

Personal data protection policy

"Privacy Policy"

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1. Introduction

The aim of this Policy ("Privacy Policy") is to explicitly present to you the way how Degroof Petercam Asset Management ("DPAM") processes the personal data of its customers and its potential future customers or of natural persons linked to DPAM, such as a proxy holder, a shareholder, an employee, a consultant or a beneficial owner, a contact person, the user of a DPAM website or the representative of a legal entity ("Data").

Data protection is of the utmost importance to DPAM and, through this Privacy Policy, we seek to provide you with a transparent overview of our policies and practices in this field. We invite you to read the information in this Privacy Policy carefully so that you can clearly understand for what purposes DPAM uses the Data.

In accordance with applicable laws and regulations, this Privacy Policy shall thus only apply to the Data that allow for a natural person to be identified directly or indirectly. It supplements the provisions of the General Conditions of DPAM and the specific agreements between you and DPAM.

You will, for example, find in this document more detailed information about your personal data protection rights and about how you can exercise these rights.

Your Data shall be processed in accordance with the applicable laws and regulations, and in particular with Regulation (EU) 2016/679 of the European Parliament and of the Council 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") and the related Belgian laws.

It is important to note that if you provide DPAM with Data about someone other than yourself (for example, one of your employees), you must ensure that those persons are aware of the existence of this Privacy Policy, they understand how their Data is processed and that they have authorised you to transmit their Data to DPAM.

If you require additional information about data protection, you can obtain this from the Data Protection Authority ("*Autorité de protection des données*") at **www.dataprotectionauthority.be**.

DPAM reserves the right to amend this Privacy Policy in order to take into account the most recent practices. The latest version of the Privacy Policy will always be available on the website of DPAM: **www.funds.degroofpetercam.com** and **www.mypam.com**. We will notify you of any major change through the usual communications channels.

2. Who is responsible for processing the Data?

The entity responsible for processing the Data is the company limited by shares ("*société anonyme*", abbreviated into "SA") Degroof Petercam Asset Management with registered office in Belgium, rue Guimard 18, 1040 Brussels and registered in the Brussels Register of Legal Entities under VAT number 0886 223 276.

DPAM is a management company belonging to the Degroof Petercam Group. Degroof Petercam is held by family shareholders who have committed themselves for the long term and which offers its services to private and institutional investors.

DPAM is accountable to the supervisory authorities that oversee compliance with Data regulations. DPAM determines the purposes for which the Data is processed, as well as the means used and all of the features of the processing, as explained in this Privacy Policy.

3. When is your personal Data collected?

The Data may, for example, be collected by DPAM:

- when you become a customer of DPAM or throughout your relationship with us;
- when you show an interest in our services and products by contacting us via the channels available to you or when you use them;
- when you submit a duly completed form to us;
- when you use our online services or when you are appointed by your employer as authorised user of one of DPAM's dedicated websites;
- when you subscribe to our newsletters or to any other publications;
- when DPAM provides services related to a fund and that DPAM must in this context interact with service providers;
- when you answer our invitations to events organised by DPAM;
- if visiting our offices and when you are filmed by our surveillance cameras;
- when you publish the Data on social networks or freely accessible websites;
- when DPAM purchases or rents databases managed by professional database providers;
- when your Data is published or transmitted by authorised third parties (Belgian State Gazette ("*Moniteur belge*"), agents or brokers, companies belonging to our group) or in the press.

4. For what purposes does DPAM process the Data?

DPAM shall collect and process your personal Data for the purposes described below.

DPAM defines itself the below purposes based on the needs of its activities and ensures that only the Data necessary and relevant for a specific purpose is processed.

DPAM may collect the Data directly on the basis of a direct contractual relationship with you or indirectly on the basis of a legal or regulatory obligation as further explained below.

As a general rule, DPAM processes the Data in situations imposed or authorised by the laws or regulations, i.e.:

- 4.1 to comply with the legal and regulatory requirements imposed on DPAM;
- 4.2 during pre-contractual steps prior to you becoming a customer of DPAM;
- 4.3 to allow the performance of the contract between you and DPAM;
- 4.4 for reasons that pertain to the legitimate interest of DPAM;
- 4.5 for reasons that pertain to the legitimate interest of DPAM in using specifically direct marketing practices;
- 4.6 in case of a specific request and based on clear and unequivocal information, when we secure your consent to send electronic communications.

