

Privacy Notice – United Kingdom and the European Union

Residents of the United Kingdom and the European Union

For the purposes of EU data protection law, we are required to provide certain specific information as to how we process personal and sensitive personal data of EU residents. We are a data controller in respect of your personal data. We collect and use your personal data and where applicable this may include information related to your employer and/or organisation, its directors, partners, employees, contractors and owners. We are responsible for ensuring that we use EU resident personal data in compliance with EU data protection law.

This notice applies to any EU resident personal data we receive from you, create or obtain from other sources, and explains how we use such personal data.

Personal data that we collect

What is personal data?

Personal data is information that can be used to identify a living individual. This can include your name, date of birth and contact details. It can also include information such as financial circumstances, bank details and records of communications, e.g. letters and e-mails.

What is sensitive personal data?

Sensitive or ‘Special Categories’ of data is information related to any of the following: health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, and data regarding sexuality or sex life. Brandywine Global typically does not request this type of personal data.

We will collect and use the following personal data about you:

Information you give us

- This is information that we record about you that you give us by filling in forms or by corresponding with us by phone, e-mail or otherwise.
- The information you give us may include your name, address, date of birth, tax identification numbers, primary and secondary nationality, e-mail address and phone number, employment history, credit history, any other relevant biographical data that would affect the service we provide you, and identification and address verification records.
- You may also provide us with certain special category data.
- You must ensure that in respect of any information you provide to Brandywine Global, which does not relate to you, you have obtained the necessary consent in order to disclose such information. You should refer them to this privacy notice before sharing such information with us.
- If you take part in any interactive features when engaging with Brandywine Global, for example sharing your computer screen, we may record the session in order to resolve complaints, improve our service

and for training and quality assurance purposes. Further information regarding this will be provided at the point in time of using that service.

We are required to ask you for your information in order to enter into an agreement with you or the organisation that you represent and to fulfil our regulatory obligations within that agreement. If you do not provide us with the information we reasonably ask for, we may be unable to provide you or your organisation with our services either wholly or in part.

Information we generate about you

- We may use information provided to us to maintain a record of contact details for you and/or your organisation. Additionally, we may use such personal information to provide you with information relating to our products and services and to assess, where appropriate, the suitability of the products and services provided.
- We generate data for statistical analysis:
 - Website Usage Information – Our website uses Google Analytics to automatically gather certain information such as the number and frequency of visitors, how they use the website and their domain addresses. This information is used as aggregated statistical information about users, providing usage by domain address. We do not, and do not seek, to identify individual users from this type of data. The information we gather helps us to measure how our website is used with a view to continually improving relevant content.

Information we receive from other sources

- Fraud Prevention Agencies – As part of our application and on-boarding process, we may access information recorded by fraud prevention agencies within and outside the EU. This may include information about any criminal convictions and any allegations regarding criminal activity that relate to you.
- Intermediaries – We will receive information from third party intermediaries, such as investment consultants and introducers. This information may include personal details such as contact details in order for us to provide you with our products and services.
- Social Media Profile – If you connect with us via a social media website, such as LinkedIn, we will receive your contact information provided as part of your user profile such as your name, email address and telephone number and any other relevant business information such as your organisation's name, address and your industry.
- Public databases – we may obtain information about individuals from public databases, or company websites. We use reputable sources including public repositories. We employ appropriate measures to assure the quality of information which we collect.
- Other members of Franklin Templeton¹.

¹ Brandywine Global is a wholly owned but independently operated Specialist Investment Manager of Franklin Resources, Inc.

How we use your personal data

Your personal data may be used by us in the following ways:

- **Crime Prevention and identity verification**
 - To verify your identity and address, and decide whether to enter into a client agreement with the organisation you represent, such as: carrying out credit reference, anti-money laundering, terrorist financing and fraud prevention checks (which may include sharing personal data with credit reference and fraud prevention agencies to automatically carry out these checks). If we are unable to verify your name and address we will ask you for further information to allow us to do this. Details of which agency we use to verify your name and address electronically are available on request. Details of our search with the agency will be kept on their records. To the best of our knowledge, any search we make will not affect your credit file.
 - To allow us, on an ongoing basis, to detect and prevent fraudulent activity including sharing personal data with fraud prevention agencies; and
 - To allow us, on an ongoing basis, to detect and prevent money laundering activity or terrorist financing.

- **Products & Services**
 - To manage, administer and take decisions regarding your, or your organisation's, account with us, such as: assessing your suitability for the products and services that you have requested, providing those products and services to you, and exercising our rights and performing our obligations under our client agreement with you or your organisation (e.g. buying, selling and transferring investments and keeping you up to date with how your investments are performing).
 - Where we are permitted to do so, to send promotional information about our products and services via the methods you specify (i.e. email, post, etc.); and
 - To contact you via post, e-mail or telephone in relation to the administration of your, or your organisation's account(s) or to carry out quality control research.

