

## Privacy Notice

Mackenzie Investments Europe Limited (“MIEL”) may collect information on prospective investors and other interested parties and their representatives, which may constitute personal data within the meaning of the EU’s General Data Protection Regulation and the Data Protection Acts 1988-2018.

MIEL is obliged to obtain personal data, and in some cases documentation validating that personal data, in order to comply with the legal, regulatory and contractual obligations listed below:

- to manage and administer client trading accounts;
- to facilitate ongoing communications with clients, investors and other interested parties in relation to MIEL’s trading strategies and investment vehicles;
- to maintain records of attendance at training events and seminars;
- to comply with legal, tax and regulatory obligations applicable to investors and MIEL;
- to mitigate against fraud and other criminal activity.

MIEL will not conclude a trading account agreement with any prospective client where such information is not provided by the client.

We share Personal Data with our parent company Mackenzie Financial Corporation and associated companies in Canada, a country which the European Commission has recognised as having an adequate level of personal data protection. Data will be shared for legitimate business interests and to comply with regulatory obligations, for example to comply with EU and Canadian Anti-Money Laundering obligations.

MIEL may share personal data with third parties and contractors who supply certain data processing services to MIEL. Such data processors are required to maintain the confidentiality of the data and process it only in accordance with the documented instructions of MIEL, except where otherwise required by Law. Other recipients of personal data may include regulatory and tax authorities in Ireland and other third countries where either a regulatory or taxation obligation for MIEL, its parent and associated companies, or its clients exists. MIEL’s Auditor may also be a recipient of personal data to the extent that it requires such data for the purposes of auditing the company’s financial statements and gathering sufficient evidence to support the opinion expressed thereon.

Personal Data will be held in accordance with the Information Security Policy of MIEL, which sets out the physical, electronic and procedural safeguards to protect and restrict access to personal data. Client data will be held for a period of 7 years after the termination of the client relationship. Where personal data is held solely on the basis of the Data Subject’s consent (typically for the purposes of marketing communications), such data will be deleted upon the withdrawal of consent by the Data Subject.

Data Subjects have a right of access to their personal data kept by the Company and the right to amend, rectify any inaccuracies, or request the deletion of their personal data by making a request to the Head of Compliance, Mackenzie Investments Europe Limited, 3 Shelbourne Buildings, Crampton Avenue, Shelbourne Road, Ballsbridge, Dublin 4 D04 C2YK, Ireland or emailing [mielcompliance@mackenzieinvestments.com](mailto:mielcompliance@mackenzieinvestments.com). Data subjects may request their data in a portable electronic form, but MIEL is not obliged to comply with requests for specific file formats.

Data Subjects have a right to lodge a complaint with the Data Protection Commission. See [www.dataprotection.ie](http://www.dataprotection.ie) for details.