4.1 COMPLIANCE WITH LEGAL AND REGULATORY PROVISIONS

As management company, DPAM is required to comply with a number of legal and regulatory obligations that impose specific processing of the Data. This processing may require the communication of the Data to the competent national, European or foreign supervisory, judicial or administrative authorities, as well as to the different entities of the Degroof Petercam Group or to third parties. We will obviously ensure that the Data is transmitted only if, and to the extent that, DPAM is required to comply with such obligations. You can obtain more information about the legal and regulatory obligations imposed on DPAM by following the procedure further described in Article 10 of this Privacy Policy.

You will find below a non-exhaustive list of the legal and regulatory fields within which DPAM has to process your Data.

The list may evolve with time:

Comply with:

- the applicable rules relating to embargoes decided by the competent Belgian, foreign or international authorities, whether these decisions relate to individuals, organisations or nationals of certain countries. This can be achieved, for example, by identifying the relevant persons and assets;
- the rules relating to financial, tax, fraud or incidents reporting to the prudential supervisory authorities.

Contribute to:

- fight and prevent the financing of terrorism and the laundering of money by determining the profile, identifying the customers, their representatives and beneficial owners, as well as monitoring their operations and transactions;
- fight market abuse by detecting and reporting any abuse of privileged information, market manipulation and suspicious transactions;
- combating tax fraud and evasion in conjunction with the competent authorities by identifying the customers, their accounts and their contracts.

Communiate:

- with the various prudential, tax and judicial authorities in response to official requests;
- with the various competent privacy protection supervisory authorities in response to official requests or when required by regulations;
- to the various providers of financial products and services or payment services information relating to the accounts, transactions and their respective beneficiaries or issuers.

Proceed to:

- identify, with a view to protecting the investor, appropriate or adequate financial products and services depending on his/her profile, the investor category, his financial capacities and creditworthiness and his investment goals.
- record certain telephone conversations and electronic communications.

4.2 PRE-CONTRACTUAL STEPS PRIOR TO YOUR BECOMING A CUSTOMER OF DPAM

Prior to conclusion of a contract, regardless of the means of communication used and made available by DPAM, DPAM must analyse your application in order to assess whether the envisaged contract can indeed be concluded.

Within the framework of this analysis, DPAM will process the Data related to your application and, among other things, determine the conditions under which the contract could be concluded.

This situation could occur, for example, when you request to enter into a collective or discretionary portfolio management agreement.

DPAM reserves the right not to conclude a contract should the requested information not be provided.

4.3 CONTRACTS BETWEEN DPAM AND ITS CUSTOMERS

Within the framework of performance of the contracts between DPAM and its customers, as well as contracts that have been terminated, regardless of the communication channels used, DPAM can and, in certain cases, must obtain and process the Data of its customer for the following reasons:

- compliance with the administrative and accounting obligations of DPAM;
- to be assured of providing a quality service to the customer;
- verify the identity of the customer and ensure that the assets of the customer are protected against any fraudulent activity;
- the signing and execution of any contract between DPAM and its customer or any other counterparty;
- advice and the sale of financial and investment products, as well as management of investment funds or of the customer's portfolio;
- consolidation and monitoring of accounting and financial data reporting.

When Data needed for the processing of your application or for the conclusion of a contract are missing, we will notify you as quickly as possible. If the missing Data are not provided, we reserve the right not to take your application any further.

In the process of performing these different tasks and in order to provide an optimal service, DPAM must transmit or share the Data within its various internal departments.

DPAM may have to process Data for additional purposes within the framework of the performance of its contracts and, more generally speaking, its relations with its customers.

4.4 LEGITIMATE INTERESTS OF DPAM

While ensuring that a fair balance is maintained and taking due account of your rights and freedoms, including your right to the protection of your privacy, DPAM shall process the personal Data in order to pursue its legitimate interests.

In this context, DPAM will always try to limit the impact of the processing of the Data in order to maintain a balance.

