

ODDO BHF AM PRIVACY POLICY

Introduction

In this Privacy Policy, "ODDO BHF AM", "we", "us" and "our" refer to the ODDO BHF Asset Management entities that may collect and process your personal data as data controller.

The list of ODDO BHF AM entities, with their respective contact details, can be found in Annex 1 of this Information Notice.

ODDO BHF AM specializes in fund management and has always cultivated trust with its clients. With this in mind, we have made the security and protection of your personal data a priority.

In particular, ODDO BHF AM undertakes to comply 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 (the "**GDPR**"), and the "ePrivacy Directive" of 2009/136/EC, as well as national regulations on the protection of personal data (hereinafter, together, "**the Regulations**").

About this Information Notice

The purpose of this information notice is to inform clients or prospective clients of ODDO BHF AM (including representatives, directors, officers or beneficial owners of prospective companies, clients or companies in a business relationship with ODDO BHF AM) about the processing of personal data that we implement, the sharing of such personal data and their protection, as well as the rights that you have in relation to such personal data.

ODDO BHF AM has appointed a Data Protection Officer (DPO) who can be contacted by post or e-mail at the addresses given in Annex 1 of this Information Notice.

1. What personal data are processed by ODDO BHF AM?

Personal data is any information relating to an identified or identifiable natural person. A natural person may be identified directly (surname, first name) or indirectly (telephone number or identifier, postal or e-mail address, etc.).

The personal data that may be processed by ODDO BHF AM, in whole or in part, are as follows :

- Information relating to your civil status and contact details: surname, first name, telephone number, address, e-mail address, professional details, company, position;
- Data relating to representatives of legal entities: identity of managers, partners, agents and beneficial owners;
- Identification data: nationality, date and place of birth, copy of an identity document;

- Information concerning the follow-up of the commercial relationship: letters, emails, telephone conversations;
- Information collected in the context of events: meetings, events, webinars, etc.;
- Data relating to your habits and preferences, in particular with regard to receiving marketing information;
- Data relating to the use of the website: authentication data to access the personal area, cookies, tracers, logs and navigation data. For more information on this point, please refer to the cookies policy on the website;
- Data relating to your tax status;
- Data collected as part of the fight against money laundering and the financing of terrorism (LCB-FT): identity of the beneficiary, income or turnover, proof of resources or assets, proof of the origin of funds, information on an account, a product or a financial transaction, identity of the originator, declaration of suspicion, etc...

Some personal data are provided directly by you, in particular when you subscribe to one of the funds marketed by ODDO BHF AM and as part of the follow-up of the commercial relationship. If you have subscribed to one of the funds marketed by ODDO BHF AM through a financial adviser or broker, some of the personal data listed above may be provided to us by the latter. If you do not provide the personal data we need to enable you to subscribe to one of our funds, we will not be able to process your subscription request.

Data may also be collected in connection with our anti-money laundering and anti-terrorist financing checks or when we are enforcing national or international financial sanctions.

You may have expressed your wish not to have your personal data used but we may still need to use it for various reasons. In such a case, we will continue to use it (i) if we are required to do so by law, (ii) if we need to perform a contractual obligation, (iii) or if there are compelling legitimate grounds for processing the data, or if the data are necessary for the establishment, exercise or defense of legal claims and, in any case, (iv) proportionate to the intended purpose.

2. Why does ODDO BHF AM process your personal data and on what legal basis?

The legal bases and purposes for which your personal data is collected and processed by ODDO BHF AM are as follows:

- (i) To perform a contract or to contact you, at your request, with a view to entering a contract:**
- o To facilitate the subscription to one of our funds (including investor and related party identification processes) and the administration of your holdings in that fund, including, without limitation, the processing of redemption, conversion, transfer and additional subscription requests, the payment of distributions, the processing of capital calls, and the production and dissemination of transaction and cash flow reports.
 - o Carrying out any communication to investors in relation to their investments in the fund;
 - o Performing accounting services for the fund, including the calculation of dividend distributions, redemption proceeds, amounts due from investors to the fund;
 - o In general, to fulfil contractual obligations arising for us.

