AMMEL Multi Manager Europe Limited

(“AMMEL”)

Privacy Policy - External

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Introduction

AMMEL is committed to ensuring your privacy and personal information is protected.

By providing your personal information or the personal information of someone included in your submission, you acknowledge that we may use it only in the ways set out in this Privacy Policy. We may provide you with further notices highlighting certain uses we wish to make of your personal information.

From time to time we may need to make changes to this privacy policy. This could be because of government regulation or new technologies or other developments in data protection laws. You should check the AMMEL website at select.axa-im.ie periodically to view the most up to date privacy policy.

Our Privacy Principles

When we collect and use your personal information, we ensure we look after it properly and use it in accordance with our privacy principles set out below, keep it safe and will never sell it.

1. Personal information you provide is processed fairly, lawfully and in a transparent manner
2. Personal information you provide is collected for a specific purpose and is not processed in a way which is incompatible with the purpose which AMMEL collected it
3. Your personal information is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed
4. Your personal information is kept accurate and, where necessary kept up to date
5. Your personal information is kept no longer than is necessary for the purposes for which the personal information is processed
6. We will take appropriate steps to keep your personal information secure
7. Your personal information is processed in accordance with your rights
8. We will only transfer your personal information to another country or an international organisation outside the European Economic Area where we have taken the required steps to ensure that your personal information is protected. Such steps may include placing the party we are transferring information to under contractual obligations to protect it to adequate standards
9. AMMEL and AXA IM Group companies do not sell your personal information and we also do not permit the selling of customer data by any companies who provide a service to us

How do we collect your personal information?

Whilst there are a number of ways in which we collect your personal information, the two main ways we collect personal information about you are from things you tell us yourself and from things we ask other people or organisations to share with us. Things you tell us could come from conversations we have on

the phone, what you've written on a form or if you send us an email. We might also collect information about you from other people and organisations, such as the Central Bank of Ireland or by checking databases like the electoral register. Please see below for a list of some of the ways we collect your personal information.

We collect personal information directly from you:

- via application and various event registration forms;
- through feedback forms and other forums;
- when you purchase any of our products or services;
- when you fill out a survey, or vote in a poll on our website;
- via our telephone calls with you, which may be recorded;
- when you provide your details to us either online or offline;
- when you send an email; and
- via cookies, which you can find out more about in the cookies policy on our website.

Depending on the nature of our relationship with you, we may also collect your personal information from a number of different sources including:

- through companies which validate identity for financial crime purposes using tools such as the electoral register (this is not a credit check, but a record of the search may be retained);
- from third party registers maintained by regulators such as the Central Bank of Ireland;
- through business interactions between your company and AMMEL;
- from your financial advisor; and
- from family members if you become incapacitated or unable to provide information relevant to your investment.

What personal information do we collect?

The information we collect depends on the nature of our relationship with you. For example, if you are a client invested in our funds, we collect personal information such as your name and contact details, your date of birth and information about your bank. Where other people are named in your investment such as beneficiaries, we may ask you to provide information in relation to these people too. We may also collect your consent to send you information about our products and services.

If you are a financial advisor interested in attending our events, we may collect personal information such as your name, contact details and any dietary preferences as well as your consent to send you information about our products and services.

Where we are in a business relationship with you, we may ask you to provide information relating to your colleagues.

Depending on our relationship with you, in certain limited circumstances we may request or receive sensitive personal information about you, such as details about your health if you require correspondence in braille, or your health or religion if you attend our events and have certain dietary preferences.

Where AMMEL is the data controller of your personal information we may collect the following about you:

- Personal information
    - contact details such as name, email address, postal address and telephone number
    - details of any other persons included in the investment
    - identification information such as your date of birth, national insurance number, passport, tax identification number and driving licence
    - financial information such as bank details
    - information relevant to your investment
    - information obtained through our use of cookies. You can find out more about this in our cookies policy
    - your marketing preferences

- Sensitive personal information – now called Special Category
    - if you require documents in larger font or braille this could indicate your health status
    - if you attend one of our events we may request details of your dietary preferences which could indicate your health status or religious beliefs

How and why do we use your personal information?

This is dependent on our relationship with you:

- if you are a client, we use your personal information to administer your investment product;
- if you are a financial advisor or an employee of a financial advisory firm, we use your personal information to provide you with information about our products, services and events;
- if you are an employee of a firm that we have a business relationship with, we use your personal information as part of our normal course of business;
- if you are a candidate for a job, we use your personal information as part of our recruitment process;
- if you are viewing our website, we use your personal information contained in cookies.