If, despite this, you object to this processing, you can exercise your right of objection pursuant to the conditions and limits described in Article 9.4.

Personal data are thus processed for the purpose of:

- personalising our services;
- studying and analysing the market and the competition in order to better position ourselves in respect of the latter;
- analysing and managing risks and making actuarial or statistical calculations;
- managing complaints or disputes;
- filing and evidential needs;
- preventive and operational management of physical and IT security;
- preventing and combating fraud, abuse or other infringements;

- coordinating customers and groups of customers in order to increase synergies and general efficiency within DPAM;
- using cookies, which are necessary for browsing our website and other platforms at your disposal.
- improving the operational functioning of DPAM, the quality of its service and its processes, including:
 - via surveys and statistics and by analysing the comments posted on various platforms and social networks (Twitter LinkedIn, Facebook, Instagram, etc.);
 - through on-going training of our representatives, including based on the recordings of a number of telephone conversations;
 - through centralised customer management in order to establish more detailed profiles;
 - by developing segmentation operations based on individual or collective profiles, for example in order to improve our business relations management. This situation could, for example, occur when we make a distinction between "individual" and "business" profiles.

4.5 LEGITIMATE INTEREST OF DPAM IN DIRECT MARKETING PRACTICES

DPAM will process the Data for segmentation purposes so that it can offer you tailored and personalised products or services that are suited to your professional or personal situation and that take account of your relationship with DPAM.

This processing may be performed when DPAM:

- assesses your socio-economic, demographic or family situation and identifies, for example, the key periods during which specific products or services could be offered to you;
- analyses your behaviour displayed via the various physical (contacts in the branch offices or at certain events) and online communication channels (via our websites, our mobile application, our MY DPAM platform or via social networks);
- analyses the effectiveness of its advertising and marketing campaigns;
- tailors the content of certain online communication channels to your behaviour or adjusts it after analysing our advertising and marketing campaigns;
- assesses your areas of interest and your customer purchasing behaviour;
- improves the use of the forms or channels of communication made available to you by automatically completing certain information obtained beforehand and by then asking you to confirm them;
- prepares personalised product and service offers;
- sends out personalised advertising by post or contacts customers directly by telephone.

When developing its personalised products and services, DPAM also feeds its database with data provided by external specialist companies.

4.6 YOUR CONSENT TO ELECTRONIC COMMUNICATIONS

After specifically requesting your consent, DPAM may process your personal Data, including your mobile phone number and your email address, so that it can send you invitations to events and advertising or personalised offers as part of its direct marketing activities or via newsletters.

If you no longer wish to receive electronic communications, DPAM gives you the possibility at any time to object to this processing of your Data. For more details, please refer to section 9 of this Privacy Policy, which describes the Data processing rights, as well as to section 10, which explains how to exercise the rights.

5. What type of Data does DPAM process?

DPAM process different types of Data and in particular Data related to any of the categories listed below.

DATA CATEGORIES	EXAMPLES
Your identification Data	Surname and first name, sex, date and place of birth, postal address, nationality, customer number, national ID number, tax residence, as well as the Data contained in your electronic identity card.
Your contact Data	Language, landline or mobile phone number, email address and more technical Data, such as: the IP address of your computer, the MAC address of a mobile device and, more generally speaking, the identification data relating to the devices you use to log on to our services.
Your personal and socio-demographic situation	Civil status, family or professional situation and its changes or key moments as well as your other relationships. Information about your academic back-ground or level of studies.
Your habits, preferences or areas of interest	Your habits and your preferences relating to your behaviour via various physical (contacts in branches or at certain events) and online communication channels (via our websites, our mobile application, our My DPAM platform or social networks). Your personal and lifestyle choices, your private and professional projects, etc.
Your overall financial situation	Your professional and personal situation, your solvency, your remuneration, the name of the employer, the origin of your assets or your funds, etc.
Banking, financial and transaction Data	Account numbers, investment products, etc.
Your investor profile	We are legally required to determine your investor risk profile before offering you any investment products and to give you advice on this matter. To this end, we assess your financial investment objectives, your financial situation, including your ability to sustain losses, your risk-taking tendencies, your actual knowledge and experience in the financial field.
Your level of satisfaction with our services	The various comments and suggestions that you may have made via the different channels of communication open to you or via social networks.