(ii) To comply with a legal or regulatory obligation:

- Fighting money laundering and the financing of terrorism: your personal data are processed by ODDO BHF AM when it carries out checks to ensure that the assets invested in the funds are not from fraudulent sources and are not used to finance terrorist activities;
- Fighting tax evasion (FATCA - CRS): ODDO BHF AM may process data relating to your tax situation and, in certain circumstances, share this information, as well as other financial information relating to your interests in our funds, with the competent tax authorities;
- Compliance with MIFID II: your personal data are processed to determine your investor profile, including your risk appetite;
- Compliance with national and international financial sanctions: ODDO BHF AM may process your personal data as part of the checks it carries out to identify persons who should be subject to asset freezing measures;
- Your personal data may also be processed for the purpose of sending you regulatory communications or for the recording of telephone conversations to meet a legal requirement.

(iii) Where ODDO BHF AM pursues a legitimate interest which does not override your interests, freedoms and fundamental rights:

- To disclose information to other data recipients such as fund service providers and their affiliates, auditors, regulators and technology providers;
- To monitor and record electronic calls and communications (i) for fraud investigation and prevention purposes, (ii) for the detection, prevention, investigation and prosecution of crime, (iii) to enforce or defend the rights of the fund;
- Send you commercial communications in connection with existing products or services or for the further marketing of similar products or services (marketing);
- To protect the security and integrity of our IT systems;
- For the communication of information to legitimate third parties: lawyers, auditors, statutory auditors;
- For the processing of claims and litigation.

(iv) Consent:

In certain cases, your consent is necessary for us to be able to process your data, in particular:

- To carry out processing for purposes other than those described in the previous sections ;
- For commercial prospecting operations carried out by ODDO BHF AM with non-professional clients.

You may, at any time and without justification, object to the use of your data for commercial (marketing) prospecting purposes by ODDO BHF AM or by third parties. Where the legal basis for processing is consent, you may withdraw it by contacting us in accordance with the contact details given at the end of this policy.

3. Who are the recipients of your personal data and why is it shared?

Personal data transferred to public authorities:

In accordance with the Regulations in force, your personal data may be transferred at the request of public authorities.

Personal data transferred within the ODDO BHF Group:

ODDO BHF AM may communicate your personal data to other entities of the ODDO BHF Group whose intervention is necessary to fulfil the purposes described above.

Personal data transferred to ODDO BHF AM service providers:

ODDO BHF AM may also communicate your personal data to technical service providers and partners whose involvement is strictly necessary to achieve one of the above purposes.

ODDO BHF AM works with service providers who implement appropriate technical and organizational measures to ensure that the processing of personal data they carry out meets the requirements of the Regulation and guarantees the protection of your rights, confidentiality, and security of your personal data.

Personal data transferred to our partners:

ODDO BHF AM works with selected partners who may process your personal data and who act as data processors for their own purposes. These partners are:

- Fund distributors
- Fund custodians
- Administrative and accounting managers

4. Are your personal data transferred outside the European Economic Area ("EEA")?

To provide its services, ODDO BHF AM may transfer your personal data to countries outside the EEA. These data transfers take place either to countries recognized by the European Commission as having a level of protection equivalent to that existing in the European Union or are based on one of the adequate safeguards provided for in Article 46 of the GDPR.

For example, teams at our Tunisian subsidiary, ODDO BHF Tunis, may access your personal data remotely to manage and administer our IT infrastructure and applications. This transfer is governed by standard contractual clauses approved by the European Commission.

In all cases, ODDO BHF AM implements appropriate measures to ensure the security and confidentiality of your personal data, such as encryption of your personal data.

5. How long does ODDO BHF AM keep your personal data?

ODDO BHF AM will keep your personal data only for as long as is necessary to fulfil the purposes set out in this Information Notice and will destroy, anonymize or archive it once it is no longer required to fulfil these purposes, unless the retention of such data is necessary to comply with legal or regulatory requirements or is justified by the need to assert one's rights in the context of legal proceedings, investigations or similar procedures.

It is also worth remembering that personal data collected and processed for the above-mentioned purposes may be kept for a longer period than that initially envisaged if the defense of a right or interest so requires, or in order to meet the requirements of public authorities, a local or international regulator.

In this case, the personal data will only be accessible to authorized persons.

