PRIVACY POLICY

1 Introduction

1.1 This is the Privacy Policy of Seilern International Funds plc, which is referred to as the "**Fund**", "**us**" or "**we**" throughout this Privacy Policy. This Privacy Policy provides details of the way in which we Process Personal Data in line with our obligations under Data Protection Law.

1.2 Capitalised terms used in this Privacy Policy are defined in the Glossary in Annex I.

2 Background and Purpose

2.1 The purpose of this Privacy Policy is to explain what Personal Data we Process and how and why we Process it. In addition, this Privacy Policy outlines our duties and responsibilities regarding the protection of such Personal Data. The manner in which we Process Personal Data will evolve over time, and we will update this Policy from time to time to reflect changing practices.

2.2 In addition, in order to meet our transparency obligations under Data Protection Law, we will incorporate this Privacy Policy by reference into various points of data capture used by us including subscription application forms.

3 The Fund as a Data Controller

3.1 The Fund will act as a Data Controller in respect of Personal Data provided to us by various individuals in connection with the management, operation and administration of the Fund. Such individuals will include the following (see Annex III below for further detail on the categories of individuals for whose personal data the Fund acts as Data Controller):

(a) Shareholders (including individuals having a connection to a shareholding or potential shareholding, or acting on a shareholder's behalf (such as applicants, beneficial owners, controlling persons, authorised signatories, representatives, contact persons, nominees and intermediaries));

(b) Directors, designated persons and other individuals performing "controlled functions" within the Fund under the Central Bank of Ireland's Fitness & Probity regime; and

(c) Employees of service providers who provide services to the Fund.

3.2 Personal Data is processed by the Fund for the following purposes (see Annex II for further detail on the categories of Personal Data processed):

Personal Data	Purpose of Processing	Lawful Basis under GDPR
Identity Data; Financial Data; AML Data	To manage and administer a Shareholder's holding in the Fund and any related accounts on an ongoing basis.	As required for the performance of the contract between the Shareholder and the Fund (per Art. 6(1)(b) GDPR).
Identity Data; Financial Data; Traffic and Usage Data	To assess whether an applicant or Shareholder is eligible to invest in the Fund, including by reference to applicable distribution restrictions or sanctions and to carry out statistical analysis and market research relating to the Fund and its investor base.	As necessary and proportionate in the Fund's legitimate business interests (per Art. 6(1)(f) GDPR).
Identity Data; Financial Data; AML Data	To comply with legal and regulatory obligations applicable to the Shareholder and/or the Fund from time to time, including, without limitation, applicable tax, anti-money laundering and counter-terrorist financing legislation. In particular, in order to comply with the information reporting regimes, set out in Section 891C and Section 891E to Section 891G (inclusive) of the Taxes Consolidation Act 1997 (as amended) and regulations made pursuant to those sections), Shareholders' personal data (including financial information) may be shared with the Irish Revenue Commissioners. They in turn may exchange information (including personal data and financial information) with foreign tax authorities (including foreign tax authorities located outside the European Economic Area). Please consult the AEOI (Automatic Exchange of Information) webpage on www.revenue.ie for further information in this regard.	To comply with legal obligations to which the Fund is subject (per Art. 6(1)(c) GDPR).

Personal Data	Purpose of Processing	Lawful Basis under GDPR
Identity Data; Financial Data; Traffic and Usage Data	For any other specific purposes where the Shareholder has given specific and informed consent based on an appropriate notice.	Based on Shareholder consent (per Art. 6(1)(a) GDPR).
Identity Data	Where applicable, to record telephone calls and other communications relating to the Fund for record-keeping, security, fraud prevention, quality assurance, training and compliance purposes.	As necessary and proportionate in the Fund's legitimate business interests to ensure record-keeping, security, fraud prevention and service optimisation (per Art. 6(1)(f) GDPR).

3.3 If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as allowing you to invest), or we may be prevented from complying with our legal obligations (including our AML obligations).

4 The Fund and Data Processors

4.1 The Fund will engage certain service providers to perform certain services on its behalf which may involve the Processing of Personal Data. To the extent that such Processing is undertaken based on the instructions of the Fund and gives rise to a Data Controller and Data Processor relationship, the Fund will ensure that such relationship is governed by a contract which includes the data protection provisions prescribed by Data Protection Law.