What is the legal basis associated with the main purpose?

As explained, we may process your personal information for a number of different purposes. We also need a reason to use and process your personal information which is called a legal basis.

- Where we are assessing your application and setting you up as an investor, administering and managing your investment, providing all related services, handling any changes to your data, making payments to you and communicating with you, then the processing is necessary for the performance of a contract to which you are party, or is necessary for our legitimate interest.

- Where we are providing you with information about our products or events that we hold, the processing is necessary for our legitimate interest.

- Where we maintain a business relationship with you or your firm, the processing is necessary for our legitimate interest.

If you do not provide information, in the circumstances detailed above, we will be unable to offer you an investment, process your payment requests or interact with you for normal business purposes.

- Where a regulator such as the Central Bank of Ireland requires us to maintain certain records of any dealings with you, the processing is necessary for us to meet our legal and regulatory obligations.

- Where we need to use your personal information to establish, exercise or defend our legal rights. For example, when we are faced with any legal claims or where we want to pursue any legal claims ourselves, the processing is necessary for us to meet our legal obligations.

- Where we need to use your personal information to carry out anti-money laundering checks or investigate fraud, the processing is necessary for reasons of public interest.

We will usually only ask for your consent in relation to processing your Special Category information (such as health data), or when providing marketing information to you (including information about other products and services). This will be made clear when you provide your personal information. If we ask for your consent we will explain why it is necessary.

Why we need your personal information	Personal information we may process shall include, but shall not be limited, to the types of information set out below	Legal basis for processing – because it is necessary to:
To review your investment application (including tax domicile status).	Your name, contact details, date of birth, PPS number, address for tax purposes. Similar information for other individuals included in the investment, such as beneficiaries.	• provide you with your investment (contract) • meet obligations imposed on us by tax authorities and regulator (legal obligation)
To administer, provide and service your investment.	Your name, contact details, date of birth, PPS number, address for tax purposes. Similar information for other individuals included in the investment, such as beneficiaries. Investment performance information. Your bank account details.	• provide you with your investment (contract) • meet obligations imposed on us by tax authorities and regulator (legal obligation) • to receive payments from you and to make payments to you (our legitimate interest)
To regularly communicate with you.	Your name, contact details and any information relevant to your investment. Similar information for other individuals included in the investment, such as beneficiaries. Investment performance information. Health information if you request communications in Braille or other easier to read formats.	• provide you with your investment (contract) • meet obligations imposed on us by tax authorities and regulator (legal obligation) • receive payments from you and to make payments to you (our legitimate interest) • any Special Category data relating to health will only be processed to provide you with relevant material (your consent)
To resolve any complaints you may have.	Your name, contact details and any information relevant to your investment.	• resolve any complaints (legal obligation and our legitimate interest)

	Similar information for other individuals included in the investment, such as beneficiaries.	
To prevent financial crime such as money laundering, sanctions breaches, tax evasion and fraud.	Your name, contact details, date of birth, PPS number, address for tax purposes. Similar information for other individuals included in the investment, such as beneficiaries. Your bank account details.	• provide you with your investment (contract) • meet obligations imposed on us by tax authorities and regulator (legal obligation) • any special category data or data relating to criminal convictions will only be processed to prevent financial crime (substantial public interest)
For our own internal and external management information purposes, maintaining accounting records, analysis of financial results, internal audit requirements, receiving professional advice.	Your name, contact details, date of birth, PPS number, address for tax purposes. Similar information for other individuals included in the investment, such as beneficiaries. Investment performance information.	• maintain appropriate records to monitor performance and evaluate business performance (our legitimate interest) • meet obligations imposed on us by tax authorities and regulator (legal obligation)
For analytical purposes and to improve our products and services**.**	Your name, contact details, date of birth, PPS number, address for tax purposes. Similar information for other individuals included in the investment, such as beneficiaries. Investment performance information.	• internal analysis and service improvement (our legitimate interest)
To comply with our legal or regulatory obligations.	Your name, contact details and any information relevant to your investment. Similar information for other individuals included in the investment, such as	• meet obligations imposed on us by tax authorities and regulator (legal obligation)

