

EMEA DATA PRIVACY NOTICE

This notice sets out how Northern Trust will process personal information as a Data Controller

Where your details are provided to Northern Trust in connection with Northern Trust:

- providing its products and services from within Europe; or
- providing or offering products or services to you if you are an individual located in Europe,

Please note the following:

PURPOSES OF PROCESSING AND LEGAL BASIS FOR PROCESSING

Northern Trust may process your personal information for the following purposes:

- Managing and administrating your holdings in any relevant fund and/or managing any account you may hold with Northern Trust on an on-going basis (the “**Services**”);
- Northern Trust will itself (or through a third party e.g. credit reference agency) process certain information about you or your directors, officers and employees and your beneficial owners (if applicable) in order to carry out anti-money laundering (**AML**) checks and related actions which Northern Trust considers appropriate to meet any legal obligations imposed on Northern Trust relating to, or the processing in the public interest or to pursue Northern Trust’s legitimate interests in relation to, the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions, on an on-going basis, in accordance with Northern Trust’s AML procedures;
- to report tax related information to tax authorities in order to comply with a legal obligation;
- to monitor and record calls and electronic communications for investigation and fraud prevention purposes, for crime detection, prevention, investigation and prosecution, and to enforce or defend Northern Trust and its affiliates’ rights, itself or through third parties to whom it delegates such responsibilities or rights in order to comply with a legal obligation imposed on Northern Trust or to pursue Northern Trust’s legitimate interests in relation to such matters or the processing in the public interest;
- to monitor and record calls for quality, business analysis, training and related purposes in order to pursue the legitimate interests of Northern Trust to improve its service delivery;
- to update and maintain records and for fee billing;
- to carry out statistical analysis and market research;
- to provide you with information about products and services which may be of interest to you or to the institution you represent,

And which processing is necessary to perform a relevant contract with you, comply with legal obligations and/or which is necessary for Northern Trust’s legitimate interests indicated above and/or where the processing is in the public interest; and

- to retain AML and other records of individuals to assist with subsequent screening of them, including in relation to investment in other funds or the provision of other services by Northern Trust, to pursue Northern Trust’s and (in some circumstances) its clients’ legitimate interests.

RECIPIENTS OF DATA AND INTERNATIONAL TRANSFER OF DATA

Northern Trust may disclose your personal information as follows:

- to credit reference agencies (e.g. Experian) in order to carry out money laundering and identity checks and comply with legal obligations;
- to Northern Trust affiliates and third party vendors in order to process the data for the above mentioned purposes;
- to competent authorities (including tax authorities), courts and bodies as required by law or requested or to affiliates for internal investigations and reporting; and

The disclosure of personal information to the affiliates and other third parties set out above may involve the transfer of data to the USA and other jurisdictions outside the European Economic Area (EEA). Such countries may not have the same data protection laws as your jurisdiction. Northern Trust have put in place the Standard Contractual Clauses approved by the European Union Commission for such transfers of personal data. Please contact Privacy_Compliance@ntrs.com should you require more information on Northern Trust's international data transfer solution.

RETENTION PERIOD

Northern Trust will retain your personal information for as long as is required to perform the Services, or the service to the institution you represent, and/or for the purposes for which the data was collected, depending on the legal basis for which that data was obtained and/or whether additional legal/regulatory obligations mandate that Northern Trust retains your personal information.

DATA SUBJECT RIGHTS

You have the following rights, in certain circumstances, in relation to your personal information:

- Right to access your personal information.
- Right to rectify your personal information.
- Right to restrict the use of your personal information.
- Right to request that your personal information is erased.
- Right to object to processing of your personal information.
- Right to data portability (in certain specific circumstances).

Where you have provided your consent to processing (e.g. to receive information about products and services which may be of interest to you or to the institution you represent), you may withdraw your consent at any time by contacting Northern Trust by email at Privacy_Compliance@ntrs.com.

Where Northern Trust requires your personal information to comply with AML or other legal requirements, failure to provide this information means Northern Trust may not be able to provide the Services or the service to the institution you represent.

You have the right to lodge a complaint with a supervisory authority.

HOW TO CONTACT US

If you have any questions about our use of your personal information, please contact us at Privacy_Compliance@ntrs.com.