

Client Data Protection Notice

Public / Without Personal Data

Nomura values the personal information entrusted to us. This Client Data Protection Notice sets out, in accordance with the EU General Data Protection Regulation 2016/679 (the “General Data Protection Regulation” or “GDPR”), applicable from 25 May 2018, and any other local laws or regulations relating to data protection, the basis on which we will process any personal information collected from you or that you provide to us via email, via our websites or by other means.

As used throughout this Client Data Protection Notice:

- the terms “the Company”, “Nomura”, “we”, “us” or “our” refer to Global Funds Management S.A. and/or any related investment fund vehicle (or “Fund”);
- the terms “the Client” or “you” refer to each customer having a business relationship with the Company (including an investor in a Fund).

Terms defined in the General Data Protection Regulation shall have the same meanings when used in this Client Data Protection Notice.

1. The role of Nomura

The Company acts as data controller while managing the business relationship with the Client. As applicable, the Company or another Nomura company processes the Client’s personal data in accordance with its Nomura Group Privacy Policy, which can be viewed at <http://www.nomuraholdings.com/policy/privacy.html>.

For avoidance of any doubt with respect to investments in a Fund: the Fund can act as a data controller, while when the Fund is established as a mutual fund (*fonds commun de placement*), Global Funds Management S.A. is to be construed as the data controller.

2. Processing of your personal data

The Client is informed that:

- (a) The Company may, in connection with this Client Data Protection Notice or any investments or transactions entered into by the Company with the Client or for the Client, process personal data about the Client (if the Client is an individual), the Client’s employees and other individuals whose details the Client or a person acting on the Client’s behalf provide to the Company, including but not limited to contact details of individuals (such as telephone numbers and e-mail addresses) and personal identifiers, such as copies of identification documents (“Client Personal Data”) as described in sub-clauses 3 and 4;
- (b) The Client shall provide to the Company all relevant personal data required by the Company for the purpose of the Company’s compliance with any anti-money laundering laws, such as identification documents details for know-your-client (“KYC”) and anti-money laundering checks from time to time. Failure to provide this personal data could mean that the Company is unable to provide or to continue to provide services to the Client until such time as all relevant checks are completed; and
- (c) For the purposes of completing all relevant KYC and customer due diligence checks, the Company may obtain Client Personal Data from various sources (including publicly available sources) which may be included in the information the Company holds about the Client (or relevant employees).

- (d) In the event that you are identified as a Politically Exposed Person (PEP) as a result of any required screening process, you may be required to provide additional information and/or documentation to the Company or its service providers. Such processing, which may reveal your political opinion or other special categories of personal data will only occur in limited circumstances. The Company may notably process such type of personal data (i) which you have manifestly made public; or (ii) necessary for reasons of substantial public interest.

3. Purposes for processing of your personal data

The Company or another Nomura company may process the Client Personal Data for the following purposes:

- (a) For the provision of the services to the Client and the administration, operation and development of the Client's accounts, investments and transactions by staff from across the Nomura group acting on behalf of the Company or by Fund's service providers;
- (b) For the management of the Client's wider relationship with the Company and any entity of Nomura group;
- (c) For the prevention of money laundering or terrorist financing in accordance with the anti-money laundering laws and the conduct of all relevant customer due diligence or enhanced due diligence required by such regulations from time to time and beneficial ownership declarations as applicable;
- (d) For other credit control, fraud prevention and legal, tax or regulatory compliance purposes, including (without limitation) any KYC/AML or other background checks carried out in relation to the Client or a person connected to the Client, and/or tax reporting pursuant to CRS – FATCA rules (or other similar rules) as applicable; and
- (e) To provide further information to the Client in relation to the business or activities of the Nomura group from time to time.

In accordance with the General Data Protection Regulation, the Company confirms that it will process the Client Personal Data on the basis of either taking steps to enter into a contract or for the performance of a contract or for compliance with legal or regulatory obligations or for the Nomura group's or other third parties service providers' (as applicable) legitimate interests in providing services to the Client as the Company's client (including for the purposes of the prevention of fraud) and such other grounds for processing that apply to the Company's use of the Client Data from time to time in particular for establishing, exercising or defending the Company's legal rights or for conducting merger and acquisitions operations.