6. How does ODDO BHF AM protect your personal data?

ODDO BHF AM ensures to minimize the collection of personal data to the strict necessary, to keep it up to date and to ensure its security. Technical and organizational measures are implemented to guarantee the appropriate protection of your data against any access, loss, accidental destruction, modification or unauthorized disclosure.

ODDO BHF AM staff and partners are trained on personal data protection issues and undertake to guarantee the confidentiality and security of the personal data to which they have access in the context of their tasks and missions.

In the event of a data breach affecting your personal data, presenting a risk for your rights and freedoms, ODDO BHF AM will notify the violation in question to the competent personal data protection authority within the time limits prescribed by the GDPR.

If this violation presents a high risk to your rights and freedoms, ODDO BHF AM also undertakes to:

- Notify you under the conditions prescribed by the GDPR;
- Provide you with the information and recommendations necessary to implement to remedy the situation.

7. What are your rights and how can you exercise them?

In accordance with the GDPR (articles 16 to 22), you have the following rights over your personal data:

- Right to have access to your personal data: this enables you to know whether the personal data are being processed and to obtain a readable copy of it. This right also allows you to check the accuracy of the data;
- Right of rectification of your personal data: this allows you to modify, correct or update your personal data in order to avoid the use or dissemination of erroneous data;
- Right to erasure of your personal data ("Right to be forgotten"): this right allows you to have your personal data erased whenever possible;
- Right to restrict the processing of your personal data: you can temporarily object to the use of your personal data;
- Right to object to the processing of your personal data: you may, at any time, object to their data being used for the purposes of commercial prospecting or for other purposes based on our respective interests. If your opposition request does not concern prospecting, ODDO BHF AM may justify its refusal on the grounds set out in Article 21 of the GDPR;
- Right to the portability of your personal data: this involves returning your data to you in a machine-readable format so that they can be transferred to a third party or for their own use.

The exercise of your rights is free of charge. However, in the event of manifestly unfounded or excessive requests, in particular because of their repetitive nature, we may demand the payment of reasonable costs.

8. On your right to lodge a complaint with the competent data protection authorities

Data subjects have the option of lodging a complaint with a data protection authority if they consider that the processing of their personal data does not comply with the Regulations.

You will find the contact details of the competent supervisory authority for the ODDO BHF AM entity concerned in Annex 1 of this Information Notice.

9. About the cookies policy

As part of the use of the Sites, cookies are deposited. The conditions of operation and use of these cookies are described in the Cookies Policy which can be consulted on the website.

ANNEXE 1

LIST OF ODDO BHF AM ENTITIES

Company name	Contact details of the Company's Data Protection Officer	Contact details of the competent data protection authority
<p>ODDO BHF ASSET MANAGEMENT SAS, a simplified joint stock company with a capital of EUR 21,500,000.00, registered with the Trade and Companies Register under the number 340 902 857.</p>	<p>DPO of ODDO BHF Asset Management SAS 12 Bd de la Madeleine, 75440 Paris Cedex 09 +33 (0)1 44 51 80 28 dpo@oddo-bhf.com</p>	<p>CNIL – Service des plaintes 3 Place de Fontenoy – TSA 80715 – 75334 PARIS CEDEX 07 Tél : +33 (0)1 53 73 22 22</p>
<p>ODDO BHF ASSET MANAGEMENT GMBH, a German limited liability company with a capital of EUR 10,300,00.00, registered with the Commercial Register of the Local Court of Düsseldorf under the number HRB 11971.</p>	<p>DPO of ODDO BHF Asset Management GmbH Herzogstraße 15 40217 Düsseldorf +49 (0) 211 239 24 01 datenschutz@oddo-bhf.com</p>	<p>BfDI - Graurheindorfer Str. 153 D – 53117, Bonn Tél : +49(0)228 997799 - 0</p>
<p>ODDO BHF ASSET MANAGEMENT LUX, a limited liability company incorporated under Luxembourg law with a capital of EUR 1,300,000.00, registered with the Luxembourg Business Registers under the number B29891.</p>	<p>DPO de ODDO BHF Asset Management Lux 6, rue Gabriel Lippmann L-5365 Munsbach Luxembourg +352 45 76 76 1 datenschutz@oddo-bhf.com</p>	<p>CNPD – Service des réclamations 15 Boulevard du Jazz L – 4370 Belvaux Tél : (+352) 26 10 60 - 1</p>