



HAL
FUND SERVICES IRELAND

Data Protection Information For Customers

As a member of the Hauck & Aufhäuser Group, consisting of Hauck & Aufhäuser Fund Services S.A. and its subsidiaries Hauck Aufhäuser Administration Services S.A. and HAL Fund Services Ireland Limited (hereinafter "Hauck & Aufhäuser Group"), the protection of your personal data is important to us. We process your personal data in compliance with the applicable data protection regulations for the purposes stated below. In connection with your relationship with us as a client, we provide you with the following information about the processing of your personal data and about your data protection rights in accordance with Art. 13 GDPR.

Person responsible for data processing

HAL Fund Services Ireland Limited.
Address: 26 – 27 Mount Street Upper, Dublin D02 F890
Phone: +353-1-5682218
E-mail: VL-HALFI-Team@hauck-aufhaeuser.com

Data Protection Officer

You can reach our data protection officer at

Contact: Laura O'Doherty
Address: 26 – 27 Mount Street Upper, Dublin D02 F890
Phone: 353-1-5682218
E-mail: HALFI-DataProtect@hauck-aufhaeuser.com

Legal basis and purposes for the processing of personal data

Depending on the business contact with you, we process the following data, among others:

- Master data (name, address, telephone number, e-mail address, date and place of birth, nationality, tax identification number, national insurance number)
- Copy of identity card
- Signatures
- Data on the origin of assets
- Information as part of the money laundering check (e.g. legal proceedings, sanctions/penal measures, politically exposed activities or connections)

What is the legal basis for processing the data?

a. For the fulfilment of contractual obligations (Art. 6 para. 1 lit. b GDPR)

Data is processed for the provision of financial or other services as part of the fulfilment of our contracts with our customers and business partners or for the implementation of pre-contractual measures that are carried out on request.

The purposes of data processing depend primarily on the specific product (e.g. fund management) and may include analyses, advice and the execution of transactions. Further details on the data processing purposes can be found in the relevant contractual documents.

b. On the basis of your consent (Art. 6 para. 1 lit. a GDPR)

If you have given us your consent to process personal data for specific purposes (e.g. transfer of data within the Hauck & Aufhäuser Group), the lawfulness of this processing is based on your consent. You can revoke your consent at any time and free of charge with effect for the future using the contact details above.

c. For the fulfilment of legal obligations (Art. 6 para. 1 lit. c GDPR) or in the public interest (Art. 6 para. 1 lit. e GDPR)

As an Irish management company, we are subject to various legal obligations, such as anti-money laundering laws, tax laws, laws relating to financial services, etc. In addition, there are regulatory requirements such as those of the European Securities and Markets Authority (ESMA) or national supervisory authorities. These include identity checks, fraud and money laundering prevention, the fulfilment of control and reporting obligations under tax law and the assessment and management of risks in the Hauck & Aufhäuser Group.

d. For the protection of legitimate interests (Art. 6 para. 1 lit. f GDPR)

Where necessary, we process your data to protect legitimate interests that we have weighed up against your interests, rights and freedoms. Without using the data, we cannot for example

- conduct advertising, market and opinion research,
- promote the further development of our services and products,
- operate risk management within the Hauck & Aufhäuser Group,
- secure payments in arrears or prevent breaches of the law,
- guarantee IT security.

You can object to the processing at any time using the contact details above.

We usually collect the data directly from you. In certain cases, we may receive data from other sources, such as other companies in our Hauck & Aufhäuser Group, competent authorities, credit agencies or business partners. Furthermore, in certain cases we may use data from publicly accessible sources (e.g. land registers, commercial and association registers, press, internet).

Obligation to provide data

As part of our business relationship, you should provide the personal data that is necessary for the establishment and execution of a business relationship and the fulfilment of the associated contractual obligations or that we are legally obliged to collect. Without this data, we will generally not be able to conclude or fulfil the contract with you. In particular, we are obliged under money laundering regulations to identify you using your identity document before establishing the business relationship and to collect and record your name, place of birth, date of birth, nationality, address and identity card details. To enable us to fulfil this legal obligation, you must provide us with the information and documents required under the Money Laundering Act and notify us immediately of any changes that arise in the course of the business relationship. If you do not provide us with the necessary information and documents, we may not enter into or continue the business relationship requested by you.

Categories of recipients of the personal data

Within the Hauck & Aufhäuser Group, those companies that need your data to fulfil our contractual and legal obligations will have access to it.

Service providers used by us may also receive data for these purposes. These are service providers who process personal data on our behalf, i.e. in accordance with our instructions and on the basis of an order processing contract (in accordance with Art. 28 GDPR) (e.g. printing and dispatch, customer service, brokerage, consulting, project management, IT services, software operators, hosting, maintenance, communication, data collection, data management, evaluation, archiving, disposal). Your data will also be passed on to authorised agents and service providers who process the data as their own controllers (e.g. tax consultants, auditors, lawyers, notaries, insurers, payment service providers, banks, investment companies).

Recipients of your personal data may also be

- Public bodies and institutions (e.g. European financial supervisory authorities, national supervisory authorities, law enforcement authorities, company registers, registers of beneficial owners)
- Other credit and financial services institutions or comparable organisations to which we transfer personal data in order to carry out the business relationship with you (depending on the contract, e.g.

correspondent banks, custodian banks, investment companies, stock exchanges, credit agencies).

Data may be transferred to countries outside the EU or EEA (third countries) (for the purpose of contract fulfilment) exclusively on the basis of an adequacy decision by the EU Commission or subject to suitable guarantees, a copy of which we will make available to you on request.

Duration of data storage

Your data will be deleted when the purpose for which it was collected no longer applies. This means that we store the data for as long as we are legally obliged to store the data. If there is no statutory retention period, we store the data for the duration of the contractual relationship with you or the company for which you work. If we process the data to protect legitimate interests, it will be deleted as soon as the legitimate interest no longer exists.

Your rights as a data subject

You have the following rights under the GDPR, which you can assert against us. Please note that some of these rights are subject to conditions.

- Information about the personal data concerning you
- Correction of your personal data
- Deletion of your personal data
- Restriction of the processing of your personal data
- Objection to the processing of your personal data
- Revocation of consent given to us, with effect for the future
- Data portability

If you wish to exercise your rights, please contact our data protection officer using the contact details given above.

You also have the right to submit a complaint with any supervisory authority for data protection. The supervisory authority responsible for us is

Data Protection Commission
6 Pembroke Row
Dublin 2
D02 X963
Ireland
Phone: (+353) 1-765 01 00