



HAUCK & AUFHÄUSER
PRIVATBANKIERS SEIT 1796

Privacy Policy

We would hereby like to inform you of how your personal data is processed by the following Hauck & Aufhäuser companies of the Hauck & Aufhäuser Group and your rights under data protection legislation:

- Hauck & Aufhäuser Privatbankiers AG, Luxembourg branch
- Hauck & Aufhäuser Fund Services S.A.
- Hauck & Aufhäuser Alternative Investment Services S.A.
- Hauck & Aufhäuser Fund Platforms S.A.

Responsible for Data Processing

The responsible for Banking and Depository:

Hauck & Aufhäuser Privatbankiers AG,
Luxembourg branch
1c, rue Gabriel Lippmann
5365 Munsbach, Luxembourg
Tel. +352 45 13 14 500
Email: info@hauck-aufhaeuser.com

and

Hauck & Aufhäuser Fund Platforms S.A.
1c, rue Gabriel Lippmann
L-5365 Munsbach
Telefon +352 45 13 14 500
eMail: info@hauck-aufhaeuser.com

The responsible for Fund Administration:

Hauck & Aufhäuser Fund Services S.A.
1c, rue Gabriel Lippmann
5365 Munsbach, Luxembourg
Tel. +352 45 13 14 500
Email: info@hauck-aufhaeuser.com

Furthermore for Alternative Assets Services:

Hauck & Aufhäuser Alternative Investment Services S.A.
1c, rue Gabriel Lippmann
L-5365 Munsbach
Telefon +352 45 13 14 500
eMail: info@hauck-aufhaeuser.com

Data Protection Officer

You can reach our data protection officer using the following details:

Hauck & Aufhäuser Privatbankiers AG,
Niederlassung Luxemburg
Datenschutzbeauftragter
1c, rue Gabriel Lippmann
L-5365 Munsbach
Telefon +352 45 13 14 500
eMail: datenschutz.luxemburg@hauck-aufhaeuser.com

Legal Basis, Sources and Purposes of Data Processing

We process your personal data under the relevant data protection regulations, and particularly based on the EU General Data Protection Regulation (GDPR) and other relevant pieces of national legislation (such as the German Federal Data Protection Act).

We process personal data which we receive from our customers, our business partners and interested individuals in the context of our business relationship. Insofar as doing so is necessary for providing our service, we also process personal data which we permissibly obtain from publicly accessible sources (such as land registries, commercial and association registers, press, Internet) or which is legitimately transferred to us by other companies of the Hauck & Aufhäuser Group or by other third parties.

Relevant personal data includes personal details (name, address and other contact details, date and place of birth, as well as nationality), legitimization information (e.g. identification data) and authentication data (e.g. specimen signature). Additionally, this can also be order data (e.g. payment order), details arising from the fulfillment of our contractual obligations (e.g. turnover information in payment transactions), information about your financial situation (e.g. creditworthiness information, scoring / rating data, source of assets), advertising and sales data, documentation data (e.g. suitability statement) and other data which is comparable to the aforementioned categories.

We process personal data

a. To Fulfill Contractual Obligations (Art. 6, Para. 1 b) of the GDPR)

Data is processed for the purpose of conducting banking transactions and providing financial services in the context of implementing our contracts with our customers and business partners or to implement pre-contractual measures on request.

The purposes of data processing are primarily based on the specific product (e.g. account, custodian account, credit) and may include the likes of requirements analyses, consulting and the performance of transactions. Please refer to the relevant contractual documents and the terms of business for further details on the purposes of data processing.

b. In the Context of Balancing of Interests (Art. 6, Para. 1 f) of the GDPR)

Where necessary, we process your data beyond the actual fulfillment of the contract to protect either our or third parties' legitimate interests.

