

# **PRIVACY NOTICE**

## **Introduction**

In this Privacy Notice the terms “we”, “us” and “our” shall refer to **U.S. Bank Global Fund Services (Ireland) Limited** (“USBGFSIL”).

Investors should note that, by virtue of making an application to invest in the fund (including completing the application form), the investor will provide us with personal data and/or with personal data on individuals connected with the investor (for example directors, trustees, employees, representatives, clients, beneficial owners, agents and officers of investors). If you are an institutional investor that provides the fund with personal data on individuals connected with you for any reason in relation to your investment in the fund, the information contained in this privacy notice will be relevant for those individuals and you should forward this document to such individuals or otherwise advise them of its content.

**This privacy notice sets out the basis on which personal data about you will be processed by us.**

## **Personal data which may be used by us**

We may process the following personal data about you which we may receive from you by virtue of you making an application to invest in the fund (including completing the application form) or from other sources; (i) your name and address (including proofs of name and address), contact details, date of birth, gender, nationality, photograph, signature, occupational history, job title, income, assets, bank details, other financial information and tax residency and (ii) information obtained for the purpose of the know-your-client procedures (which include anti-money laundering procedures, counter-terrorist financing procedures, politically-exposed-person checks, sanctions checks, criminal convictions and offences), and information from public websites and other public sources.

## **Purposes of Processing and Legal Basis for Processing**

The personal data collected from you or provided by you or on your behalf in connection with your investment in the fund will be collected, stored, disclosed, used and otherwise processed by USBGFSIL for the purposes of entering into and performing its obligations under an agreement to provide administration services to the fund.

The legal basis for such processing by us is the necessity (i) to comply with the legal obligations imposed on us including in respect of obligations under legislation including anti-money laundering and sanctions screening and (ii) to pursue legitimate interests.

The legitimate interests for the processing by us of your personal data include, sanctions screening, the retention of your personal data on and maintenance of a single anti-money laundering record, risk oversight, monitoring, analysis, auditing of our business and IT systems, and carrying out the ordinary and reasonable business activities of a fund administrator. The maintenance of a single anti-money laundering record will mean that anti-money laundering data collected from you may be relied on to satisfy anti-money laundering requirements for investments by you in other collective investment schemes where USBGFSIL is appointed as the administrator. Please also note that where the legitimate interest is the legal basis for processing of your personal data for sanctions screening, and such sanctions screening is mandatory for our organization, it is not based on the EEA and/or United Kingdom applicable legislation.

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**

We may from time to time, in accordance with the purposes described above, disclose your personal data to other parties, including its affiliates, professional advisers such as law firms and accountancy firms, other service providers of the fund, courts and regulatory, tax and governmental authorities and third parties in connection with any proposed or actual reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business. 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 the European Economic Area and/or United Kingdom**

Your personal data may be transferred to and stored by persons outside the European Economic Area (the “EEA”) and / or the United Kingdom and may be transferred to and stored by our affiliates outside the EEA and/or the United Kingdom.

Where personal data is transferred outside the EEA and/or the United Kingdom, 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 as an adequate territory, the recipient may have agreed to model contractual clauses approved by the European Commission (and/or United Kingdom International Data Transfer Agreement respectively) that oblige them to protect the personal data.

You are entitled, upon request, to receive a copy of the relevant safeguards that have been taken to protect your personal data during such transfer. Please send your request to the EU data protection office specified at the end of this privacy notice.

## **Retention of personal data**

How long we will hold your personal data for will vary. The retention period will be determined by various criteria, including the purposes for which we are using it (as it will need to be kept for as long as is necessary for any of those purposes) and legal obligations (as laws or regulations may set a minimum period for which we have to keep your personal data).

## **Your data protection rights**

Under data protection laws, you - and any other individuals whose personal data we process - have several rights, including the right to:

- Be informed: we have to tell you about how we process your personal data.
- Access your data: you can ask whether we are processing your personal data and ask for a copy of the information we hold about you.
- Request corrections: if any of the data we hold about you is inaccurate or incomplete, you can ask us to correct or update it.
- Request erasure: in certain circumstances, you can ask us to delete your personal data.
- Restrict processing: in some cases, you might be able to ask us to limit how we use your data.
- Data portability: where we process your data based on consent or because of a contract, you have the right to receive an electronic copy of it or ask us to transfer it to another organisation.
- Object to processing: you can object to us processing your personal data. If your objection relates to direct marketing, that’s an absolute right, which means we have to stop using your information for that.
- Challenge automated decisions: if we make a decision based solely on automated processing (without human involvement), you can ask for a real person to look at it again if you disagree with the outcome.

If you’d like to exercise any of these rights or have questions about how we handle your information, just let us know.

If you’re unhappy with how we’ve processed your information, you have the right to lodge a complaint with the Data Protection Commissioner via their website at [dataprotection.ie](http://dataprotection.ie) or through any other available contact methods. If you live in the UK or another EU country, you can also submit a complaint to your local Data Protection Supervisory Authority.

You also have the right to object to the processing of your data where we consider this to be necessary for the purposes of our legitimate interests.

Please note that the right for your data to be erased (the “right to be forgotten”) that applies in some contexts is not likely to be applicable to most, if not all, of the personal data held by us, given the specific nature of the purposes for which the data is used, as described above.

You can exercise your rights by contacting the EU data protection office specified at the end of this privacy notice. You can find out more information about your rights by contacting an EU data regulator such as the Irish Data Protection Commissioner Office, or by search in g their website at [www.dataprotection.ie](http://www.dataprotection.ie).

## Getting in touch

Should you have any queries in respect of this privacy notice or wish to discuss your data protection rights with us, please contact us at the EU Data Protection Office at U.S. Bank Europe DAC via [EUDataProtectionOffice@usbank.com](mailto:EUDataProtectionOffice@usbank.com) or at Block F1, Cherrywood Business Park, Cherrywood, Dublin 18, D18 W2X7, Ireland.

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