

Data Protection Notice (“Notice”)

AXA Investment Managers provide this Data Protection Notice (“Notice”) in the light of the requirements of the General Data Protection Regulation as transposed into UK law (“GDPR”) in order to alert clients and contacts to AXA Investment Managers data processing practices which will govern the processing of any personal data as defined under GDPR.

AXA Investment Managers is the Data Controller and is committed to protecting the rights of individuals in line with GDPR. As a Data Controller we decide how your personal data is processed and for what purposes, which we explain in further detail as part of this Notice.

A list of the AXA Investment Managers companies in the UK is available upon request using the contact information provided in this Notice.

AXA Investment Managers has a UK Data Protection Officer who can be contacted via UKDPO@axa-im.com.

About this Notice

This privacy notice applies if you are our client: for example, you are invested in our range of UK authorised funds or we provide investment services to you. The privacy notice sets out the basis on which any personal data about you (or connected individuals including that of your directors, officers, employees or beneficial owners) will be processed by us or via third parties including but not limited to the administrators for our UK authorised funds (“Service Providers”). Please take the time to read and understand this privacy notice.

What personal data do we collect and process about you?

GDPR defines personal data as the following:

‘Any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;’

‘Special categories’ of personal data (sensitive personal data) relate to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

We will collect and process all or some of the following personal data about you:

Information that you provide to us

This includes information that you provide to us by filling in application forms to subscribe for shares or units in our funds or by communicating with us (or our Service Providers), whether by phone, e-mail or otherwise in relation to your investment in our funds or the investment services we provide to you. This information may include the following personal information about you or other connected individuals:

- full name, date of birth, place, district and country of birth, nationality, home or work address and telephone number, mobile telephone number, bank account details, tax details;
- National Insurance number, passport details, and proof of identification for anti-money laundering (“**AML**”) and counter terrorism financing (“**CTF**”) checks (e.g. driving license, utility bills); and

- personal data that we collect through your communication with us (or our Service Providers) via email (including but not limited to your full name, email address and the content, date and time of your email correspondence) and through call recording.

Information we generate about you

This includes details such as your investments.

Information we obtain about you from other sources

- personal data that we obtain through any AML, CTF and general “know your customer” checks that we undertake to comply with applicable laws and regulations; and
- Where you have invested in our funds or been introduced to us via a third party financial adviser, broker or consultant, personal data described above may be provided to us by such third parties.

Where you have notified us of your financial adviser, broker or consultant, the personal information that you have provided may be shared with that financial adviser, broker or consultant for the purposes outlined below. You must notify us if you no longer want us to share your personal information with, or if you have appointed a different, financial adviser, broker or consultant.

How do we use your personal data?

We comply with our obligations under GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by having appropriate technical measures in place to protect your personal data.

Your personal data may be stored and processed by us or our Service Providers in the following ways and for the following purposes:

- (a) facilitating the opening of your account with our funds and managing and administering your holdings in our funds and any related account on an ongoing basis including without limitation processing your personal data for subscription, redemption, conversion or transfer requests and distribution payments;
- (b) complying with any applicable legal, tax or regulatory obligations imposed on us or our funds including legal obligations under the Financial Services and Markets Act 2000 (as amended), the Financial Conduct Authority’s Handbook of Rules and Guidance, tax rules and guidance and AML and CTF legislation, including but not limited to:
 - (i) Fund related legislation : in order to comply with laws or regulations applicable to our funds, we may process your personal data for a variety of reasons including but not limited to sending you notices or other communications relating to our funds, convening investor meetings and related purposes;
 - (ii) AML and CTF legislation: in order to carry out AML and CTF checks and related actions, which we consider appropriate to meet any legal obligations imposed on us or our Service Providers, or the processing in the public interest or to pursue our legitimate interests, in relation to the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions, on an on-going basis, in accordance with our and our Service Providers’ AML and CTF procedures;
 - (iii) Tax regulations: we are obliged to collect certain information about your tax arrangements. Please note that in certain circumstances we may be legally obliged to share this information, and other financial information with respect to your interests in our funds, with relevant tax authorities;

- (iv) Market abuse : taking appropriate steps to identify and prevent late trading and market timing practices or any other controls relating to the prevention of market abuse.
- (c) pursuing our and/or the Service Provider's legitimate interests which include:
 - (i) carrying out statistical analysis and market research;
 - (ii) disclosures to third parties such as auditors, regulatory, tax authorities and technology providers in the context of the day-to-day operation of our funds;
 - (iii) recording, maintaining, storing and using recordings of telephone calls that you make to and receive from us, our Service Providers and their delegates or duly appointed agents and any of their respective related, associated or affiliated companies for processing and verification of instructions, management and administration of your account(s) and any other matters related to your investment in our funds, dispute resolution, record keeping, protection against fraud, security and/or training purposes; and
 - (iv) complaints handling;
 - (v) sharing information on our products, services and upcoming events;
 - (vi) tailoring and personalizing the information we distribute, by combining and analysing the data we collect, to give a more seamless, consistent and bespoke experience.