Audio-visual data	<p>We record your telephone conversations with the representatives of DPAM.</p> <p>We use video surveillance cameras and systems in strict compliance with the legal provisions.</p>
Some data from public sources or obtained from third parties	<p>The Data that has to be published by law or at the request of an authority (Belgian State Gazette ("<i>Moniteur Belge</i>"), Belgian National Bank ("<i>Banque Nationale de Belgique</i>"), the FSMA ("<i>Autorité des Services et Marchés Financiers</i>"), Crossroads Bank ("<i>Banque-Carrefour</i>"), etc.) or transmitted by a public institution, such as the tax administration, the courts or the public prosecutor's office.</p> <p>The Data that you have decided to make publicly accessible on open networks (website, blog, social networks) or that are obtained from press publications. Data transmitted by professional data providers.</p> <p>If you wish to receive more information on data collected from public sources or obtained via third parties, you can contact us via the various channels of communication made available to you in article 10 of this charter.</p>
Data collected from cookies	<p>We use cookies, i.e., small text files created by a programme on DPAM's server and stored on the hard drive of the user's device. They can perform various roles: saving your preferences, collecting statistical data, tailoring the website content and/or advertising to your needs.</p>

In accordance with the law, DPAM shall not, as a matter of principle, process the Data relating to specific categories, i.e., those relating to your race or ethnic origin, your political opinions, your religion or your philosophical beliefs, your membership of a trade union, your health or your sex life, or Data relating to any criminal convictions and misdemeanours. No genetic or biometric Data shall

be processed or used by DPAM as part of its product or service offers. Should we have to process this type of Data, we shall do so in compliance with the terms and requirements of the law and shall notify you specifically beforehand of the purposes of this processing.

6. With whom does DPAM share your Data?

Within the framework of the aforementioned purposes, DPAM may communicate the personal Data to the recipients listed below.

6.1 WITHIN THE DEGROOF PETERCAM GROUP

DPAM may communicate the Data to the employees of DPAM, to the companies affiliated to DPAM located in Belgium and abroad, as well as to their employees.

DPAM and its affiliated companies may exchange and centralise the Data in order to ensure optimal management of their services and their product offer or in order to maximise synergies at group level, particularly within the framework of its common policy of risk assessment, customer acceptance and overall vision of its customer base or as part of combating fraud and money laundering.

To get more information about the Degroof Petercam Group and its affiliated companies, you can consult our website at the following address: <https://www.degroofpetercam.com>.

6.2 OUTSIDE DEGROOF PETERCAM

A. Supervisory authorities and public authorities

DPAM is required by the applicable regulations to communicate some Data (information or documents about its customers, its beneficial owners, its accounts and the transactions that has made) to supervisory authorities and public authorities, such as:

- public authorities, national and international regulators, supervisory authorities, tax authorities or other foreign, European or international counterpart authorities;
- any judicial or administrative authority generally speaking;
- DPAM may, for example, be required, pursuant to foreign laws (especially US law), to communicate, upon the request of the local authorities (supervisory authorities, such as the Commodity Futures Trading Commission or the Securities & Exchange Commission), all of the details relating to the transactions within their competence, including the name of the relevant customers and/or their Tax Identification Number (for the United States). We shall always ensure that we limit the transmission of your Data and only do so if, and to the extent that, DPAM is required to transmit them.

B. Subcontractors and specialist third parties

DPAM may decide to communicate your Data to third party entities in cases where DPAM decides to subcontract certain services to specialist third parties or if a legitimate interest justifies this.

The communication of the Data within this framework always takes place within the limits that are strictly necessary for the provision of these subcontracted services. We also pay particular attention to the choice of these specialist third parties. DPAM always ensures that it obtains security and confidentiality commitments from its subcontractors when they process your Data by ensuring that access to your Data is limited and that they are protected by appropriate technical and organisational measures. DPAM shall also check that the processing is done in conformity with the instructions communicated by it to its subcontractor.

