

IFSL International Limited

Data Protection Privacy Notice

1. Data Protection Privacy Notice

- 1.1 In this notice (the “**Data Protection Privacy Notice**”), “IFSL”, “we”, “us” and “our” means IFSL International Limited and, if you invest in any collective investment scheme which is operated by IFSL, including for the purposes of this Data Protection Privacy Notice, if relevant and as the context requires, a sub-fund of any collective investment scheme operated by IFSL (a “**Fund**”). The “Administrator” means any person appointed by a Fund with responsibility for investor onboarding, transfer agency and/or ancillary services. We are committed to respecting your privacy. We are registered in Ireland, with our registered office address at 7/8 Mount Street Upper, Dublin 2, Ireland. Further company details are set out on our website: <https://www.marlboroughfunds.com>.
- 1.2 For the purposes of data protection law IFSL and, where applicable, each Fund and the Administrator is a separate data controller in respect of your personal data. We are responsible for ensuring that we use your personal data in compliance with data protection law. The below clauses in this Data Protection Privacy Notice set out the basis on which any personal data about you, that you provide to us and/or the Administrator, that is created, collected or generated about you by us and/or the Administrator, will be processed by us or the Administrator.
- 1.3 This Data Protection Privacy Notice also applies to (i) any person whose personal data has been provided to us in connection with an application to open an Account and/or subscribe for Shares in a Fund (which could include a director, partner, trustee, employee, agent or direct or indirect owner of an applicant); or (ii) where we otherwise use a person’s personal data. For the purpose of this Data Protection Privacy Notice, a reference to “you” and “your” shall include the client of IFSL who opens an Account, as well as any connected individual described in this Section 1.3.

Personal data we collect about you

- 1.4 IFSL and/or the Administrator may collect and process the following data about you:
- (A) information provided to IFSL and/or the Administrator by you or (if different) the applicant in connection with your Account, your investment in a Fund or your use of the Services:
- This might include your name and address (including proofs of name and address), contact details, date of birth, gender, nationality, photograph, signature, copies of identity documents, occupational history, job title, income, assets, other financial information, bank details, investment history, tax residency and tax identification information. Such information might be provided in a document (including as part of an application process or at other times), face-to-face, by telephone, by email or otherwise;
- (B) information that IFSL and/or the Administrator collects or generates:

This might include information relating to your (or an applicant's) investment in a Fund, your Account and transactions, use of the Services, a record of any correspondence between you and us (or our representatives), any recordings of telephone calls and website use data; and

- (C) Information that obtained by IFSL and/or the Administrator from other sources:

This might include information obtained for the purpose of our know-your-client procedures (which include anti-money laundering procedures, counter-terrorist financing procedures, politically-exposed-person checks, sanctions checks, among other things), information from government or public bodies, public websites and other public sources and information received from the applicant's advisers or intermediaries.

Use of your personal data

- 1.5 Your personal data may be stored and processed by IFSL and/or the Administrator for the following purposes:

- (A) to set up and manage your Account or any other accounts required and/or process your transactions in Shares and other Share dealings, including to perform anti-money laundering and know-your-client procedures, receiving payments from and making payments to you, calculating the net asset value of a Fund and more generally to perform processes for the opening of Accounts or any other required accounts and to oversee those processes;
- (B) to provide you with information on products you may have requested through the Services, to notify you about changes to the Services and to ensure the on-going accuracy and relevance of such data;
- (C) general business administration, including communicating with investors in a Fund, communicating with service providers and counterparties, accountancy and audit services, risk monitoring, the administration of IT systems;
- (D) compliance with legal and regulatory obligations and industry standards, including know-your-client procedures, the automatic exchange of tax information and legal judgments, economic or trade sanctions, on an ongoing basis, in accordance with the procedures of IFSL and/or the Administrator (as relevant);
- (E) for general internal research purposes, including to identify and analyse the regularity of use of particular aspects of the Services and the nature of the users of the Services;
- (F) in respect of information shared with any investment manager(s) appointed in respect of a Fund (and its/their affiliates), business activities relating to a Fund, such as investor relations, discussions with the Fund's service providers and counterparties, decision-making in relation to a Fund, and business strategy, development and marketing;
- (G) to improve the design of products and services for your use; and
- (H) to market certain products, services, events and content that may be of interest to you.

