

**RBC Funds (Lux)**  
**Société d'Investissement à Capital Variable**  
**Société Anonyme**  
**14, Porte de France**  
**L-4360 Esch-sur-Alzette**  
**R.C.S. Luxembourg B.148.411**

**Notice to the Shareholders of the RBC Funds (Lux)**

**General Data Protection Regulation**

The purpose of this document is to provide you with information on our use of personal data that you make available to us. The term "Data Protection Laws" used throughout this document means the applicable Luxembourg data protection law and the Regulation 2016/679 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"). The terms "data controller", "data processor", "data subject", "personal data", "process" and "processing" shall be interpreted in accordance with the applicable Data Protection Laws.

In this document, "we", "us" and "our" refers to RBC Funds (Lux) (the "Fund") and its affiliates and delegates (including RBC Investor Services Bank S.A. ("RBC IS") in its capacity as registrar and transfer agent to the Fund) as the context requires and "you" and "your" refers to you as a Shareholder of the Fund (the "Shareholder"). For the avoidance of doubt this document is not intended to amend any existing contractual arrangements that we may have with you.

- (i) Where the Shareholder is a Natural Person (Individual)

Compliance. As part of our relationship with the Shareholder we will collect the Shareholder's personal data (including name, address, telephone number, email address and account data) and any further personal data collected in the course of the Shareholder's relationship with us (including, without limitation, any anti-money laundering, identification and verification documentation), either relating to the Shareholder or to any other person, partner, officer, director, employee, shareholder, ultimate beneficial owner or affiliate of the Shareholder or to any other data subject (the "Personal Data") and we undertake to process such Personal Data in accordance with the Data Protection Laws. In particular, we shall implement appropriate technical and organizational measures to ensure an appropriate level of security for the Personal Data. The Fund shall act as a data controller of the Personal Data and RBC IS shall act as a data processor of the Personal Data.

Purposes of the processing. The Personal Data shall only be processed for the following specific purposes (together, the "Purposes"):

- (i) for the performance of the Application and Account Opening Form or any other agreement entered into between the Shareholder and us;
- (ii) for account administration;
- (iii) for communication purposes, such as providing financial and other information to the Shareholder;
- (iv) for the maintenance and development of the business relationship with the Shareholder;
- (v) for compliance with the applicable laws, including anti-money laundering legislation.

The Personal Data will only be processed for the Purposes for which it was collected (as described above), unless otherwise permitted by applicable law or in accordance with Data Protection Laws, or otherwise with your consent.

Legal basis of the processing. The Personal Data will be processed by us, as well as by our employees, officers or agents, in relation to the activities contemplated in the Application and Account Opening Form or any other agreement entered

into between the Shareholder and us, or in the course of the Shareholder's relationship with us for achieving the specific purposes detailed hereunder. The legal bases upon which we will process the Personal Data are: (i) for the proper performance of the Application and Account Opening Form or any other agreement entered into between the Shareholder and us and in respect of the operation of the Fund; (ii) our legitimate business interests in relation to communicating with the Shareholder as necessary in connection with the Shareholder's affairs and generally in connection with the Shareholder's interest in the Fund; and (iii) for compliance with certain laws to which we are subject, as further specified below. The Personal Data may also be transferred or disclosed to our affiliates on the basis of such parties' legitimate interest for the purposes of maintaining global client records and providing centralized administrative services. The Shareholders may at their discretion refuse to communicate the Personal Data to us; in this event, however, we may reject the request for subscription in the Fund.

Recipients of the Personal Data. In order to achieve the above mentioned Purposes, we may transfer or disclose the Personal Data, to the following persons, including their employees, officers and/or agents (the "Recipients"):

- (i) our associated or affiliated companies;
- (ii) any of our service providers and sub-contractors, including our IT or data service providers, auditors, tax advisers or counsels;
- (iii) the regulatory authorities, including the tax authorities, when required by law.

