not liable for the use that the recipients may subsequently make of your data. Any personal data use by third parties is subject to their own personal data protection policies.

³ ABN AMRO Investment Solutions is an affiliate of Banque Neufelize OBC which is part of Holland's ABN AMRO Group.

⁴ ABN AMRO Investment Solutions is part of the Neufelize OBC group

Profiling

We use profiling as part of our procedures against money laundering, terrorism financing and fraud, and for the purposes of risk management, client acceptance and administration and marketing.

Profiling and the fight against fraud

We have anti-fraud measures in place. For example, we observe how money is fraudulently used to identify behaviours and signals that help take measures to avoid fraud in the future.

The fight against money laundering and terrorism financing

We have to be especially careful over unusual behaviour in transactions and operations that by nature carry a higher risk of money laundering. We are bound to inform TRACFIN (France's anti-money laundering agency) of any suspicions we might have. To carry out this surveillance, we establish risk profiles for all clients. Depending on the profile, more or less care is taken over transactions and behaviours.

Client and product acceptance

We may proceed with profiling when you wish to buy a product to assess if the investment solution matches your investor profile. We apply the procedure both to new and existing clients who wish to benefit from a new product or as part of a portfolio review.

The right to oppose profiling

In some cases, you may object to your data being used in profiling. We cannot always accept your request due to legal limitations like our regulatory obligations to fight against fraud and money laundering. You can always refuse profiling for direct marketing purposes by clicking on the dedicated link in each marketing document we send you.

Automated decision-making process

We do not use automated decision-making processes.

Data security

We strive to protect your personal data by optimising secure processing in our IT systems, our processes and procedures and by developing staff awareness or training.

Your data security is a priority that we are always trying to improve. We would be grateful if you could point out any security flaws that you might observe in our processes.

Data handling outside the European Union

In some cases, your data may be handled outside the EU. Insofar as most non-EU countries do not have the same degree of personal data protection, this kind of data transfer is subject to special rules.

Intra-group exchanges

AAIS may exchange personal data with other ABN AMRO Group companies even if they are located outside the EU. These exchanges are subject to ABN AMRO's Binding Corporate Rules (BCR) which have been approved by the Dutch personal data protection authority. The BCR facilitate personal data exchanges within a group and even outside the EU.

Outsourcing

We may transmit your data to other companies or entities outside the EU. In this case, the contract with the subcontractor includes standard clauses drawn up and approved by the European Commission

Data storage period

As a general rule, your data are stored at least for the time required for their stated purposes. There are other reasons why your data need to be stored:

- the General Data Protection Regulation does not stipulate a precise storage period for personal data. Some provisions in, for example, **France's** Commercial Code, Civil Code, General Tax Code, Monetary & Financial Code and Consumption Code, feature mandatory storage periods that we must comply with.
- in the case of legal proceedings, we may have to store some data so as to be able to defend our interests in court and until the statute of limitations is reached and we can no longer be implicated.

Your rights

Right of access

You have the right to receive confirmation that your personal data are, or are not, processed and to obtain access and a copy of the data when they are processed.

Right of rectification

You have the right to demand that your data be modified if you believe they are inaccurate or incomplete.

Right to deletion

In some cases, you have the right to demand deletion of your data. We cannot always accept your request, especially in cases when we are legally bound to retain data.

Right to limitations

You can ask us to limit use of your personal data when, for example, you consider the data is inaccurate, that we use it abusively or when you need it to establish, exercise or defend legal claims and when we no longer need the data.

Right to oppose

You have the right to oppose processing of your personal data. You have an absolute right to oppose your personal data being used for sales prospecting, including any associated profiling.

Right to data portability

For consent-based processing or the execution of a contract, you may recover some of your data electronically or ask for them to be transferred to a third party. We would draw your attention to security issues when transferring data and in the recipient's use of your data. You must ensure that the third party is trustworthy and that you have been offered an appropriate security level for your personal data. You must also ensure that the equipment used to read or transfer the dossier is secure.

Right to define directives on the use of your personal data after your death.

You also have the right to define general and particular directives on the preservation, deletion and communication of personal data processed by AAIS after your death, pursuant to prevailing legal and regulatory provisions. Any particular directives you may draw up will be registered by our firm and you may change or revoke them at any time.

Exercising your rights

You may exercise the rights covered in this document by emailing your personal data protection officer at NOBC.INFORMATIONDROITDACCES@fr.abnamro.com or by writing to Banque Neufelize OBC, Data protection officer, 3 avenue Hoche, 75008 Paris and attaching a copy of an official identity document.

Questions and complaints

We strive to give you the highest quality service. For more information, or if you are dissatisfied with the handling of your personal data, you may contact the Data Protection Officer, or the Complaints Department at the Neufelize OBC bank (*which acts for our account*), 3 avenue Hoche, 75008 Paris or by emailing reclamations.clients@fr.abnamro.com.

You may also submit a complaint concerning the handling of your personal data to the Commission Nationale Informatique et Libertés (CNIL) – www.cnil.fr – 3 place de Fontenoy 75007 Paris.

Processing entity

This document was drawn up by ABN AMRO Investment Solutions, 3 avenue Hoche, 75008 Paris, in its professional capacity as the entity in charge of handling your personal data.