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Data protection information in accordance with article 13 of the EU General Data Protection Regulation (“GDPR”) – for authorized representatives/agents of legal entities

This information is applicable for current and potential business partners (e.g. distributors, service providers, other suppliers) of Vontobel Asset Management (“Vontobel AM” or “we”).

Vontobel AM is committed to complying with banking secrecy and client confidentiality, as well as data protection laws and regulations, and thus to ensuring the protection and confidentiality of your Personal Data. The following information provides an overview of how we process your Personal Data and your rights under data protection laws and regulations. Which specific data are processed and how they are used depends largely on the services requested or agreed in each case. Vontobel AM processes data about individuals (“Personal Data”), mainly about employees and contractors of our business partners or suppliers.

1. Who is responsible for the data processing and who can I contact in this regard?

Within Vontobel AM the following entities, acting as independent or joint-controllers, are responsible for data processing:

Vontobel Asset Management S.A. (“VAMSA”)

1-4, rue Jean l’Aveugle
L-1148 Luxembourg

Including its branches:

Vontobel Asset Management S.A. – Milan Branch

Piazza degli Affari, 3
I - 20123 Milan

Vontobel Asset Management S.A. – Munich Branch

Leopoldstrasse 8-10
D - 80802 Munich

Vontobel Asset Management S.A. – Madrid Branch

Paseo de la Castellana, 95, Planta 18
E - 28046 Madrid

Vontobel Asset Management S.A. – London Branch

22 Sackville Street, 3rd Floor

2/7 UK - W1S 3DN London

A Data Protection Officer is appointed at Group level. At VAMSA and at each branch there is a designated internal data protection manager. If you have any queries or wish to discuss your data protection rights with us, please contact us at:

- VAMSA Head Office: Luxembourg@vontobel.com
- Milan Branch: clientrelation.it@vontobel.com
- Munich Branch: datenschutz@vescore.com
- Madrid Branch: atencionalcliente@vontobel.com
- London Branch: vontobelamlondon@vontobel.com

Vontobel Asset Management AG

Gotthardstrasse 43
CH-8022 Zürich

Vontobel Fonds Services AG

Gotthardstrasse 43
CH-8022 Zürich

Bank Vontobel AG

Gotthardstrasse 43
CH-8022 Zürich

You can also contact our corporate Data Protection Officer (“DPO”) at:

- dpo.vontobelgroup@vontobel.com

2. What source and what type of data do we process?

We process Personal Data that we receive from you in your capacity as the authorized representative/agent of a legal entity (prospective and/or existing business partner).

We process Personal Data which has been given to us by our current and/or potential clients in the context of our business relationship.

Should it be necessary for the provision of our services, we process Personal Data that we have lawfully (for example, to perform contracts or on the basis of your consent) received from other entities within the Vontobel Group (“Vontobel”) or third parties (such as private commercial databases). We also process Personal Data from publicly available sources (for example, commercial registers and registers of associations, the press and the Internet) which we lawfully obtain and are permitted to process.

Furthermore, in our business activities with authorized representatives/agents we process Personal Data (such as name, address and other contact details (telephone, e-mail address), title, date of birth, gender, nationality, marital status), partner type data (employed/self-employed), identification data (such as ID, tax ID), certification data (such as specimen signature) and contract related data.

3/7 **3. For what purpose do we process your data and on what legal basis?**
We process the aforementioned Personal Data in compliance with the provisions of the EU General Data Protection Regulation (GDPR) and the Swiss Federal Data Protection Act (FDPA):

3.1. For fulfillment of contractual obligations (Art. 6 (1) (b) GDPR; Art. 13 (2) (a) FDPA)
Data is processed in order to provide financial services in the context of performing our obligations according to our contracts with our clients or to perform pre-contractual measures that occur as part of a request. The purposes of data processing are primarily in compliance with the specific product and can include needs assessments, advice, asset management and support, as well as carrying out transactions. You can find additional details about the purposes of data processing in the relevant contract documents and terms and conditions.