Examples:

- Business management and further development measures
- In the context of services and products
- Risk management within the H&A Group
- Consultation of and data exchange with credit agencies to determine credit and default risks in the lending business
- Examination and optimization of needs analysis procedures for the purposes of addressing customers directly
- Advertising or market and opinion research, if you have not objected to such use of your data
- Assertion and defense of legal claims
- In the context of legal disputes
- Ensuring the bank's IT security and IT operations

c. Based on Your Consent (Art. 6, Para. 1 a) of the GDPR)

If you have granted us consent to process personal data for specific purposes (e.g. disclosure of data within the Group, email contact details for marketing purposes), the lawfulness of such processing based on your consent is given. You can revoke the consent you granted at any time.

d. Based on Legal Requirements (Art. 6, Para. 1 c) of the GDPR) or in the Public Interest (Art. 6, Para. 1 e) of the GDPR)

We as a bank are also subject to various legal obligations, i.e. legal requirements (e.g. the German Money Laundering Act, the German Securities Trading Act, taxation laws, the German Banking Act) and regulatory requirements (e.g. the European Central Bank, the European banking regulator). For the purposes of processing, these requirements include identity and age checks, fraud and money laundering prevention, credit assessments, the fulfillment of monitoring and reporting obligations under fiscal law, and the assessment and management of risks within both the bank and the H&A Group.

Obligation to Provide Data

In the context of our business relationship, you must provide such personal data which is required for the establishment and implementation of a business relationship as well as the fulfillment of the associated contractual obligations, or such personal data which we are legally obligated to collect. Without this data, we shall generally be unable to conclude or perform the contract with you. In particular, according to regulations under money laundering legislation, we are obligated to identify you using your identity documents before establishing the business relationship, and to collect and record your name, place and date of birth, nationality, address and identification data in this regard. So that we can comply with this legal obligation, you must provide us with the necessary information and documents under the German Money Laundering Act and immediately notify us of any changes during the course of the business relationship. If you do not provide us with the necessary information and documents, we may not establish or continue the desired business relationship.

Categories of Recipients of Personal Data

Within the H&A Group, those parties who require access to your data to meet our contractual and legal obligations receive access to your data. The service providers and vicarious agents we engage may also receive data from us for these purposes, as long as they maintain banking secrecy. These include companies operating, for example, in the categories of credit services, IT services, logistics, printing services, telecommunications, debt collection, advisory services and consulting, as well as sales and marketing.

With regard to the disclosure of data to recipients outside of our bank, it should be noted first of all that we as a bank are obligated to maintain secrecy concerning all customer-related facts and assessments which we become aware of.

We may only disclose information about you if we are required to do so by law, if you have given your consent to this effect, or we are authorized to disclose banking affairs. In these circumstances, recipients of personal data may be:

- Public authorities and institutions (e.g. European Banking Authority, European Central Bank, financial authorities, law enforcement authorities), if a legal or official obligation exists.
- Other credit and financial service institutions or similar establishments to which we transfer personal data for the purpose of implementing the business relationship with you (depending on the contract, these may be correspondent banks, custodian banks, investment companies, stock exchanges and credit agencies).
- Other companies within the Group for the purposes of risk management based on a legal or official obligation. Other data recipients may be those parties for whom you have given us your consent to data transfer or for whom you have released us from our obligation to maintain banking secrecy under the agreement or consent.

If we transfer personal data to service providers outside of the European Economic Area (EEA), such transfer to the third country shall only take place insofar as the European Commission has confirmed an appropriate level of data protection or insofar as other appropriate data protection guarantees (e.g. binding internal data protection regulations or EU standard contractual clauses) exist.

Data transfer to parties in states outside of the European Union ("third countries") takes place insofar as

- Doing so is necessary to executing your orders or our services (e.g. payment and securities orders),
- Doing so is stipulated by law (e.g. reporting requirements under fiscal law), or
- You have given us your consent to this effect.

Data Storage Period

We store personal data for as long as is necessary for performance of the contract. A deviating storage period may result due to legal proof and retention requirements which are regulated in relevant laws and regulations (e.g. in the German Money Laundering Act). The storage periods generally last up to ten years.

