



Sumitomo Mitsui DS Asset Management (UK) Limited

Privacy Notice

Last Updated: 23 May 2024



Sumitomo Mitsui DS Asset Management

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1. Scope

Sumitomo Mitsui DS Asset Management (UK) Limited (the “**Firm**” or “**we**”) respects your concerns about privacy.

This Privacy Notice (the “**Notice**”) describes how the Firm may collect, store, use and/or disclose (“**process**”) Personal Data related to the Firm’s current clients and investors, prospective clients, website visitors, job applicants, employees, third-party service providers and other parties whose information is provided to the Firm by any of the aforementioned parties, for example by the Firm’s current clients and investors (“**you**”). This Notice describes how and why we process Personal Data and what rights you can exercise with respect to your Personal Data.

This Notice applies when the Firm acts as the data controller within the meaning of the UK GDPR, as well as when SMD-AM Funds (the “**UCITS Fund**”), the fund for which the Firm acts as the delegated investment manager, act as a joint data controller together with Kroll (Luxembourg) Management Company S.à r.l., the UCITS Fund’s management company.

“**Personal Data**” shall have the meaning assigned to it under the UK General Data Protection Regulation (“**UK GDPR**”) and UK Data Protection Act 2018 (“**UK DPA**”) In the context of the UCITS Fund we manage, Personal Data shall have the meaning assigned to it under the EU General Data Protection Regulation (EU) 2016/679 (“**EU GDPR**”). The UK GDPR, UK DPA and EU GDPR are herein being referred to as the “**Data Protection Legislation**”.

2. About Us

The Firm is a UK UCITS manager managing on a delegated basis the UCITS Fund, a CSSF authorised fund. The Firm also manages segregated mandates for institutional clients.

The Firm is registered in England and Wales (company registration number: 01660184). The Firm is registered with the UK Information Commissioner’s Office (registration number: Z6469739).

3. What Personal Information We Collect, Why, and Lawful Basis

The Personal Data we collect relates to the individuals below.

Individuals	What personal information	Why do we collect the personal information	Lawful basis of Processing
Clients (Segregated mandates)	<ul style="list-style-type: none"> Personal identification and contact information (such as name, postal address, email address, telephone number) Financial information (such as account information) Data on transactions Trading and settlement information Any other information required to perform the 	<ul style="list-style-type: none"> To process, manage and administer your holding(s) in the Firm’s separate accounts/advisory engagement(s) To respond to clients’ inquiries To send information, including client reports 	<ul style="list-style-type: none"> Performance of a contract Consent

	requested services		
UCITS Investors	<ul style="list-style-type: none"> Generally, no Personal Data as the Personal Data are directed to BBH Brown Brothers Harriman (Luxembourg) S.C.A., who acts as the custodian, depository and transfer agent of the UCITS Fund 	<ul style="list-style-type: none"> Generally, no Personally Data 	<ul style="list-style-type: none"> Generally, no Personal Data
Prospective clients and investors	<ul style="list-style-type: none"> Information to allow us to identify and verify the identity of the prospective client, including, if applicable, its beneficial owner Any information we may obtain from third parties, such as public databases, third party marketers, to allow us to market our business 	<ul style="list-style-type: none"> To comply with applicable legal and regulatory obligations, including anti-money laundering and terrorist financing laws and regulations To send promotional material so as to market and improve our business 	<ul style="list-style-type: none"> Performance of a contract Consent Legal and regulatory obligation Legitimate Interest Public interest
Website visitors	<ul style="list-style-type: none"> Information that is being requested in the website form located in the Firm's website (i.e., name and email address) IP address Device, browser and geographical information Cookies 	<ul style="list-style-type: none"> To allow prospective clients and investors to get in touch with us To analyse visitors' behaviours 	<ul style="list-style-type: none"> Consent
Job Applicants and Employees	<ul style="list-style-type: none"> Professional information, which includes: Resume/CV Current/past employment history Education history Professional designations and qualifications Work authorization status Any other voluntary information provided by the job applicant or employee, for example gender, sexual orientation 	<ul style="list-style-type: none"> To manage your job application and assess your qualifications To comply with the pre-employment screening obligation 	<ul style="list-style-type: none"> Performance of a contract Consent Legal and regulatory obligation Legitimate interest Public interest

