

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. Subject to the terms of the General Terms and Conditions and the conditions of applicable laws and regulations, CFCL may share Client Data and outsource tasks.

CFCL has stringent control mechanisms in place ensuring 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.

CFCL and other Affiliates of Deutsche Börse AG use a common platform tool for the performance of anti-money laundering (AML), countering the financing of terrorism (CTF) and know-your-Client (KYC) duties to ensure regulatory compliance. To the extent the Client is or becomes prospect or Client of other Affiliate(s), this platform also provides for specific sharing of Client Data between the relevant entities; such data being limited to the Client’s AML, CTF and KYC data, as required by applicable laws, regulations, and internal policies.

While other third-party services providers may be used, CFCL mainly delegates tasks and shares Client Data 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 AG (Switzerland);
- Clearstream Fund Centre (Hong Kong) Limited;
- Clearstream Australia Limited (Australia);
- Clearstream Services Prague Branch (Czech Republic);
- Deutsche Börse Prague Branch (Czech Republic);
- Clearstream Europe AG (Germany);
- Deutsche Börse AG (Germany);
- Clearstream London Limited (UK);
- Clearstream Banking S.A. (Luxembourg);
- Clearstream Banking S.A., Singapore Branch (Singapore);
- FundsDLT S.A. (Luxembourg);
- Kneip Communication 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. Relevant services and Country of Establishment of Data Recipient / Services Provider

2.1 Client services

Services		Country of Establishment of Data Recipient / Services Provider
Investment Funds Services	Vestima (including VestimaPRIME)	Australia, Czech Republic, Germany, Ireland, Luxembourg, Singapore, Switzerland, UK
	Distribution Services	Australia, Czech Republic, Germany, Ireland, Luxembourg, Singapore, Switzerland, UK
Connectivity		Czech Republic, Luxembourg, Ireland
Client Relationship Management (including Onboarding and Maintenance, Client Service, Transition Service)		Australia, Czech Republic, United Arab Emirates (Dubai), Germany, Hong Kong, Ireland, Japan, Singapore, Switzerland, UK, U.S.A., Luxembourg
Sales (including potential services by Affiliates)		Australia, Czech Republic, United Arab Emirates (Dubai), Germany, Hong Kong, Ireland, Japan, Singapore, Switzerland, UK, U.S.A., Luxembourg

2.2 Internal functions

Function	Country of Establishment of Data Recipient / Services Provider
IT	Austria, Belgium, Czech Republic, Finland, France, Germany, Ireland, Luxembourg, Netherlands, U.S.A., India
Regulatory Reporting	Luxembourg
Legal	Germany, Luxembourg, Singapore, Switzerland, U.S.A.
Compliance	Czech Republic, Germany, Ireland, Luxembourg, Singapore, UK, U.S.A.
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 an 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.