

Client Data Sharing Summary

Clearstream Fund Centre S.A. (CFCL) is an entity supervised by the Commission de Surveillance du Secteur Financier (CSSF), including supervision on outsourcings and the sharing of Client Data to be in line with applicable laws and regulations. The Client authorises, instructs and consents to CFCL to share Client Data in the context of outsourcing and for such other purposes as provided in the General Terms and Conditions.

CFCL has stringent control mechanisms in place ensuring confidentiality of Client Data. Client Data is only shared on a “need to know” and “least principle” basis. Affiliates and other third parties who have access to Client Data are either subject by law to professional secrecy or be bound by appropriate confidentiality terms; this includes as well any third-party providers of IT platforms or cloud infrastructures regardless of whether they may exceptionally have access to Client Data in the scope of support or maintenance activities.

For the purpose of client onboarding and for the fulfilment of anti-money laundering, countering the financing of terrorism (CTF) and know-your customer (KYC) duties, in compliance with applicable laws and regulations, CFCL and other Affiliates of Deutsche Börse AG use common platform tools to collect and process Client Data. To the extent the Client is also a client or intends to become a client of any Affiliate, such data may be shared with the relevant Affiliate(s) through these platform tools. The data shared remains limited to the data as required for these purposes by applicable laws, regulations and internal policies.

CFCL shares Client Data mainly within the internal operating framework of Deutsche Börse Group, and here primarily with

- Clearstream Fund Centre S.A., Cork Branch (Ireland);
- Clearstream Services S.A. (Luxembourg);
- Clearstream Fund Centre Representative Office Zurich (Switzerland);
- Clearstream Fund Centre (Hong Kong) Limited;
- Clearstream Australia Limited (Australia);
- Clearstream Services SA, Prague Branch (Czech Republic);
- Deutsche Börse Services s.r.o. (Czech Republic);
- Clearstream Europe AG (Germany);
- Deutsche Börse A.G. (Germany);
- Clearstream London Ltd, London (UK)
- Clearstream Banking S.A. (Luxembourg);
- Clearstream Banking S.A., Singapore Branch (Singapore);
- FundsDLT S.A. (Luxembourg)
- Kneip Communications S.A. Luxembourg

1. Type of Client Data potentially transmitted

Client Data shared by CFCL may include, for example, the following:

- Account Details and Account Balances;
- Transaction Data;
- Financial Data;
- Investment Data;
- End-Client Data;
- Compliance Data;
- Contact Data; and
- Legal and Business Terms including Fees.

2. Country of Establishment of Data Recipient

2.1 Client services

Services		Country
Investment Funds Services	Vestima (including Vestima Prime)	Australia, Czech Republic, Germany, Ireland, Luxembourg, Singapore, Switzerland, UK
	Distribution Services	Australia, Czech Republic, Germany, Ireland, Luxembourg, Singapore, Switzerland, UK
Connectivity		Czech Republic, Luxembourg
Client Relationship Management (including Onboarding and Maintenance, Client Service, Transition Service)		Australia, Czech Republic, Dubai, Germany, Hong Kong, Ireland, Japan, Singapore, Switzerland, UK, USA
Sales (including potential services by Affiliates)		Australia, Czech Republic, Dubai, Germany, Hong Kong, Ireland, Japan, Singapore, Switzerland, UK, USA

2.2 Internal functions

Function	Country
IT	Austria, Belgium, Czech Republic, Finland, France, Germany, India, Ireland, Luxembourg, Netherlands, USA
Regulatory Reporting	UK

Legal	Germany, Luxembourg, Singapore, Switzerland, USA
Compliance	Czech Republic, Germany, Ireland, Luxembourg, Singapore, UK, USA
Treasury	Czech Republic, Germany, Luxembourg, Singapore
Data Protection	Germany, Luxembourg
Marketing	Germany, Luxembourg

The information contained in this Client Data Sharing Summary may be subject to amendment by publication of an updated version of this Client Data Sharing Summary on the CFCL website. Such update shall be made available timely in advance of the operational change being implemented.

Terms not defined in this Client Data Sharing Summary shall have the meaning as assigned in the General Terms and Conditions.