<p>Third party service providers</p>	<ul style="list-style-type: none"> • Contact information (such as name, postal address, email address) 	<ul style="list-style-type: none"> • To comply with applicable legal and regulatory obligations, including anti-money laundering and terrorist financing laws and regulations • To interact with third-party service providers, including to send queries and information so the providers can perform the requested services 	<ul style="list-style-type: none"> • Performance of a contract • Consent • Legal and regulatory obligation • Legitimate interest • Public interest
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4. Disclosure of Personal Data

We may disclose Personal Data to our parent company, Sumitomo Mitsui DS Asset Management Company, Limited, headquartered in Tokyo, Japan, to whom the portfolio management is delegated, and other group companies, including Sumitomo Mitsui DS Asset Management (Hong Kong) Limited.

We may disclose Personal Data to third-party service providers to us and the UCITS Fund we manage on a delegated basis, including legal counsel, auditors, IT service providers, third-party email marketers, and other counterparties. The UCITS Fund we manage may disclose Personal Data to Kroll (Luxembourg) Management Company S.à.r.l., who acts as its management company, and Brown Brothers Harriman (Luxembourg) S.C.A. (“**BBH**”), who acts as its custodian, transfer agent, administrator, and depositary. BBH may in turn disclose Personal Data to its agents or other third parties, where necessary, to carry out the services under the applicable investor service agreement with the UCITS Fund.

We may use third-party web analytics service providers on our sites, such as those of Google Analytics, to help us analyse how visitors use our website. The information processed for this purpose include user engagement information (for example page views), device, browser and geographical information e.g., information based on IP address).

We may disclose Personal Data if (i) required by law or legal process, (ii) to law enforcement authorities, regulators and/or other government entities and/or other competent authorities based on a lawful disclosure request, (iii) when we believe disclosure is necessary or appropriate to prevent harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity; or (iv) to tax authorities.

5. Marketing and Opt-Out

Marketing, including by electronic means, requires express consent for you to receive marketing. You can unsubscribe from such marketing communications either by clicking on the opt-out link in the marketing communication you will receive from us or third parties or by contacting us as set out in the “How to Contact Us” section of this Notice.

6. International Transfers

To be able to provide cross-border services, we may transfer Personal Data outside of the UK to countries that provide an adequate level of protection, for example, Luxembourg, Japan.

We may also transfer Personal Data to countries that do not provide an adequate level of protection, such as the United States of America and Hong Kong. In such cases, the Firm will ensure that appropriate safeguards

are in place for any such transfer such as the EU Standard Contractual Clauses adopted by the European Commission, or the UK Appendix (or the UK International Data Transfer Agreement) adopted by the Information Commissioner's Office.

7. Data Retention

We will retain your Personal Data for as long as necessary to manage your investment, meet legal and regulatory obligations and carry out the purposes set out above (whichever is longer), and afterwards in accordance with the Firm's legal and regulatory obligations.

8. Your Rights

You have the following rights in connection with the processing of your Personal Data.

You have the right of access to the Personal Data and right to request the rectification of inaccurate Personal Data we hold about you.

You have the right to request erasure, restriction of processing, portability, right to object, and to not be subject to a decision based on automated processing.

You can also lodge a complaint about our processing with the appropriate regulator.

If you wish to exercise any of your rights, please contact us as set out below.

9. How to Contact Us

If you have any questions or comments about this Notice, you may contact us at mb_ukprivacy@smd-am.co.jp.

You may also write us at:

Sumitomo Mitsui DS Asset Management (UK) Limited

Attn: Legal & Compliance

100 Liverpool Street

London EC2M 2AT

United Kingdom

10. Cookie Policy

Please see our separate [Cookie Policy](#).

11. Update to our Notice

We may update this Notice from time to time. The updated Notice will be indicated in "Last updated" date at the top of this Notice. For any material changes to this Notice you will be notified either by us prominently posting a copy the updated Notice or by directly sending you a notification as to the updates made to this Notice.