Despite this, the storage period may be based on the national legal limitation periods, which may last three or up to 30 years.

Your Rights as a Data Subject

You have a right, according to Art. 15 of the GDPR, to request information about the stored personal data concerning you.

Under certain conditions, you can also request that your personal data be corrected according to Art. 16 of the GDPR or deleted according to Art. 17 of the GDPR, for example:

- If your personal data is no longer needed for the purposes for which it was collected
- If you revoke your consent and there is no other legal basis
- If you object to processing and there are no overriding legitimate grounds for processing
- If your personal data was processed unlawfully
- If your personal data has to be deleted to comply with legal requirements.

Please bear in mind that a right to deletion depends on whether legitimate grounds for data processing exist.

You may also have a right to restriction of processing of your data according to Art. 18 of the GDPR, for example:

- If you dispute the accuracy of your personal data and we had the opportunity to check the accuracy of the same
- If processing is not lawful and you request restriction of use instead of deletion
- If we no longer need your data for the purposes of processing, but you require the same to assert, exercise or defend legal claims
- If you have filed an objection, as long as it has not yet been determined whether your interests take precedence.

If we process your data for statistical purposes, you can object to such processing on grounds relating to your particular situation according to Art. 21, Para. 6 of the GDPR.

You may also be entitled to a right to release of the data you provided in a structured, common and machine-readable format.

In individual cases, you may not be satisfied with our response to your request. In this case, you are entitled to lodge a complaint with H&A's data protection officer and the responsible data protection supervisory authority.

Automated Decision-Making

In some cases, we use the technical features of automated decision-making so that we can offer our services and products quickly and easily. If we do so in your situation, we inform you of this process – if this is prescribed by law. We sometimes process your data automatically with the aim of assessing certain personal aspects (profiling). This applies, for example, to the following cases:

- Due to legal and regulatory requirements, we are obligated to combat money laundering, terrorist financing and other criminal activities which could put assets at risk. Data evaluations (including in payment transactions, etc.) are also carried out. These measures are implemented for your protection in particular.
- Through targeted marketing, we only want to make you offers which are tailored to your needs.
- We use rating procedures to assess the creditworthiness of our potential customers. The aim of the rating procedures is to systematically process information so that we can make decisions on a debtor's creditworthiness situation. Based on historical rating and loss information, statistical probability statements are made concerning the extent of a debtor's default over time which help us make a decision.

Right to Lodge Complaints

You can contact our data protection officer if you have any questions or complaints.

You can also contact the responsible supervisory authority in Luxembourg:

Commission nationale pour la protection des données
Service des plaintes
1, avenue du Rock'n'Roll
4361 Esch-sur-Alzette
Luxembourg

Right of Objection

1. Individual Right of Objection

You have the right on grounds relating to your particular situation to object to the processing of your personal data.

If you object, we shall no longer process your personal data, unless we can demonstrate compelling and legitimate grounds for processing such data which outweigh your interests, rights and freedoms, or unless your personal data is being used to assert, exercise and defend legal claims.

2. Objection to Processing of your Data for our Direct Advertising Purposes

In individual cases, we use your personal data for our direct advertising purposes. You have the right, at any time, to object to this practice; this also applies to profiling if it is in conjunction with such direct advertising. If you object, we shall no longer process your personal data for these purposes. You can object in an informal manner, where possible by contacting:

For Luxembourg:

Hauck & Aufhäuser Privatbankiers AG, Niederlassung Luxemburg
Datenschutzbeauftragter
1c, rue Gabriel Lippmann
L-5365 Munsbach
Telefon +352 45 13 14 500
eMail: datenschutz.luxemburg@hauck-aufhaeuser.com

For Germany:

Hauck & Aufhäuser Privatbankiers AG
Data Protection Officer
Kaiserstraße 24
60311 Frankfurt am Main
Email: Datenschutz@hauck-aufhaeuser.com

In the event of a conflict between the English and German version of this Privacy Policy, the German version will prevail.