Based on the foregoing, DPAM currently shares your Data for purposes that include the following:

- organisation of advertising and direct marketing campaigns;
- management of disputes by law firms or bailiffs;
- creation and maintenance of DPAM's IT tools and applications;
- marketing of its activities;
- organisation of events;
- management of customer communication;
- regulatory reporting;
- settlement of financial transactions. By way of an indication, DPAM makes available a non-exhaustive list of its partners:
 - Swift: for the exchange of messages within the framework of secure financial transactions;
 - the depository and sub-depositaries of financial instruments and products;
 - Euroclear and CEC: within the framework of their payment and share transaction clearance and settlement activities.

C. DPAM as a subcontractor

This Policy only relates to the activities of DPAM in its capacity as data controller.

Even though this Privacy Policy only relates to the activities of DPAM in its capacity as the data controller, we draw your attention to the fact that DPAM is also a subcontractor for third parties within the framework of some of its relations with commercial partners.

6.3 DATA TRANSFER OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

As a result of our activities, DPAM may have to communicate Data outside the EEA.

To this end, DPAM shall not communicate the Data to countries that do not guarantee an adequate level of protection in the cases stipulated in the General Data Protection Regulation (GDPR). DPAM shall therefore take all adequate steps to guarantee that your Data is duly protected in the country of destination by ensuring, for example, that the protection of personal Data is guaranteed by suitable contractual provisions or by any other means that provides an adequate level of security.

7. For how long will the Data be kept?

DPAM keeps the data for the time required to the accomplishment of the specific purposes for which the Data was collected, but also to fulfill its legal and fiscal obligations, for proof related matters is to carry out internal audits or to answer to requests for information from the competent authorities.

Here are a few examples:

- the retention of Data relating to a prospective customer is of five years except in case of an additional contact with the latter, which would cause a new period of five years to start as of the day of the last contact;
- Data relating to an account is usually retained for ten years after it has been closed;
- Data relating to the recording of telephone conversations during which the customer gives instructions to DPAM relating to the performance of a contract are retained for seven years as of 1 January of the year following the end of said contract.

8. Data security

DPAM takes the necessary steps, including of an organisational and technical nature, to ensure the confidentiality, integrity, availability and robustness of the Data, the processing systems and services under its control and the security of their treatment pursuant to the legal requirements.

Our staff shall only access the Data if it is relevant to the performance of their missions. Our employees are thus bound by strict professional secrecy and must respect the confidentiality of the Data. Our offices, as well as access to our servers and networks, are tightly protected and we take great care when choosing our commercial suppliers and partners in order to ensure that any transfer or processing of Data by them is fully secure.

DPAM also establishes technical protection measures in order to offer an ever-higher level of security for your Data. These measures may entail the encryption of the Data and the installation of firewalls or anti-viruses.

You can help us to secure the Data by following this advice:

- always perform updates on your browser or your mobile applications;
- never switch off the security features on your devices;
- make sure that a firewall is installed on your devices in order to continuously monitor the incoming and outgoing information flows;
- install a good anti-virus programme and make sure it is kept updated;
- secure your Wi-Fi connection;
- do not choose overly simple passwords (such as 111111 or 12345), or overly common passwords (such as 'password') or which refer to personal information (date of birth, etc.);
- do not communicate your confidential passwords to third parties (including members of your family or your friends) and never let third parties use them;
- report any potential fraud or misuse.

9. What are your rights?

You have the following rights in respect of the processing of your Data.

9.1 RIGHT TO ACCESS AND RECEIVE YOUR DATA

You can consult your Data and ask us for the following information: whether we are processing your Data or not; the purposes for which your Data are being processed; the various categories of Data that are processed; the recipients to whom they are communicated and how we obtained your Data. This right can be exercised subject to the Data already being available via other channels and subject to the observance of third party rights.

This right thus gives you the possibility to ask DPAM to provide you with the Data that it holds pertaining to you in a structured format that is accessible and machine-readable when the processing is automated.

9.2 RIGHT TO RECTIFY YOUR DATA

You can also ask us to rectify your Data when you see that they are incomplete or contain errors.

In order to keep your Data fully up-to-date and to provide you with a quality service, please notify us of any change (a change of address, renewal of your identity card, for example).

