

ZURICH INVESTMENT SERVICES (UK) LIMITED - DATA PROTECTION NOTICE

This notice sets out how Zurich Investment Services (UK) Limited [ZISUK] will process personal information (as a Data Controller)

Where your details are provided to ZISUK as a consequence of your investment in ZISUK, then ZISUK, acting as a data controller may itself (or through a third party such as Northern Trust Global Services PLC (the “**Administrator**”) acting in its capacity as the ZISUK’s administrator) process your personal information or that of your directors, officers, employees and/or beneficial owners. When processing your personal information, there may also be times where the Administrator will act as a data controller. In connection with this, please note the following:

Personal data we may collect from you

The type of personal information we will collect includes; basic personal information (i.e. name, address and date of birth), occupation and financial details, health and family information, claims and convictions information.

We will collect and process the personal information that you give us by phone, e-mail, filling in forms, including on our website, and when you report a problem with our website. We also collect personal information from your appointed agent such as your trustee, broker, intermediary or financial adviser in order to provide you with the services you have requested and from other sources, such as credit reference agencies and other insurance companies, for verification purposes. We will also collect information you have volunteered to be in the public domain and other industry-wide sources.

Purposes of Processing and Legal basis for processing

Your personal data may be processed by ZISUK or the Administrator (or any of their affiliates, agents, employees, delegates or sub-contractors) for the following purposes:

- to facilitate the opening of your account with ZISUK, the management and administration of your holdings in ZISUK and any related account on an on-going basis (the “**Services**”) which are necessary for the performance of your contract with ZISUK, including without limitation the processing of redemption, conversion, transfer and additional subscription requests and the payment of distributions;
- in order to carry out anti-money laundering checks and related actions which ZISUK considers appropriate to meet any legal obligations imposed on ZISUK relating to, or the processing in the public interest or to pursue ZISUK 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 ZISUK and the Administrator's anti-money laundering 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 (i) processing and verification of instructions, (ii) investigation and fraud prevention purposes, (iii) for crime detection, prevention, investigation and prosecution, (iv) to enforce or defend ZISUK and its affiliates', itself or through third parties to whom it delegates such responsibilities or rights in order to comply with any legal obligation imposed on ZISUK, (v) to pursue ZISUK's legitimate interests in relation to such matters or (vi) where the processing is in the public interest;
- to disclose information to other third parties such as service providers of ZISUK, auditors, regulatory authorities and technology providers in order to comply with any legal obligation imposed on ZISUK or in order to pursue the legitimate interests of ZISUK;
- to monitor and record calls for quality, business analysis, training and related purposes in order to pursue the legitimate interests of ZISUK to improve its service delivery;
- to update and maintain records and fee calculation;
- to retain AML and other records of individuals to assist with the subsequent screening of them by the Administrator including in relation to other funds or clients of the Administrator in pursuance of the Administrator's and its clients' legitimate interests;

and which are necessary to comply with ZISUK or the Administrator's legal obligations and/or which are necessary for ZISUK or the Administrator's legitimate interests indicated above and/or the processing is in the public interest.

Storage of Data, Recipients of Data and International Transfer of Data

The data that ZISUK and the Administrator collect from you is hosted and stored within the European Economic Area ("EEA"), provided however that it may be transferred outside the EEA in certain circumstances as set out below.

ZISUK may disclose your personal information as follows:

- to its service providers, including the Administrator, and their affiliates, and other third party service providers engaged by ZISUK 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 third parties set out above may involve the transfer of data to the USA and other jurisdictions outside the European Economic Area in accordance with the requirements of the General Data Protection Regulation. Such countries may not have the same data protection laws as your jurisdiction. ZISUK has authorised the Administrator as its agent to put in place Standard Contractual Clauses with relevant parties to whom personal data will be transferred. Please contact the Administrator for copies of the Standard Contractual Clauses that have been entered into on behalf of ZISUK.

Unfortunately, the transmission of information via the internet is not completely secure. Although ZISUK and the Administrator will do their best to protect your data, neither of them can guarantee the security of your data transmitted to them electronically; any transmission is

at your own risk. Once ZISUK and the Administrator have received your information, they will use strict procedures and security features to try to prevent unauthorised access.

Retention period

ZISUK and the Administrator will retain your personal information for as long as required for ZISUK or the Administrator to perform the Services or perform investigations in relation to same depending on whether additional legal/regulatory obligations mandate that ZISUK retains your personal information.

In any event, ZISUK and the Administrator will not retain and store any personal data for longer than it is necessary for the above referred purposes.

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 (in certain specific circumstances).
- Right to request that your personal information is erased (in certain specific circumstances).
- Right to object to processing of your personal information (in certain specific circumstances).
- Right to data portability (in certain specific circumstances, namely to obtain and reuse your data for your own purposes across different services).

Where ZISUK or the Administrator requires your personal information to comply with AML or other legal requirements, failure to provide this information means ZISUK may not be able to accept you as an investor in ZISUK.

You have the right to lodge a complaint with a supervisory authority in the EU Member State of your habitual residence or place of work or in the place of the alleged infringement if you consider that the processing of personal data relating to you carried out by ZISUK or its service providers infringes the General Data Protection Regulation.

How to contact us

If you have any questions about our use of your personal information, please contact our Data Protection Officer at Zurich Insurance Group, Tri-centre 1, Newbridge Square, Swindon, SN1 1HN or by emailing at gbz.general.data.protection@uk.zurich.com.