- 1.6 IFSL and the Administrator are entitled to process your personal data in the ways described above in this Data Protection Privacy Notice for the following reasons:

- (A) if you are the applicant for Shares, you may enter into a contract with us and some processing will be necessary for the performance of that contract, to provide the Service to you and to satisfy our obligations to you, or will be done at your request prior to entering into that contract;
- (B) processing may be necessary to discharge a relevant legal or regulatory obligation;
- (C) the processing will, in all cases, be necessary for the legitimate business interests of us (or one or more of our affiliates), an investment manager appointed in respect of a Fund, or another person, such as:
 - (1) carrying out our ordinary or reasonable business activities, or those of the applicable investment manager, or other persons, or other activities previously disclosed to our clients/investors or referred to in this Data Protection Privacy Notice;
 - (2) ensuring compliance with all legal and regulatory obligations and industry standards, and preventing fraud;
 - (3) establishing, exercising or defending legal rights or for other purposes relating to legal proceedings;
 - (4) ensuring the security of information systems; and
 - (5) conducting marketing and promoting our business, products and services.
- (D) in respect of any processing of sensitive personal data falling within special categories, such as any personal data relating to the political opinions of a politically exposed person, the processing will be necessary for reasons of substantial public interest.

Disclosure of your personal data to third parties

- 1.7 IFSL and/or the Administrator may from time to time, in accordance with the purposes described in this Data Protection Privacy Notice above, disclose your personal data to other parties, including (a) other members of IFSL's and/or the Administrator's group, (b) the investment managers and its/their affiliates appointed in respect of the Fund, (c) professional advisers such as law firms and accountancy firms, (d) other service providers, agents and contractors, (e) counterparties and (f) courts and regulatory, tax and governmental authorities. Some of these persons will process your personal data in accordance with our instructions and others will themselves be responsible for their use of your personal data. These persons may be permitted to further disclose the personal data to other parties.

Transfers of your personal data outside of the European Economic Area

- 1.8 Your personal data may be transferred to and stored by persons outside the European Economic Area (the "EEA"), and in particular may be transferred to and stored by affiliates or service providers of IFSL and/or the Administrator outside the EEA.
- 1.9 Where personal data is transferred outside the EEA, we will ensure that the transfer is subject to appropriate safeguards or is otherwise permitted under applicable law. For example, the country to which the personal data is transferred may be approved by the European Commission, the recipient may have agreed to model contractual clauses approved by the European Commission that oblige them to protect the personal data, or the recipient may be located in the United States and be a certified member of the EU-US Privacy Shield scheme.

- 1.10 You can obtain more details on the protection given to your personal data when it is transferred outside the EEA, including a copy of any standard data protection clauses entered into with recipients of your personal data, by contacting us using the details set out under “Contacting us” in this Data Protection Privacy Notice below.

Necessity of personal data

- 1.11 The provision of certain personal data is necessary for us to provide the Service and for Shares to be issued to any applicant and for our compliance (and that of our service providers including the Administrator) with certain legal and regulatory obligations. Accordingly, if certain personal data is not provided when requested, an application might not be accepted or this may have other repercussions for your investment in Shares.

Retention of personal data

- 1.12 How long IFSL and/or the Administrator hold your personal data for will vary. The retention period will be determined by various criteria including:
- (A) the purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose; and
 - (B) legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data.

Your rights

- 1.13 You have a number of legal rights in relation to the personal data. These rights include the following:
- (A) the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
 - (B) the right to withdraw your consent to the processing of your personal data at any time. Please note, however, that IFSL and the Administrator may still be entitled to process your personal data if there is another legitimate reason (other than consent) for doing so;
 - (C) in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that data transmitted to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us;
 - (D) the right to request that your personal data be rectified if it is inaccurate or incomplete;
 - (E) the right to request that your personal data is erased in certain circumstances. Please note that there may be circumstances where you ask for your personal data to be erased but IFSL and/or the Administrator is legally entitled and required to retain it;
 - (F) the right to object to, and the right to request that the processing of your personal data is restricted in certain circumstances. Again, there may be circumstances where you object to, or ask that the processing of your personal data be restricted but that IFSL and/or the Administrator are legally entitled and required to continue processing your personal data and / or to refuse that request; and

- (G) the right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.
- 1.14 You can exercise your rights by contacting us using the details set out in the “Contacting us” section below.
- 1.15 You can find out more information about your rights by contacting the appropriate EU data regulator such as the Irish Data Protection Commission, or by searching their website at <https://www.dataprotection.ie/>.

Contacting us

- 1.16 If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed above, please address questions, comments and requests to +44 1204 589336.

2. Interpretation

- 2.1 Except where the context otherwise requires, in this Data Protection Privacy Notice the following words and expressions shall have the meanings set out below:

“**Account**” means an account opened in your name to effect, redeem or hold, Shares;

“**Services**” means any Accounts you open with IFSL and the investments you hold through them and any ancillary services which IFSL may provide to you from time to time;

“**Share**” means a share, unit or interest of an investor in a Fund which represents the economic interest of an investor in a Fund;; and