9.3 RIGHT TO DELETE YOUR DATA

You can ask DPAM to delete your Data or render them unusable depending on the reasonable technical means at its disposal.

Nonetheless, DPAM may refuse to perform this operation when it needs to continue to process your Data on compelling grounds, including when they are required by DPAM in order to meet its legal obligations, for evidential purposes in order to keep a copy of the transaction history or in order to perform its contractual obligations.

9.4 RIGHT TO OBJECT TO THE PROCESSING OF YOUR DATA

You have the right to object to the processing of your Data by DPAM when this processing is based on a legitimate interest of DPAM. DPAM may, however, refuse this request on compelling grounds, particularly if the processing of the Data is needed, for example, for the purpose of preventing fraud.

We also draw your attention to the fact that your objection to the processing of your Data for purposes other than direct marketing may lead to DPAM terminating its contractual relationship with you or refusing to perform an operation.

9.5 RIGHT TO WITHDRAW YOUR CONSENT

It is possible to withdraw at any time the consent given to DPAM to process your Data. However, unless you terminate the contract between you and DPAM, DPAM may, after balancing your interests and its own interests, continue to process some of your Data.

You may submit your request via the different communication channels placed at your disposal by DPAM. You may also change your mind via these same means of communication.

Notwithstanding the foregoing, the exercise of your right of objection does not preclude DPAM from contacting you for reasons other than those stipulated above and, more precisely, in relation to a legal obligation or in order to perform a contract.

9.6 RIGHT TO DATA PORTABILITY

When we process your Data with your consent or within the framework of a contract, you have the right to request that your Data be transmitted directly to another data controller when this is technically feasible for DPAM.

9.7 RIGHT TO LIMIT THE PROCESSING OF YOUR DATA

You have the right to ask for the processing of your Data to be limited in certain specific cases.

9.8 RIGHT TO OBJECT TO COMMUNICATIONS FOR ADVERTISING PURPOSES (DIRECT MARKETING)

You may object, at no cost and on request, to the processing of your Data for direct marketing purposes.

When you exercise this right, DPAM shall cease to canvass business by sending advertisements to your email or postal address or to your telephone depending on your request. Your request shall be processed as quickly as possible.

10. How can you send us a request relating to the Privacy Policy?

10.1 GENERAL REQUEST

Any request relating to the exercise of your rights can be submitted to DPAM in writing at any time and at no cost.

You merely need to send us a signed, dated and clearly and precisely formulated request. We require you to attach a copy of your identity card in order to ensure that your rights are not being exercised by a person other than yourself. We reserve the right to contact you directly in order to verify the authenticity of this request.

You can make this request by following any of the following alternatives:

- by post by addressing a courier to our data privacy officer ("DPO"), accompanied by a copy of your identity card, to the following address:

Degroof Petercam
C/o Data Privacy Officer
Rue de l'Industrie 44
1040 Bruxelles

- by sending an email, accompanied by a copy of your identity card, to the following address:
dataprivacy@degroofpetercam.com

10.2 REQUEST RELATING TO DIRECT MARKETING ACTIVITIES

You may submit your request via the different means of communication placed at your disposal by DPAM. You may also change your mind via these same means of communication:

- By clicking on the "unsubscribe" link in one of the emails or e-newsletters sent by DPAM;
- By post, by addressing a courier to our data privacy officer ("DPO"), accompanied by a copy of your identity card, to the following address:

Degroof Petercam
C/o Data Privacy Officer
Rue de l'Industrie 44
1040 Bruxelles

- By sending an email, accompanied by a copy of your identity card, to:
dataprivacy@degroofpetercam.com

10.3 RIGHT OF COMPLAINT

In the event of a dispute relating to the processing of your Data, you can write to DPAM at the following address:

- By post to:
Degroof Petercam Asset Management S.A.
Operational Risk Management
Rue de l'Industrie 44
1040 Brussels
- By email to:
claims@degroofpetercam.com

You may submit a complaint to the Data Protection Authority:

- By post to:
the Data Protection Authority
rue de la Presse 35
1000 Brussels
- By email to:
commission@privacycommission.be
- By telephone at: +32 2 274 48 00



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