Legal basis for processing your personal data

We process your personal data pursuant to the following legal bases:

- Taking steps (at your request) prior to entering into an agreement with you, and subsequently for the administration and performance of our agreement with you;
- To comply with our legal and regulatory obligations;
- To establish, exercise or defend our legal rights and / or for the purpose of (or in connection with) legal proceedings; and
- The use of your personal data as described is necessary for our legitimate business interests which are:

- Enforcing the terms and conditions of any agreement we have with you;
- Improving customer service, market research, quality assurance, training staff, system development and statistical analysis of your personal data even if you or we subsequently decide not to enter in to a client agreement with you;
- To contact you about products and services that may be of interest to you.

Sharing your personal data

We may disclose your personal data, including special categories of data that you have consented to us processing within Franklin Templeton and to third party service providers outside of Brandywine Global in the circumstances described below:

- To ensure the delivery of products or services you have opted to receive from or through us;
- To ensure the safety and security of our data;
- As part of our client research and statistical analysis activity;
- Providing anonymised data to third parties for statistical analysis activity (this data would not allow any third party to identify you individually);
- In order to enforce or apply the terms of use and other agreements you have with us;
- To third party product providers or their brokers;
- To any intermediary, including investment consultants or other authorised representative acting on your behalf;
- For fraud prevention;
- With your consent, to any other service provider for the purposes of receiving information about their services which may be relevant to you;
- If we sell any of our business or assets, in which case we may disclose your personal data to the prospective buyer for due diligence purposes;
- If we are acquired by a third party, in which case personal data held by us about you will be disclosed to the third party buyer; and
- To third party agents or contractors for the purposes of providing services to us and to you.

These third parties will be subject to confidentiality requirements and they will only use your personal data as described in this privacy notice.

We will take steps to ensure that the personal data is accessed only by personnel that have a need to do so for the purposes described in this privacy notice.

We may also share your personal data outside of Brandywine Global to the extent required by law, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation (including

disclosures made to our regulators, tax authorities or credit agencies, and to establish, exercise or defend our legal rights).

Except as described above, no third parties we share your data with will use it for marketing purposes.

Transfer of personal data outside the European Economic Area

The information you provide to us will reside on our secure servers in the United States of America (“USA”). In addition, we also use the services of a number of third party service providers who process your personal data both inside and outside of the EU. We will require them to agree to protect your data in a manner that is consistent with how your personal data would be protected if it remained in the EEA. This can be done in a number of ways, for instance:

- The country that we send the data to might be approved by the European Commission or a relevant data protection authority;
- The recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal data; or
- Where the recipient is located in the USA, it might be a certified member of the EU-US Privacy Shield scheme.

In all cases, we will seek to ensure that any transfer of your personal data is compliant with EU data protection law.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA by contacting us at privacy@brandywineglobal.com

How long we keep your personal data

How long we hold your personal data for will vary. The retention period will be determined by various criteria including:

- The purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose.
- Legal obligations – laws or regulation may set a minimum period for which we have to store your personal data, for example, data relating to pension transfers is required to be kept for a longer period than other data.
- Legitimate business reasons - Due to the long term nature of the products and services we provide, to be able to answer any queries you may make, and to protect ourselves and you in the event of dispute, your data may be kept for longer than our regulatory minimum requirements.
- Communications and marketing – if you or the organisation you represent do not become a client of ours but you express interest in our services including any future events, seminars or webinars, we will hold your data to keep you abreast of new initiatives you might find interesting. We would keep your data on file for a minimum of 5 calendar years or until you ask us to remove your details/opt out of communications from us.

Your rights

You have a number of rights in relation to the personal data that we hold about you. These rights include:

- The right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- The right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so;
- In some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit this data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us;
- The right to request that we rectify your personal data if it is inaccurate or incomplete;
- The right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it;
- The right to request that we restrict our processing of your personal data in certain circumstances. Please note that there may be circumstances where you ask us to restrict our processing of your personal data but we are legally required to refuse that request;
- The right to object to our processing of your personal data where we process your personal data pursuant to our legitimate business interests. Please note that there may be circumstances where you object to our processing of your personal data but we are legally entitled to refuse that request;
- The right to object to any automated decision making (including profiling) which we conduct based on your personal data, which significantly affects you. Please note that there may be circumstances where you object to us conducting automated decision making but we are legally entitled to refuse that request;
- The right to object to the processing of your personal data for direct marketing purposes; and
- The right to lodge a complaint with the data protection regulator if you think that any of your rights have been infringed by us.

In the event you seek to limit our processing capabilities by exercising your rights to do so you should be aware that we may not be able to provide some or all of our services to you.

You can find out more information about your rights by contacting the data protection regulator in your home state within the EEA. If you require assistance in identifying your local data protection regulator we can help you by emailing privacy@brandywineglobal.com