4. Sharing and transfer of your personal data

The Company may share the Client Personal Data with any entity within the Nomura group and service providers acting on the Company's behalf in order to provide the services to the Client (including where required for the purpose of the Nomura group's internal business management systems and internal controls) and where required, notably in case of tax reporting obligations or a court order, to regulators, governmental agencies, judicial authorities, beneficial ownership registers, and also to credit reference agencies and other organisations that help the Company and others to make credit decisions and reduce the incidence of fraud, but only to the extent reasonably required for the purposes set out in sub-clause 3.

The processing referred to in this Client Data Protection Notice may include transfers of Client Personal Data to countries outside the European Economic Area, which do not have data protection laws as strict as those in the Grand Duchy of Luxembourg. Where this is the case, we will put appropriate safeguards in place to protect the transferred Client Personal Data in accordance with the General Data Protection Regulation, including the use of standard contractual clauses or such other methods as the Company considers appropriate for such transfers.

You are informed that your personal data may be communicated to any Fund's financial manager located in Japan, a country benefiting from an adequate level of data protection pursuant to a decision from the EU Commission.

5. Your duties and rights

5.1 Within the limits set out in the GDPR, each Client as data subject can benefit from:

- (a) a right to know what personal data we process and a right of access to such personal data;
- (b) the right to request any incomplete or inaccurate personal data be corrected;
- (c) the right to object to our processing of the personal data where we send direct marketing;
- (d) the right to require us to delete the personal data and/or otherwise restrict our processing of personal data in some circumstances;
- (e) the right to object to our processing of some or all of the personal data on grounds relating to the data subject's particular situation which are based on legitimate interests, at any time (and require such personal data to be deleted). If the data subject objects, we shall no longer process the personal data unless we can demonstrate compelling legitimate grounds for such processing which override the data subject's interests, rights and freedoms or where it is necessary for the establishment, exercise or defence of legal rights; and
- (f) a "data portability" right to require us to transfer the personal data to the data subject or to a new service provider in a structured, commonly used and machine-readable format.

5.2 The Client shall:

- (a) Ensure that, before the Client or a person acting on the Client's behalf provide the Company with Client Personal Data relating to any individual, that individual has been given the information set out in this Client Data Protection Notice and informed that they have rights of access to, and correction or restriction of, their information, or to request that the Company erase their information or that the Company do not use their information to send to the Client marketing materials, which the Client may exercise by contacting the Company in writing;
- (b) Ensure that such information as is set out in sub-clause (a) above is provided to all those individuals whose information has already been provided to the Company for the purpose of any client relationship the Company has had with the Client under previous general terms and conditions or other applicable contractual documentation;
- (c) Provide the Company with such information as is necessary to keep the Client Personal Data accurate and up to date;
- (d) Immediately notify the Company of any notice of non-compliance with applicable data protection law which the Client receives and which may be relevant to the Company's processing of the Client Personal Data.

6. Contact and other information

If the Client has any concerns around the use of the Client Personal Data as provided in this Client Data Protection Notice Contact, it shall contact its usual contact at the Company at lux-gfm-data@lu.nomura.com.

The Client has the right to lodge a complaint with the Company in relation to our use of Client Personal Data in accordance with the Customer complaints & Investor rights document or with the relevant supervisory authority under the General Data Protection Regulation 2016/679 which is the National Commission for the Data Protection in the Grand-Duchy of Luxembourg.

7. Data Retention

The Company shall hold the Client Personal Data for such period as the Client is a client / investor of the Company or Nomura group or a Fund and/or for as long as is necessary for the relevant processing activity and otherwise in accordance with all relevant statutory limitative period or other regulatory requirements, including to establish, exercise or defend actual or potential legal claims and in the case of information provided under the anti-money laundering laws for such period specified from time to time in applicable AML laws.

Dated: July 2024