

Data Protection Notice

By completing the Declaration, you are providing personal data to the Fund and/or the Management Company. This notice is to make you aware of how the Fund and the Management Company as joint data controllers (Joint Controllers) hold, use and process your personal data, as well as the steps we are taking to ensure our data processing is in compliance with the Luxembourg data protection law of 2 August 2002, and as of 25 May 2018, as replaced by General Data Protection Regulation (EU/2016/679) (**GDPR**) and any implementing legislation (**Data Protection Legislation**).

Scope:

This Notice applies to you and to any third parties whose information you provide to us in connection with our relationship with you. Please ensure that a copy of this Notice is provided to any third parties whose personal data you provide to us. We may update this Notice from time to time and we will notify you in writing of any changes we make.

Nature, Purpose and Legal Basis of Processing:

The Fund may hold some or all of the following types of your personal data: e.g. investor name, e-mail, phone number, address, account numbers, data on transactions, trading and settlement and any other information required to perform requested services (Personal Data).

Your Personal Data will be processed to process, manage and administer your holding(s) and any related accounts on an on-going basis.

We will process your Personal Data as necessary for the performance of your contract with us. We will also process Personal Data as necessary to comply with Joint Controllers' legal obligations. We will inform you if we intend to further process your Personal Data for a purpose other than those set out above. We may also seek your consent to the processing of your Personal Data for other specific purposes. You will have the right to withdraw such consent at any time.

Recipients of your Personal Data:

Your Personal Data will be disclosed to, and processed by, Brown Brothers Harriman (Luxembourg) S.C.A., which will be the Transfer Agent of the Fund for the purposes of this Data Protection Notice. We will disclose your Personal Data to the Transfer Agent for the purposes of carrying out the services of administrator and registrar of the Fund and to comply with legal obligations, including under company law and anti-money laundering legislation or foreign regulatory requirements. The Transfer Agent may in turn disclose your Personal Data to agents or other third parties where necessary to carry out these purposes.

We may also disclose your Personal Data to:

- The Depositary;
- The MLRO, the Manager, the Investment Manager and our or their duly authorised agents and related, associated or affiliated companies;
- Agents of the Administrator who process the data for anti-money laundering purposes or for compliance with foreign regulatory requirements; and
- Other third parties including legal or financial advisors, regulatory bodies, auditors and technology providers.

Your Personal Data may also be disclosed to the Luxembourg tax authorities, which in turn may, acting as data controller, disclose it to foreign tax authorities.

We take all reasonable steps, as required by Data Protection Legislation, to ensure the safety, privacy and integrity of your Personal Data and may, as appropriate, enter into contracts with such third parties to protect the privacy and integrity of any Personal Data supplied to us.

Transfers of Personal Data outside the EEA:

We may transfer your Personal Data to countries outside of Luxembourg (including the United States of America and Hong Kong) which may not provide an adequate level of protection. In such cases, we will take all steps reasonably necessary to ensure that your Personal Data is treated securely, and that appropriate safeguards are in place to protect the privacy and integrity of such Personal Data, in accordance with Data Protection Legislation. Please contact us if you wish to obtain more information concerning these safeguards.

Regulatory Checks and Sanctions Regimes:

In addition to fulfilling the obligations of the Joint Controllers, the Transfer Agent may be subject to its own additional anti-money laundering or foreign regulatory requirements, which may include the requirement to cross-check your Personal Data against applicable governmental sanctions lists, implemented by the European Union, the United Nations and the United States of America. This processing of your Personal Data is also necessary for the performance of your contract with us and may involve disclosure of your Personal Data to other entities and the transfer of your Personal Data outside of Luxembourg. Please contact us if you want to obtain more information.

Where you do not provide your Personal Data:

If you do not provide us with your Personal Data, we may not be able to process your investor application. We will tell you when we ask for information which is a contractual requirement or required to comply with our legal obligations.

Security and Retention of your Personal Data:

The Joint Controllers take all reasonable steps as required by Data Protection Legislation to ensure the safety, privacy and integrity of your Personal Data. The Joint Controllers will retain your Personal Data only for as long as is necessary to manage your investment, meet regulatory requirements and carry out the purposes set out above and/or to comply with any legal obligations (whichever is longer), subject to statutory periods of limitation.

Your Rights:

You have a right to obtain a copy of, and the right to rectify any inaccuracies in, the Personal Data we hold about you by making a request to us in writing. You also have the right to request erasure, restriction, portability and to not be subject to a decision based on automated processing.

You should inform us of any changes to your Personal Data. If you wish to assert any of your rights, please contact us. We will respond to your request in writing, or orally, if requested, as soon as practicable and in any event not more than one month after receipt of your request.

You have the right to lodge a complaint with the Luxembourg Data Protection Authority if you are unhappy with how your Personal Data is being handled.

Contact Us:

If you have any queries regarding this Data Protection Notice, please contact us.