

Ashfield Capital Partners, LLC

European Union (EU) General Data Protection Notice

This EU Data Protection Notice describes how Ashfield Capital Partners, LLC (“Ashfield”) treats personal data of individuals in the European Economic Area (“EEA”). The information in this EU Notice is provided pursuant to the European Union’s General Data Protection Regulation (“GDPR”). This EU Notice sets out the basis on which personal data about you will be processed by Ashfield.

Ashfield collects and processes personal data when processing is necessary for the performance of investment advisory services for your account. Ashfield also collects and processes your personal data in order to comply with applicable regulatory requirements.

Ashfield may process the following personal data about you:

- Information provided by you to Ashfield. This information may include your name and address, contact details, date of birth, gender, nationality, photograph, signature, occupational history, job title, income, assets, other financial information, bank details, investment history, tax residency and tax identification information. Such information might be provided in documents (e.g., account opening documents), face-to-face, by telephone, by email or otherwise.
- Information that Ashfield collects or generates. This might include information relating to your emails and related data, call recordings and website usage data.
- Information that Ashfield obtains from other sources. This might include information obtained by Ashfield from public websites and other public sources and information received from your advisers or from intermediaries.

From time to time, Ashfield may, in accordance with the purposes described above, disclose your personal data to other parties, including (i) service providers that provide professional, audit, accounting, and tax services; (ii) other services providers, including technology service providers; (iii) custodians and counterparties; and (iv) courts and regulatory, tax, and governmental entities. Some of these persons will process your personal data in accordance with Ashfield’s instructions and others will themselves be responsible for their use of your personal data. These persons may be permitted to further disclose such personal data to others.

Your personal data may be transferred to and stored by persons outside the EEA. Where personal data is transferred outside the EEA, Ashfield will take appropriate safeguards with respect to such transfer.

Ashfield processes and stores personal data for as long as required to provide services and in accordance with regulatory and legal requirements (as the laws or regulations may set a minimum period for which Ashfield has to keep your personal data).

You have a number of legal rights in relation to the personal data that Ashfield holds about you. These rights include the following:

- You have the right to obtain information regarding processing of your personal data and access to your personal data that Ashfield holds.
- You have the right to ask for incorrect, inaccurate, or incomplete personal data to be corrected.
- You have the right to request that personal data be erased. Notwithstanding this request, Ashfield may have a legal obligation to retain such data.
- You have the right to request the restrictions of the processing of your personal data in specific areas. However, under certain circumstances, Ashfield may be legally entitled to continue processing your personal data.
- You have the right to receive your personal data in a machine-readable format and send it to another controller. This right applies to personal data which you have provided to Ashfield.
- You have the right to lodge a complaint with a data protection regulator if you think your rights have been infringed by Ashfield.

Please contact compliance@ashfield.com with any questions regarding this EU Privacy Notice.