

Ownership Capital UCITS ICAV

Data Protection Notice

This notice sets out how the Fund will process personal data (as a Data Controller).

Where your details are provided to the Fund as a consequence of your investment in the Fund, then the Fund, acting as a data controller may (itself or through a third party such as Carne Global Fund Managers (Ireland) Limited (the “**Manager**”) acting in its capacity as the Fund’s management company, Northern Trust International Fund Administration Services (Ireland) Limited (the “**Administrator**”) acting in its capacity as the Fund’s administrator Ownership Capital B.V. (the “**Investment Manager**”), acting in its capacity as the Fund’s investment manager and distributor or such other entities or third parties as may be appointed by the Fund, including by any of the entities listed in the directory of the Prospectus (together the “**Fund Service Providers**”) collect, use and otherwise process your personal data or that of your directors, officers, employees and/or beneficial owners.

‘Personal data’ means any information relating to an identified or identifiable individual.

When processing your personal data, there may also be times where a Fund Service Provider will act as a data controller, such as Northern Trust Fiduciary Services (Ireland) Limited, in its capacity as the Fund’s Depositary (the “**Depositary**”). However, this Data Protection Notice relates only to the processing by, or on behalf of, the Fund where the Fund acts as a data controller. A ‘data controller’ is responsible for deciding how to hold and use personal data about you. In connection with this, please note the following:

Categories of Personal Data

Personal data processed by the Fund or on the Fund’s behalf may include, but is not necessarily limited to, your name, residential address, place of business, email address, other contact details, corporate contact information, signature, employment and job history, regulatory status, correspondence records, details relating to your investment activity or preferences..

Purposes of Processing and Legal basis for processing

Your personal data may be processed by the Fund, or on behalf of the Fund (including by the Fund Service Providers (or any of their affiliates, group entities, agents, employees, delegates or sub-contractors) when they process your personal data on behalf of the Fund) for the following purposes:

- to facilitate the opening of your account with the Fund, the management and administration of your holdings in the Fund and any related account on an on-going basis (the “**Services**”) which are necessary for the performance of your contract with the Fund, including without limitation the processing of redemption, conversion, transfer and additional subscription requests, the payment of distributions and mailing related materials to you;
- in order to carry out anti-money laundering checks and related actions which the Fund considers appropriate to meet any legal obligations imposed on the Fund relating to or to pursue the Fund’s legitimate interests in relation to, the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions, on an on-going basis, in accordance with the Fund’s anti-money laundering procedures;
- to report tax related information to tax authorities in order to comply with a legal obligation;
- to monitor and record calls and electronic communications for (i) processing and verification of instructions, (ii) investigation and fraud prevention purposes, (iii) for crime detection, prevention, investigation and prosecution, (iv) to enforce or defend the Fund and its affiliates, itself or through third parties to whom it delegates such responsibilities or rights in order to comply with any legal obligation imposed on the Fund, in each case as is necessary to pursue the Fund’s legitimate interests in relation to such matters;
- in connection with legal or regulatory proceedings, such as responding to a subpoena or request from the Central Bank of Ireland, where necessary for the purposes of complying with a legal or regulatory obligation to which

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the Fund is subject;

- to disclose information to other third parties such as service providers of the Fund, auditors, regulatory authorities and technology providers in order to comply with any legal obligation imposed on the Fund or in order to pursue the legitimate interests of the Fund;
- to monitor and record calls for quality control, business and statistical analysis, training and related customer service purposes in order to pursue the legitimate interests of the Fund to improve its service delivery;
- for marketing purposes including to provide tailored experiences and advertisements about the products and services offered by the Fund where such processing is necessary for the purposes of pursuing the legitimate interests of the Fund;
- to update and maintain the Fund's records and fee calculation where necessary for the performance of your contract with the Fund for the purposes of complying with a legal obligation to which the Fund is subject and as necessary for the legitimate interest of maintaining accurate records;

