



## **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 in accordance with the EU data protection regime introduced by the General Data Protection Regulation (Regulation 2016/679, the "Data Protection Regulation" or "GDPR").

In this document, "we", "us" and "our" refers to RBC Global Asset Management (UK) Limited and its affiliates and delegates as the context requires (the "Investment Manager") and "you" and "your" refers to you as our client (the "Client"). For the avoidance of doubt this document is not intended to amend any existing contractual arrangements that we may have with you.

As a Client that provides us with personal data on individuals connected to you in relation to your investment with us (the "Individuals"), this will be relevant for those Individuals and you should transmit this document to such Individuals or otherwise advise them of its content.

Further, by continuing to provide us with personal data, you confirm that: (i) all the personal data made available to us has been lawfully collected, processed and provided to us, in compliance with the GDPR; (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 and (iii) you have obtained the fully informed, specific, unambiguous and freely given consent of the relevant Individuals whose personal data is provided to us in accordance with GDPR, including for the transfer of personal data to non-equivalent countries, as the case may be.

Compliance. As part of our relationship with you we will collect limited personal data relating to the Individuals; primarily name and business contact details. We undertake to process the personal data provided by you regarding the Individuals and any further personal data (the "Personal Data") collected in the course of the your relationship with us in accordance with the Data Protection Regulation. In particular, we shall implement appropriate technical and organizational measures to ensure an appropriate level of security for the Personal Data. We shall act as a data controller 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 agreement entered into between you and us;
- (ii) for account administration;
- (iii) for communication purposes, such as providing financial and other information to you;
- (iv) for the maintenance and development of the business relationship with you;
- (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 Regulation, or otherwise with your consent.

Legal basis of the processing. The Individual's Personal Data will be processed by us, as well as by our employees, officers or agents, in relation to the activities contemplated in the agreement entered into between you and us, or in the course of your relationship with us for achieving the specific purposes detailed hereunder. The legal bases upon which we will process the Personal Data are: (i) our legitimate business interests in relation to communicating with you as

necessary in connection with your affairs; and (ii) 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.

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.

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, 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.

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 Individuals. Upon written request addressed to us, the Individuals 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 Regulation. The Individuals may also object to, or request restriction of the processing, within the limits and under the conditions laid down by the Data Protection Regulation. Furthermore, when consent has been given for the processing, the Individual can withdraw his/her consent at any time, in accordance with the Data Protection Regulation. The right to withdraw consent shall however not affect the lawfulness of the processing based on consent prior to its withdrawal.

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

In the case of an issue relating to the processing of his/her Personal Data, the Individual has the right to lodge a complaint with the competent data protection supervisory authority (in the United Kingdom, the Information Commissioner's Office).