

Data Privacy Notice



This version is applicable from 25 May 2018 as a result of the entry into force of the EU General Data Protection Regulation (“GDPR”). This Data Privacy Notice may need to be amended from time to time including in case of regulatory or operational changes, in such case the applicable up-to-date version will be published on our website (<https://www.jfml.lu>).

INTRODUCTION

Japan Fund Management (Luxembourg) S.A. (“JFML”) is a management company authorised under Chapter 15 of the Luxembourg Law of 17 December 2010, as amended, and an alternative investment fund manager authorised under the Luxembourg Law of 12 July 2013, as amended. JFML manages undertakings for collective investment subject to Part I or Part II of the Luxembourg Law of 17 December 2010, specialised investment funds subject to the Luxembourg Law of 13 February 2007, reserved alternative investment funds subject to the Luxembourg Law of 23 July 2016, as well as Irish unit trusts subject to the Irish Unit Trust Act, 1990.

In accordance with the provisions of the data protection law applicable to the Grand Duchy of Luxembourg, and with Regulation No. 2016/679 of 27 April 2016 on the protection of natural persons

with regard to the processing of personal data and on the free movement of such data (“GDPR”), JFML as data controller may collect, store and process, by electronic or other means, the data supplied by the Client, his/her/its representatives, authorized agents, proxy holders or beneficial owners (the “Data Subjects”).

This Data Privacy Notice provides you with an overview of the way JFML handles Personal Data as defined below and ensure the protection thereof.

WHAT PERSONAL DATA IS PROCESSED?

The data processed may include in particular the name, contact details (including postal and email address), ID documents, account details, invested amounts of the Data Subjects (the “Personal Data”). Personal Data are collected directly from the Data Subject. Personal Data such as identification documents may also be collected by other means, such as online search engines (Pythagoras, World-Check, etc.) and other third party databases relevant for the activity of JFML. JFML also records telephone conversations and electronic communications.

WHY IS PERSONAL DATA PROCESSED?

The processing of Personal Data by JFML is necessary for the performance of the contractual relationship between JFML and the Client, in particular to manage Client relationship, to manage and administer investors’ holdings, to manage JFML’s products and related services, to process subscription, redemption or conversion orders, to prevent abuses and frauds, to secure communication channels, to carry out statistics and tests, to manage risks, to manage litigation and to develop commercial offers. Personal Data is also processed by JFML for the purpose of complying with its legal obligations, notably with applicable anti-money laundering and counter terrorist financing rules, and with applicable national and international sanctions lists and embargos.

ON WHICH LEGAL BASIS IS PERSONAL DATA PROCESSED?

The processing of Personal Data by JFML will be, as explained above, performed where such processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at

the request of the Data Subject prior to entering into a contract and for compliance with a legal obligation to which JFML is subject.

The processing of Personal Data is also necessary for the purposes of the legitimate interests of JFML (except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject), where such processing is not necessary for the performance of a contract or for compliance with a legal obligation but is nevertheless necessary in the normal course of JFML's business (e.g. the transmission of information to its affiliates for internal administrative purposes, the management of risks and IT systems, to maintain contact with the Data Subject or to develop JFML's services).

TRANSFER OF PERSONAL DATA TO THIRD PARTIES

Personal Data will not be transferred to any third parties, except to those designated by the Client and to entities required for the performance of the processing of Personal Data for the aforementioned purposes. To this end, JFML may transfer Personal Data to its data processors, including external service providers, auditors, legal advisors or affiliates of JFML (the "Recipients"), in order to provide the services required by the Client. The Recipients are located in the European Union or in countries outside of the European Union ensuring an adequate level of protection of personal data, but also in countries that are not deemed to offer an adequate level of protection by the European Commission. Those transfers of Personal Data are necessary for the performance of the contractual relationship with the Client. JFML and the Recipients concerned have or will put in place appropriate safeguards, such as contractual arrangements, for the processing and transfer of Personal Data. Further information relating to these safeguards is available upon request.

TRANSFER OF PERSONAL DATA TO AUTHORITIES

To the extent required by applicable law, Personal Data may also be transferred to judicial and/or administrative authorities. In accordance with applicable legal and regulatory tax provisions pertaining to the automatic exchange of information, 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.

PERSONAL DATA RETENTION PERIOD

Personal Data will be stored for as long as they are required for the purposes described above, or to comply with applicable laws and regulations.

YOUR RIGHTS IN RESPECT OF YOUR PERSONAL DATA

Each Data Subject has the right to access his/her Personal Data and may ask such Personal Data to be rectified when they are inaccurate or incomplete. Subject to the conditions set out under the Data Protection Law, each Data Subject also has the right to be informed and to object to the processing of such Personal Data, to ask for erasure of such Personal Data, to ask for data portability and for the limitation of processing of such Personal Data. In relation thereto, the Data Subject may exercise the above rights by writing to JFML at its registered office (see contact details below).

The Data Subject also has the right to lodge a complaint with the Luxembourg Data Protection Authority (Commission Nationale pour la Protection des Données, <https://cnpd.public.lu/en.html>).

CONTACT DETAILS

For any question, comment or concern, please feel free to contact JFML:

Japan Fund Management (Luxembourg) S.A.

To the attention of the Conducting Officers

Address: 1B, rue Gabriel Lippmann, L-5365 Munsbach, Grand Duchy of Luxembourg

Tel: +352 276 920 1

Fax: +352 276 920 440

Online contact form: <https://www.jfml.lu/contact.html#message>