Data transfers. Certain of the Recipients of the Personal Data may be located outside the European Economic Area (EEA), including to third countries or territories which do not ensure an adequate level of protection in the sense of article 45 of the GDPR ("Non-Equivalent Countries"). To the extent any transfer of Personal Data is made to a Recipient located in a Non-Equivalent Country, we shall provide for appropriate safeguards, such as the signing of standard data protection clauses between the data exporter and the data importer, in order to ensure that the rights of the Shareholder as a data subject are complied with, and that effective legal remedies are available. Where the Personal Data is transferred upon standard data protection clauses between the data importer and the data exporter, the Shareholders have the right to request copies of the relevant document for enabling the Personal Data transfer(s) towards Non-Equivalent Countries.

Storage limitation. The Personal Data processed by us shall be stored for no longer than necessary in relation to the Purposes of the processing (as described above), unless a longer retention period is required under applicable law. In any case, we undertake to delete the personal data at the latest 7 years after the relationship between you and us has ended, unless otherwise required by law.

Rights of the Shareholder. Upon written request addressed to us, the Shareholder may be given access to his/her Personal Data, require the rectification or erasure of his/her Personal Data, and/or exercise his/her right to data portability (i.e. obtain a copy of his/her personal data in a structured, commonly used and machine-readable format), within the limits and under the conditions laid down by the Data Protection Laws. The Shareholder may also object to, or request restriction of the processing, within the limits and under the conditions laid down by the Data Protection Laws. Furthermore, when consent has been given for the processing, the Shareholder can withdraw his/her consent at any time, in accordance with the Data Protection Laws. The right to withdraw consent shall however not affect the lawfulness of the processing based on consent prior to its withdrawal.

The Shareholder may address his/her requests to us by email at [DPO@RBC.com](mailto:DPO@RBC.com). When required or appropriate, we may request evidence of the identity of the Shareholder. We undertake to reply to any request within a reasonable time, in accordance with Data Protection Laws.

In the case of an issue relating to the processing of his/her Personal Data, the Shareholder has the right to lodge a complaint with the Luxembourg data protection supervisory authority (Commission Nationale pour la Protection des Données) or any other competent data protection authority.

(ii) Where the Shareholder is a Legal Person

In the case the Shareholder is a Legal Person providing personal data to us for the entering into and/or the performance of the Application and Account Opening Form or any other agreement entered into between the Shareholder and us, the Shareholder represents and warrants that: (i) all the personal data made available to us has been lawfully collected, processed and provided to us, in compliance with the Data Protection Laws; and (ii) such personal data is adequate, relevant, accurate, limited to what is necessary for the purposes described in this document, and, where necessary, up-to-date.

Where applicable, the Shareholder represents and warrants that it has obtained the fully informed, specific, unambiguous and freely given consent of the relevant individuals whose personal data is provided to us in accordance with the applicable Data Protection Laws, including for the transfer of personal data to Non-Equivalent Countries, as the case may be.

The Shareholder shall ensure that the data subjects concerned have been properly informed about the contemplated processing, the Purposes of the processing, the Recipients, the categories of personal data concerned, the possible transfer of their personal data outside the EEA, the storage period and their rights as data subjects, in accordance with and within the time limits set in Article 14 of the GDPR (each as described above).

In the case the Shareholder is a Legal Person, the Shareholder acknowledges that the Recipients of the Personal Data are located in various jurisdictions within and outside the EEA. The Personal Data may be transferred outside the EEA to Non-Equivalent Countries which may not have the same data protection laws for the purposes of carrying out the relevant investments, as well as compliance with any anti-money laundering legislation and as may otherwise be required to satisfy applicable laws. We, as well as our employees, officers or agents, have taken reasonable measures to ensure the security and confidentiality of the Personal Data transmitted to each of the Recipients concerned. However, the Shareholder acknowledges that due to the fact that the information is transferred electronically in some cases and made available in Non-Equivalent Countries, the same level of confidentiality and the same level of protection in relation to data protection regulation as currently in force in the EEA and Equivalent Countries may not be guaranteed while the information is kept abroad. In case the Shareholder is a Legal Person, the Shareholder hereby expressly recognizes that we and any of our employees, officers or agents, will accept no liability to the Shareholder with respect to any accidental or unauthorized disclosure, alteration or destruction of the Personal Data, except in the case of proven gross negligence or willful misconduct by us, our employees, officers or agents.