5 Special Categories of Personal Data

5.1 The Fund will not ordinarily obtain or process Special Categories of Personal Data ("SCPD"). However, in the event it may do so, it shall Process such Personal Data in accordance with Data Protection Law. In such circumstances your explicit consent may be sought in order for us to process your SCPD. If there are occasions where the Fund seeks your consent to process SCPDs, you can subsequently withdraw your consent at any time without affecting the lawfulness of any processing based on explicit consent before its withdrawal.

6 Individual Data Subject Rights

Data Protection Law provides certain rights in favour of data subjects, including the right to object to certain uses of Personal Data. The rights in question are as follows (the "**Data Subject Rights**"):

(a) the right of a data subject to receive detailed information on the processing (by virtue of the transparency obligations on the Controller);

(b) the right of access to Personal Data;

(c) the right to amend and rectify any inaccuracies in Personal Data;

(d) the right to erase Personal Data (right to be forgotten);

(e) the right of data portability;

(f) the right to restrict Processing;

(g) the right to object to Processing; and

(h) the right to object to automated decision making, including profiling;

6.2 Please note that if you provide your consent for the Fund to use your Personal Data for a particular purpose, you have the right to withdraw your consent at any time without affecting the lawfulness of any processing based on consent before its withdrawal. You can do so by contacting the Fund at the email address specified below (see section titled "Contact Us" below).

6.3 These Data Subject Rights will be exercisable by data subjects subject to limitations as provided for Data Protection Law. In certain circumstances it may not be feasible for the Fund to discharge these rights, for example because of the structure of the Fund or the manner in which the Shareholder holds Shares in a Fund. Data subjects may make a request to the Fund to exercise any of the Data Subject Rights using the contact information provided below (*Contact Us/Complaints Procedure*). Requests shall be dealt with in accordance with Data Protection Law.

7 Disclosing Personal Data

7.1 From time to time, we may disclose Personal Data to third parties or allow third parties to access Personal Data which we Process (for example, where a law enforcement agency or regulatory authority submits a valid request for access to Personal Data) and for the purposes of fraud prevention or investigation. In relation to Shareholders, the Fund may be required to disclose Personal Data relating to U.S. Reportable Persons to the U.S. Internal Revenue Service for purposes of FATCA compliance.

7.2 We may also disclose Personal Data to the following categories of recipients:

(a) Fund delegates and service providers, including the management company, investment manager, company secretary, distributors, administrator and transfer agent, depositary, sub-custodians and technology providers, where relevant to the services they provide to the Fund (Identity Data, Financial Data, AML Data and Traffic and Usage Data);

(b) professional advisers, including auditors, legal counsel, tax advisers and other consultants engaged by or in connection with the Fund (Identity Data, Financial Data and AML Data, and Traffic and Usage Data where relevant);

(c) regulatory, tax, governmental and law-enforcement authorities, where disclosure is required or permitted by applicable law or regulation (Identity Data, Financial Data and AML Data); and

(d) related, associated or affiliated entities of the foregoing recipients, where disclosure is necessary for the same or related purposes and is permitted under applicable Data Protection Law (the categories of Personal Data relevant to the applicable purpose).

8 Data Retention

8.1 We will keep Personal Data for:

(a) the duration of the investment by an investor in the Fund and afterwards in accordance with the Fund's legal and regulatory obligations (complying also with the minimum retention periods for AML Data and Identity Data / Financial Data / other Personal Data used for tax reporting purposes as required under applicable law, such as the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 (as amended), other Irish implementing legislation of the EU 5^{th} AML Directive and the Taxes Consolidation Act 1997 (as amended));

(b) such period as may be deemed by us to be necessary in light of applicable statutory limitation periods; and

(c) otherwise only for as long as the retention of such Personal Data is deemed necessary for the purposes for which that Personal Data are Processed (as described in this Privacy Policy).

9 Data Transfers outside the EEA

9.1 From time to time Personal Data may be transferred to, or accessed from countries outside the EEA, which may not have the same or equivalent Data Protection Law as Ireland. If such transfer occurs, the Fund will ensure that such processing of Personal Data is in accordance with Chapter V GDPR.