3.2. For compliance with a legal obligation (Art. 6 (1) (c) GDPR) or in the public interest (Art. 6 (1) (e) GDPR; Art. 13 (1) FADP)
We are also subject to various legal obligations (globally and locally), namely, statutory requirements (such as the Collective Investment Schemes Act, Anti-Money Laundering Act, financial supervisory ordinances and circulars, tax laws, among others). Other purposes of processing include assessment of identity, anti-fraud and anti-money laundering measures, the satisfaction of tax law control and reporting obligations, as well as the assessment and management of risks.

3.3. For the purposes of safeguarding legitimate interests (Art. 6 (1) (f) GDPR; Art. 13 (1) FADP)
Where necessary, we process your data beyond the actual performance of our contractual obligations in order to safeguard the legitimate interests pursued by us or a third party, which does not unduly affect your interest or fundamental rights and freedoms. Besides the following examples, we also obtain Personal Data from publicly available sources for client acquisition purposes:

- Marketing or market and opinion research, unless you have objected to the use of your data;
- Asserting legal claims and defense in legal disputes;
- Guarantee of IT security and IT operations;
- Prevention and clarification of crimes;
- Measures for building and site security (for example, access controls);
- Measures for ensuring the right of owners of premises;
- Measures for business management and further development of services and products;
- Group risk management.

For all the data processing foreseen in points 3.1. – 3.3. the legal basis for the data processing is constituted by the necessity of carrying out a legal obligation. Therefore, in those cases it is not necessary to obtain your prior consent to process this data.

3.4. On the basis of your consent (Art. 6 (1) (a) GDPR; Art. 13 (1) FADP)
Insofar as you have consented to the processing of Personal Data for specific purposes (such as transfer of data within the Group, analysis of trading activities for marketing purposes, etc.), the

4/7 lawfulness of such processing is based on your consent. Any consent granted may be revoked at any time. This also applies to the revocation of declarations of consent that are granted to us prior to the entry into force of the GDPR, that is, prior to May 25, 2018. Please be advised that the revocation shall only have effect for the future. Any processing that was carried out prior to the revocation shall not be affected thereby.

4. Who receives your data?

Within Vontobel, the units given access to your data are those which require them in order to perform our contractual, legal and regulatory obligations. Service providers and various agents employed by us can also receive access to data for the purposes given if they maintain banking secrecy and client confidentiality and comply with our written instructions under data protection law and regulations. These are companies in the categories of banking services, IT services, logistics, printing services, telecommunications, advice and consulting, sales and marketing.

With regard to transferring data to recipients outside Vontobel, we may only disclose information about you if we are legally required to do so, if you have given your consent, if we are authorized to provide information and/or if processors commissioned by us guarantee compliance with the provisions of the GDPR.

5. Is data transferred to any third country or international organization?

Data will only be transferred to countries outside the EU or the EEA (so-called third countries) if this is required for the execution of your client's orders (such as payment and securities orders), prescribed by law (such as reporting obligations under tax law), if you have given us your consent, or in the context of commissioned data processing. If service providers in a third country are used, they are obligated to comply with the data protection levels in Europe in addition to written instructions by agreement to the EU standard contractual clauses. We take seriously our obligation to ensure that any transfers outside the EU or the EEA are only made to entities that can demonstrate equivalence in standards of security and other relevant data processing requirements.

6. For how long will my data be stored?

We process and store your Personal Data for as long as it is necessary for the performance of our contractual obligations and as long as you are authorized to represent the respective legal entity in dealings with us. In this regard, it should be noted that our business relationship is a continuing obligation designed to last for several years. We review, at various points, the different categories of data that we hold to ensure that we do not hold these for an excessive period of time.

If the data are no longer required for the performance of our contractual and statutory obligations, they are regularly deleted, unless their further processing – for a limited time – is necessary, for example, for the following purposes:

- Compliance with record retention periods under commercial and tax law;
- Preservation of all forms of relevant information when litigation is reasonably anticipated, which requires us to keep records for an undefined period of time.

5/7 The storage is based on the legally applicable storage and limitation periods. This should not exceed ten years in most countries. Limitation periods may vary depending on the law applicable to the contract and longer retention periods may be necessary to protect us from any legal claim.