Recipients of Data and International Transfer of Data

The Fund, or the Fund Service Providers on the Fund's behalf, may disclose your personal data to:

- the Fund Service Providers, and their affiliates and their service providers;
- to competent authorities (including tax authorities), courts and bodies as required by law or requested or to affiliates for internal investigations and reporting;
- introducers, distributors or other intermediaries who market or provide services to you;
- professional advisers including lawyers, bankers, auditors and insurers to the extent such information is relevant to their performance of their services;
- depositaries;
- trading counterparties;
- IT service providers, such as cloud service providers;
- Parties undertaking anti-money laundering checks; and
- any of the Fund's other service providers where such information is relevant to their performance of such services.

The disclosure of personal data to the third parties set out above may involve the transfer of data to the USA and other jurisdictions outside the European Economic Area (EEA) in accordance with the requirements of the General Data Protection Regulation. Your personal data may also be transferred to the UK. Following the UK's departure from the EU, the UK's data protection laws may diverge from those in the EEA. Such countries may not have the same data protection laws as your jurisdiction. The European Commission has only deemed the USA to provide an adequate level of protection where the personal data is processed within the Privacy Shield framework. The Fund has authorised the Administrator as its agent to put in place Standard Contractual Clauses with relevant parties to whom personal data will be transferred. Such standard clauses will be put in place where necessary for purposes of compliance with the data protection legislation (e.g. where the European Commission has not determined that the destination country provides an adequate level of protection in respect of personal data). Please contact the Administrator for copies of the Standard Contractual Clauses that have been entered into on behalf of the Fund.

Retention period

The Fund and the Fund Service Providers will retain your personal data for as long as required to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements and the Fund's legitimate interests in maintaining such personal data in its records or to perform investigations in relation

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to some depending on whether additional legal/regulatory obligations mandate that the Fund retains your personal data. In doing this the Fund will have regard to the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which the Fund processes your personal data and whether those purposes can be achieved through other means, and the applicable legal requirements.

Data Subject Rights

You have the following rights, in certain circumstances and subject to certain conditions, in relation to your personal data:

- Right to access your personal data.
- Right to rectify your personal data.
- Right to restrict the use of your personal data (in certain specific circumstances).
- Right to request that your personal data is erased (in certain specific circumstances).
- Right to object to processing of your personal data (in certain specific circumstances).
- Right to data portability (in certain specific circumstances).

Where the Fund or a Fund Service Provider requires your personal data to comply with AML or other legal requirements or proceedings, failure to provide this information means the Fund may not be able to accept you as an investor in the Fund or in any of its sub-funds, or it may need to terminate the business relationship.

You have the right to lodge a complaint with a supervisory authority in the EU Member State of your habitual residence or place of work or in the place of the alleged infringement if you consider that the processing of personal data relating to you carried out by the Fund or its service providers infringes the General Data Protection Regulation.

Change of Purpose

If it becomes necessary to use your Personal Data for a purpose other than the original purpose(s) for which it was provided as contemplated above (Purposes of Processing and Legal basis for processing) you will be notified with details of the legal basis for doing so.

How Your Personal Data is Collected

Personal Data may be collected from you on behalf of the Fund from the details required on the subscription application form of the Fund but also whenever you interact with the Fund, the Fund Service Providers or any other third parties in connection with your investment, including when you visit the Fund website, request literature or call a service provider.

In addition, the Fund may receive personal information about you from third parties, such as:

- public sources or information vendors;
- your bank;
- your legal, financial, tax or other professional advisers;
- transfer agents;
- introducers, distributors or other intermediaries who market or provide services to you.

Changes to this Privacy Notice

This privacy notice may be updated at any time. In such circumstances an updated version will be posted to the Fund's website (<https://ucits.ownershipcapital.com>) and where substantial updates are being undertaken details will also be provided to you directly.

How to contact us

If you have any questions about our use of your personal information, please contact us at operations@ownershipcapital.com.