

DATA PRIVACY NOTICE

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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 this website.

1. Introduction

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 ("GDPR") and on the free movement of such data (the "Data Protection Law"), **Mizuho Trust & Banking (Luxembourg) S.A.** (the "**Bank**"), 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 the Bank handles Personal Data as defined below and ensure the protection thereof.

2. What personal data is processed?

The data processed may include in particular the name, contact details (including postal and e-mail address), ID documents, banking 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 the Bank. The Bank also records telephone conversations and electronic communications.

3. Why is personal data processed?

The processing of Personal Data by the Bank is necessary for the performance of the contractual relationship between the Bank and the Client, in particular to manage Client relationship, to manage accounts and credit balances, to manage the Bank's products and related services, to execute banking operations of any nature, to prevent abuses and frauds, to secure communication channels, to carry out statistics and tests, to manage risks, to manage litigation and debt recovery, and to develop commercial offers. Personal Data is also processed by the Bank for the purpose of complying with its legal obligations, notably with applicable anti-money laundering and financing of terrorism rules, and with applicable national and international sanctions lists and embargos.

4. On which legal basis is personal data processed?

The processing of Personal Data by the Bank will be, as explained under section 3 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 the Bank is subject.

The processing of Personal Data is also necessary for the purposes of the legitimate interests of the Bank (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 the Bank'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 the Bank's services).

5. 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, the Bank may transfer Personal Data to its data processors, including external service providers, auditors, legal advisors or affiliates of the Bank (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. The Bank 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.

6. 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.

7. Processing by the Bank as fund administrator

The Bank, as fund administrator (the "Administrator"), may process personal data pertaining to investors in investment funds under its administration (the "Funds") received during the course of their investment (the "Investor Data"), for example to provide its services to the Funds or to discharge legal or regulatory requirements that apply directly to the Funds and/or the Administrator or in respect of which the Funds rely upon the Administrator, but such processing of Investor Data by the Administrator will always be compatible with at least one of the purposes for which we process Personal Data as described under section 3 above. The other obligations in respect of Investor Data applicable to the Administrator under GDPR as data controller and/or processor, as the case may be, apply in the same way as for Personal Data as described in other sections of this Data Privacy Notice.

8. Personal data retention period

Personal Data will be stored for as long as they are required for the purposes described under section 3 above or to comply with applicable laws and regulations.

9. Your rights in respect of your personal data

Each Data Subject has a right to access his/her Personal Data and may ask for such Personal Data to be rectified when it is inaccurate or incomplete. Subject to the conditions set out under the Data Protection Law, each Data Subject also has a 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 the Bank at its registered office (see section 10 below).**

The Data Subject also has a right to lodge a complaint with the Luxembourg data protection supervisory authority, the [National Commission for Data Protection](#) (CNPD).

10. Contacts us

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

Mizuho Trust & Banking (Luxembourg) S.A.

To the attention of the Data Protection Coordinator

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