9.2 SIF may transfer your personal data to the following countries:

Categories of Personal Data	Country	Transfer Mechanism
Relevant Personal Data required for the applicable service	United States of America	European Commission Adequacy Decision for the EU-U.S. Data Privacy Framework under Article 45 GDPR, but only where the specific recipient is currently certified for the relevant data. Otherwise, an appropriate safeguard under Article 46 GDPR, such as the European Commission Standard Contractual Clauses, together

		with supplementary measures where required
Relevant Personal Data required for the applicable service	Switzerland	European Commission Adequacy Decision under Article 45 GDPR
Relevant Personal Data required for the applicable service	United Kingdom	European Commission Adequacy Decision under Article 45 GDPR
Tax and Regulatory Data; Identity and Contact Data; Financial and Transaction Data	Foreign tax jurisdictions under FATCA, CRS or other exchange-of-information arrangements	Disclosure to Irish Revenue under applicable legal obligations, followed by exchange by Irish Revenue under applicable international arrangements. The relevant destination depends on the Data Subject's circumstances and the applicable reporting regime.

10 **Contact Us/Complaints Procedure**

10.1 Further information about this Privacy Policy and/or the Processing of Personal Data by or on behalf of the Fund may be made available, if necessary, by contacting clientservices@seilernfunds.com. While investors may make a complaint in respect of compliance with Data Protection Law directly to the Irish Data Protection Commission or other competent Supervisory Authority, in particular in the Member State of your habitual residence, place or work or place of alleged infringement of the GDPR, investors will be requested to contact clientservices@seilernfunds.com in the first instance to give us the opportunity to address any concerns that they may have.

Annex I - Glossary

In this Privacy Policy, the terms below have the following meaning:

"**Data Breach**" means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise Processed.

"**Data Controller**" means the entity which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

"**Data Processor**" means the party that Processes Personal Data on behalf of the Data Controller.

"**Data Protection Law**" means the General Data Protection Regulation (No 2016/679) ("GDPR") and the Irish Data Protection Act 2018 and any other laws which apply to the Fund in relation to the Processing of Personal Data.

"**European Economic Area**" or "**EEA**" means Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, Iceland, Liechtenstein, and Norway.

"**Personal Data**" is any information relating to a living individual which allows the identification of that individual. Personal Data can include:

- a name, an identification number;
- details about an individual's location; or
- any other information that is specific to that individual.

"**Processing**" means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. "**Process**" and "**Processing**" are interpreted accordingly.

"**Special Categories of Personal Data**" are types of Personal Data that reveal any of the following information relating to an individual: racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership. Special Categories of Personal Data also include the Processing of genetic data, biometric data (for example, fingerprints or facial images), health data and data concerning sex life or sexual orientation.

Annex II - Types of Personal Data

	Categories of Personal Data	Type of Personal Data
1.	Identity Data	includes name, date and place of birth, nationality, residential and correspondence address, email address, telephone number, account or investor number, tax identification number, copies and details of passports or other identification documents, and similar information used to identify or contact an individual.
2.	Financial Data	includes bank account details, payment and transaction information, subscription, redemption and distribution information, investment holdings, source-of-funds information and, where relevant, information concerning assets and liabilities.
3.	AML Data	includes information processed in connection with anti-money laundering, counter-terrorist financing, sanctions and investor due-diligence requirements, including information relating to beneficial owners, controlling persons and authorised signatories, source of funds, source of wealth, politically exposed person status, sanctions and adverse-information screening, and related verification documentation.
4.	Traffic and Usage Data	includes technical and communications-related information generated through interactions with the Fund, the Manager, the Administrator or other service providers acting in connection with the Fund, including the date, time, method and duration of communications, electronic correspondence records, access and activity logs, device and system information and other similar data relating to the use of communication channels, investor portals or related services.

Annex III - Categories of Data Subject

	Categories of Data Subject	Type of Personal Data
1.	Shareholders	Identity Data, Financial Data, AML Data, Traffic and Usage Data
2.	Directors, designated persons and other individuals performing "**controlled functions**" within the Fund under the Central Bank of Ireland's Fitness & Probity regime.	Identity Data, Financial Data, AML Data
3.	Employees of Fund service providers.	Identity Data, Financial Data, AML Data