	beneficiaries. Investment performance information.	
To develop improved quality, training and security and to create evidence of your servicing or information requests through recorded or monitored phone calls.	Your name, contact details and any information relevant to your investment. Similar information for other individuals included in the investment, such as beneficiaries. Your name, contact details and any information relating to your company and our business relationship. Similar information for other individuals employed by your firm or associated with the business relationship.	• maintain appropriate records to monitor performance and evaluate business performance (our legitimate interest) • meet obligations imposed on us by tax authorities and regulator (legal obligation) • maintain appropriate records to meet business requirements (contract and our legitimate interest)
To provide you with relevant marketing information.	Your name, contact details and marketing preference.	• supply promotional material relating to our events, products and services (your consent)
To provide you with relevant materials, information and refreshments at our events.	Your name, contact details and any information relating to your company and our business relationship. Similar information for other individuals employed by your firm or associated with the business relationship. Your dietary preferences, including any allergies or food associated with religious beliefs.	• internal analysis and service improvement (our legitimate interest) • supply promotional material relating to our event, products and services (your consent) • provide food which may indicate health or religious belief (your consent)

Who do we share your personal information with?

Disclosures within our group

In order to provide our products and services your personal information is shared with other companies in the AXA IM Group. Your personal information might be shared for our general business administration or efficiency and accuracy purposes.

We may also share data with relevant BNP Paribas SA* group of companies for internal administrative purposes compatible with the processing purposes defined in the Privacy Policy.[1]

Disclosures to third parties

We also disclose your information to the third parties listed below for the purposes described in this Privacy Policy. This might include:

- Your relatives, powers of attorney, guardians acting on your behalf or other people or organisations associated with you such as your financial advisor or your lawyer
- Our third-party investment product and service administrators
- Identity and Verification agencies
- Other services providers such as IT system suppliers, auditors, lawyers, marketing agencies, document management providers and tax advisers
- Law enforcement agencies, police or other relevant Government departments where reasonably necessary for financial crime and sanction prevention purposes
- Other parties in commercial relationships with AMMEL, including financial organisations and advisors

Disclosure of your personal information to a third party outside of the AXA IM Group will only be made where the third party has agreed to keep your information strictly confidential and shall only be used for the specific purpose for which we provide it to them.

We may also disclose your personal information to other third parties where:

- We are required or permitted to do so by law or by regulatory bodies such as where there is a court order, statutory obligation or Central Bank of Ireland or Data Protection Commission request
- We believe that such disclosure is necessary in order to assist in the prevention or detection of any criminal action (including fraud) or is otherwise in the overriding public interest.

[1] ** BNP Paribas SA -16, boulevard des Italiens - 75009 Paris, France (662 042 449 RCS Paris)*

Some of the recipients set out above may be in countries outside of the EEA notably in (i) Switzerland, where AXA IM has a European Data Centre, and (ii) India, where some administration is undertaken.

Where we make a transfer of your personal information outside of the EEA we will take the required steps to ensure that your personal information is protected. Such steps may include placing the party we are transferring personal information to under contractual obligations to protect it to adequate standards.

How long do we keep records for?

We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and in order to comply with our legal and regulatory obligations.

The time period we retain your personal information for will differ depending on the nature of the personal information and what we do with it. How long we keep personal information is primarily determined by our regulatory obligations.

We typically keep personal data used for your investment product for 7 years from the end of our relationship with you. In some cases where there may be a dispute or a legal action we may be required to keep personal information for longer.

Your Rights

You can ask us to do various things with your personal information. For example, at any time you can ask us for a copy of your personal information, ask us to correct mistakes, change the way we use your information, or even delete it. We'll either do what you've asked, or explain why we can't - usually because of a legal or regulatory issue. You have the following rights in relation to our use of your personal information.

The right to access your personal information

You are entitled to a copy of the personal information we hold about you and certain details of how we use it. There will not usually be a charge for dealing with these requests**.** Your personal information will usually be provided to you in writing, unless otherwise requested. Where you have made the request by electronic means the information will be provided to you by electronic means where possible.

The right to rectification

We take reasonable steps to ensure that the personal information we hold about you is accurate and complete. However, if you do not believe this is the case, please contact by using the details shown in your documentation and you can ask us to update or amend it.

The right to erasure:

In certain circumstances, you have the right to ask us to erase your personal information. For example, where the personal information we collected is no longer necessary for the original purpose or where you withdraw your consent. However, this will need to be balanced against other factors. For example,

according to the type of personal information we hold about you and why we have collected it, there may be some legal and regulatory obligations which mean we cannot comply with your request.