Where personal data is processed for purposes of legitimate interests, you have a right to object to such processing and we will no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. However, where you fail to provide such personal data we will not be able to accept your application for units or shares in our funds or otherwise provide you with investment services or to the extent that we do accept your application or provide investment services to you and the required personal data is not provided by you within the specified timeframe, we may be required to discontinue our relationship with you.

Your consent is not required to process your personal data for the purposes referenced above.

How do we use your personal data for communications?

Where you have separately confirmed to us that you are willing to receive marketing communications relating to our products and services, we may also process your name, address, email address and IP address for these purposes. You may withdraw your consent at any time. Instructions on how to withdraw such consent will be provided in the marketing communications you receive or you can withdraw such consent by contacting us via the contact details provided within this Notice.

For us to be able to send you information on our services and products that are relevant to you or your business, we may undertake some behavioural data analysis based on your past behaviour (for example, your attendance at events or opening of emails sent by us or on our behalf).

How do we use cookies?

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive.

Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our website.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org.

How do we share your personal data?

Your personal data may be handled by us and the Service Providers or any of our or their respective related, associated or affiliated companies for the purpose as specified above. The Service Providers will act in the capacity of a Data Processor and will handle your information in accordance with GDPR and your personal data will be treated as strictly confidential.

We may disclose your personal data to other third parties where required by law or for legitimate business interests. This may include disclosure to third parties such as, but not limited to, auditors, the Financial Conduct Authority and HM Revenue and Customs.

Do we transfer your personal data abroad?

In limited and necessary circumstances, your information may be transferred outside of the UK or the European Economic Area (“EEA”) to comply with our legal or contractual requirements. It may also be processed by individuals operating outside of the UK or the EEA who work for our affiliates or for one of our Service Providers.

Where we (or our Service Providers) transfer your personal data outside the UK or the EEA, we have in place safeguards including:

- we have binding corporate rules applicable for transfer of personal data within AXA Investment Managers and AXA Group, which address the storage and processing of personal data;
- the country that we send the data to might be approved by the European Commission as offering a sufficient level of protection;
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal data; or
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme.

In other circumstances the law may permit us to otherwise transfer your personal data outside the UK or the EEA. In all cases we will only transfer your personal data in accordance with relevant data protection law.

You can obtain a copy of our safeguards given to your personal data when it is transferred outside the UK or the EEA (including a copy of the standard data protection clauses which we have entered into with recipients of your personal data) by contacting us using the contact details provided in this Notice.

How long do we keep your personal data for?

We and our Service Providers only retain your personal data for no longer than is reasonably necessary to fulfil the purpose with which we are using your personal data and as required by UK legal and regulatory requirements.

What are your rights?

Under GDPR you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.

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If you have provided consent for the processing of your personal data, for example receipt of marketing communications, you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of GDPR with regard to your personal data. You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

You can exercise your rights by contacting us using the contact details provided within this Notice.

What happens if you fail to provide us with your personal data?

Where you fail to provide personal data that is required by us in order to accept your subscription application and manage and administer your holdings in our funds or otherwise provide you with investment services, we will not be able to accept your application or provide you with investment services or, where applicable,, we may be required to discontinue our relationship with you.

We also encourage you to inform us as soon as possible where your personal data changes.

Will changes be made to this Notice?

This Notice was last updated on **22 May 2018** and it may change from time to time and is available via our website. Please check back frequently to see any updates or changes to this Notice. Alternatively please contact us using the details provided within this Notice.

How can you contact us?

If you have any questions about our collection, use, retention, disclosure, transfer or processing of your personal information or if you wish to exercise your rights listed above, please contact us at the following address: DataPrivacy@axa-im.com.

Alternatively you can get in touch with the UK Data Protection Officer at UKDPO@axa-im.com.

We will respond to your request in writing, as soon as practicable and in any event within one month of receipt of your request, subject to the provisions of GDPR. We may request proof of identification to verify your request.