7. Data protection rights

7.1. In general

Every data subject has the right to access (Art. 8 FADP; Art. 15 GDPR), the right to rectification (Art. 5 FADP; Art. 16 GDPR), the right to erasure (Art. 5 FADP; Art. 17 GDPR), the right to restrict processing (Art. 12, 13, 15 FADP; Art. 18 GDPR), the right to object (Art. 4 FADP; Art. 21 GDPR), and if applicable, the right to data portability (Art. 20 GDPR). Furthermore, if applicable, you have the right to lodge a complaint with an appropriate data privacy regulatory authority (Art. 77 GDPR). The rights are dependent on the lawful basis selected for holding the particular data.

You may revoke your consent to the processing of Personal Data at any time. This also applies to the revocation of declarations of consent that are granted prior to the entry into force of the EU General Data Protection Regulation, that is, prior to May 25, 2018. Please be advised that the revocation will only take effect in the future. Any processing that was carried out prior to the revocation shall not be affected thereby.

7.2. Ad hoc right of objection (Art. 21 GDPR)

You have the right to object, on grounds relating to your particular situation, at any time to processing of Personal Data concerning you which is based on processing in the public interest (Art. 6 (1) (e) GDPR) and for the purposes of safeguarding legitimate interests (Art. 6 (1) (f) GDPR); this includes any profiling based on those provisions within the meaning of Art. 4 (4) GDPR.

If you submit an objection, we will no longer process your Personal Data unless we can give evidence of mandatory, legitimate reasons for the processing, which outweigh your interests, rights, and freedoms, or where the processing serves the enforcement, exercise, or defense of interests. Please note that in such cases we will not be able to provide services or maintain a business relationship.

8. Am I under any obligation to provide data?

Within the scope of our business relationship with the legal entity you represent in dealings with us, you must provide Personal Data which is necessary for accepting and executing any representative authority/authorization and the performance of the associated contractual obligations, or which we are legally obligated to collect. As a rule, we would not be able to accept you as the authorized representative/agent without these data or we would have to revoke any existing representative authority/authorization.

In particular, provisions of money laundering law require that we verify your identity before establishing the authority/authorization, for example, by means of your identity card, and that we record your name, place of birth, date of birth, nationality and your residential address. In order for us to be able to comply with this statutory obligation, you must provide us with the necessary information and documents and notify us without undue delay of any changes that may arise during the course of the business relationship. If you do not provide us with the necessary information and documents, we will not be

6/7 allowed to institute or continue the representative authority/authorization requested by the respective legal entity.

9. To what extent is automated decision-making (including profiling) carried out?

We do not make decisions based solely on automated processing as defined in Art. 22 GDPR to establish and implement the business relationship. If we use these procedures in individual cases, we will inform you of this separately, provided that this is prescribed by law. In such a case, you will have a right to object to these procedures under certain circumstances.

10. How do we protect Personal Data?

All personnel accessing Personal Data must comply with the internal rules, policies and processes in relation to the processing of any Personal Data to protect them and ensure their confidentiality. They are also required to follow all technical and organizational security measures put in place to protect the Personal Data.

Vontobel has also implemented adequate technical and organizational measures to protect Personal Data against unauthorized, accidental or unlawful destruction, loss, alteration, misuse, disclosure or access, as well as against all other unlawful forms of processing. These security measures have been implemented taking into account the state of the art of the technology, their cost of implementation, the risks presented by the processing and the nature of the Personal Data, with particular care for sensitive data.

11. Contact

Please also let us know if we do not meet your expectations with respect to the processing of Personal Data or if you wish to complain about our data protection practices; this gives us the opportunity to examine your issue and make improvements, where necessary. In any of these cases, please send us a clear request in writing, together with a clearly legible copy of a valid official ID document (for example, passport or ID card), to one of the entities or the DPO named in section 1. We will acknowledge receipt as soon as received, examine your issue and reply in good time. If a full response will take more than one month, taking into account the complexity and number of the requests, we will advise you of this.

12. Other legislation aspects

In order to comply with other legislation, for example, Directive 2014/65/EU of the European Parliament (MIFID II), we must in some of our legal entities record telephone conversations with reference to operations concluded in the performance of our services. For further information about the treatment of your Personal Data in this regard, please see our complete information at: MIFID landing page.

7/7 **13. Changes to the Privacy Policy**

This data protection information was last updated on May 14, 2018. It may be subject to change. Any future change or additions to the processing of Personal Data as described above affecting you will be communicated through the appropriate channel (for example, it will be posted on our website).