Right to restriction of processing:
In certain circumstances, you are entitled to ask us to stop using your personal information. For example, where you think that the personal information we hold about you may be inaccurate or where you think that we no longer need to process your personal information.

Right to data portability:
In certain circumstances, you have the right to ask that we transfer any personal information that you have provided to us to another third party of your choice. Once transferred, the other party will be responsible for looking after your personal information.

Right to object to direct marketing:
You can ask us to stop sending you marketing messages at any time.

Right not to be subject to automated-decision making:
We make certain decisions using automated systems, such as checking identity for financial crime purposes. You have the right to request that one of our employees makes that decision.

The right to withdraw consent:
For certain limited uses of your personal information, we will ask for your consent. Where we do this, you have the right to withdraw your consent to further use of your personal information.

The right to lodge a complaint
You have a right to complain to the DPC at any time if you object to the way in which we use your personal information. More information can be found on the Data Protection Commission's website: https://www.dataprotection.ie.

You can make any of the requests set out above using the contact details in this policy. Please note that in some cases we may not be able to comply with your request for reasons such as our own obligations to comply with other legal or regulatory requirements. However, we will always respond to any request you make and if we can't comply with your request, we will tell you why.

In some circumstances exercising some of these rights will mean we are unable to continue providing you with your investment or maintaining a business relationship with you.

Marketing

You are in control of how we use your information for marketing and we will only contact you if you have agreed that we can. In these circumstances we might use your information to tell you about products and services that could interest you.

We may share information within the AXA IM Group to inform you of other products and services that may be of interest to you, but we will only do this where you have provided your consent.

We are committed to only sending you marketing communications that you have clearly expressed an interest in receiving. If you wish to unsubscribe from any emails sent by us, you may do so at any time by following the unsubscribe instructions that appear in the email. Otherwise you can always contact us using the details set out in this policy to update your contact preferences. In such circumstances, we will continue to send you service related (non-marketing) communications where necessary.

From time to time we may run specific marketing campaigns through social media and digital advertising that you may see which are based on general demographics and interests. Individual personal information is not used for these campaigns. If you do not want to see any campaigns then you will need to adjust your preferences within social media settings and your cookie browser settings.

Contact Details of the Data Protection Officer

If you wish to contact the AMMEL Data Protection Officer the details are below:

AMMEL
The Data Protection Officer AMMEL Multi-Manager Europe Limited Wolfe Tone House Wolfe Tone Street Dublin 1 Email address: aoife.mcgee@axa-im.com

If you would like to contact the Irish Data Protection Commission direct; please write to:

Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28

AMMEL' data privacy declaration

Your personal information can help us give you a better, more personalised service. But looking after

that data is a big responsibility. We take our responsibilities seriously, so we've introduced internationally recognised data privacy rules to protect you. We keep your data safe, confidential and will never sell it. If you ask us to we will tell you exactly what information we have so you can be sure it's up-to-date and accurate.

Our commitment to safeguard personal information

We know that respecting the confidentiality of personal information is critical to preserving your trust. As a result, we have developed security procedures and implemented a range of organisational and technical security measures designed to protect your personal information from unauthorized use or disclosure. We have a Data Privacy team at a global level and a network of Data Privacy Officers throughout our businesses to oversee data safety.

Due to the global organisation of AXA IM and the use of international service providers (technology or financial), some of your personal data may be transferred (i.e. accessed or stored) outside of your country and the European Union, to countries that do not have personal data protection legislation equivalent to that of the country of origin of the data (Third Countries).

AXA IM has put in place EU standard contractual clauses and binding corporate rules (AXA's Corporate Website | AXA) that govern all transfers of personal data to Third Countries.

Our commitment in respect of the use of personal information

We collect your personal information and use it in compliance with data protection laws. We have in place procedures and contractual arrangements designed to ensure that all employees keep personal data confidential.

We view ourselves as custodians of any personal data supplied to us and do not sell it to third parties.

Our commitment to dialogue and transparency

These are our continuing commitments to you. We will keep pace with future developments surrounding data privacy to adapt them to your evolving needs.

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Policy Approval Record	**Entity**	**Date**	**Comments**	**Approved**
AMMEL Management Committee	AMMEL	28 February 2023	Version 0.5 approved.	Yes
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