

## Customer 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 Customer 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 Customer Data and outsource tasks. CFCL has stringent control mechanisms in place ensuring Customer Data is only shared on a “need to know” and “least principle” basis. Affiliates and other third parties who have access to Customer 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 or not they may exceptionally have access to Customer 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-customer (KYC) duties to ensure regulatory compliance. To the extent the Customer is or becomes prospect or customer of other Affiliate(s), this platform also provides for specific sharing of Customer Data between the relevant entities; such data being limited to the Customer’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 Customer Data within the internal operating framework of Deutsche Börse Group, and here primarily with:
  - Clearstream Global Securities Services Ltd (Ireland)
  - Clearstream Services S.A. (Luxembourg);
  - Clearstream Fund Centre AG (Switzerland);
  - Clearstream Australia Limited (Australia);
  - Clearstream Operations Prague s.r.o. (Czech Republic);
  - Deutsche Börse Services s.r.o. (Czech Republic);
  - Clearstream Banking AG (Germany);
  - Deutsche Börse A.G. (Germany);
  - Clearstream Banking S.A. (Luxembourg);
  - Clearstream Banking S.A., Singapore Branch (Singapore);
  - Clearstream Banking S.A., London Branch (UK).

## 1. Type of Customer Data potentially transmitted

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

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

Customer Data shared may also include Personal Data as such term is defined in the Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons regarding the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC. The processing of Personal Data by CFCL is detailed in the full disclosure information as separately available on the CFCL website page, which reads with Art. 21 of the General Terms and Conditions as Governing Document.

## 2. Relevant services and Country of Establishment of Data Recipient / Services Provider

### 2.1 Customer services

Services		Country of Establishment of Data Recipient / Services Provider
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 of Establishment of Data Recipient / Services Provider
IT	Austria, Belgium, Czech Republic, Finland, France, Germany, Ireland, Luxembourg, Netherlands, USA
Regulatory Reporting	Luxembourg
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 Customer Data Sharing Summary may be subject to amendment by publication of an updated version of this Customer 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 Customer Data Sharing Summary shall have the meaning as assigned in the General Terms and Conditions.