

## DATA PRIVACY STATEMENT

In accordance with the General Data Protection Regulation (697/2016/EU) (the “**GDPR**”) and applicable Irish data protection legislation (currently the Irish Data Protection Act 2018) (collectively, “**Data Protection Legislation**”) UTI Goldfinch Funds plc (the “**Fund**”) being a data controller, must provide you with information on how the personal data that you provide as part of your subscription to shares in the Fund will be processed by the Fund, its service providers and delegates and their duly authorised agents and any of their respective related, associated or affiliated companies.

As a consequence of your investment, the Fund acting as a data controller may itself (or through third parties including but not limited to Citibank Europe plc (the “**Administrator**”), the Company Secretary, the Money Laundering Reporting Officer, Bridge Consulting Limited (the “**Governance Services Provider**”), UTI International (Singapore) Private Limited (the “**Investment Manager**”), UTI International Limited (the “**UK Facilities Agent**”), local paying agents and mailing firms appointed by any of the foregoing (together the “**Service Providers**”)) process your personal information or, to the extent that you are a non-natural person, that of your directors, officers, employees, intermediaries and/or beneficial owners. Save where otherwise expressly provided, any reference in this Data Privacy Statement to “you” or “your” in the context of processing personal data of data subjects shall be understood to mean and relate to the personal data of your directors, officers, employees, intermediaries and/or beneficial owners as the context may require.

In certain circumstances, the Investment Manager may itself use your personal data for its own purposes and as a result be considered a data controller of such data. In such circumstances, all rights afforded to you as a data subject under the GDPR shall be solely exercisable against the Investment Manager.

In this regard, please note the following:

### **Purposes of Processing and Legal Basis for Processing**

The personal data collected from you or provided by you or on your behalf in connection with your holdings in the Fund will be collected, stored, disclosed, used and otherwise processed by the Service Providers for the purposes outlined in the table below.

<b>Processing Activity by or on behalf of the Fund</b>	<b>Legal Basis for Processing</b>
Where you are a natural person, managing and administering your holdings in the Fund and any related account on an ongoing basis.	Performance of the contract between the Fund and you.
Where you are a natural person, disclosures to third parties such as auditors, regulatory authorities, tax authorities and technology providers in the context of the day to day operations of the Fund;	Performance of the contract between the Fund and you.

Processing Activity by or on behalf of the Fund	Legal Basis for Processing
Where you as an investor are a non-natural person, disclosures to third parties such as auditors, regulatory bodies, tax authorities and technology providers in the context of the day to day operations of the Fund.	Pursuing the legitimate interests of the Fund in managing and administering the holdings of the non-natural persons in the Fund and any related account on an ongoing basis.
Complying with any applicable legal, tax or regulatory obligations imposed on the Fund including legal obligations under Fund law, the UCITS Regulations, CBI UCITS Regulations, under tax law and under anti-money laundering / counter terrorist financing legislation.	Compliance with a legal obligation to which the Fund is subject.
(i) Recording, maintaining, storing and using recordings of telephone calls and electronic communications that you make to and receive from the Fund, the Service Providers and their delegates or duly appointed agents and any of their respective related, associated or affiliated companies for any matters related to investment in the Fund, dispute resolution, record keeping, security and/or training purposes.	Pursuing the legitimate interests of the Fund including: (i) For the Fund or its delegate to enjoy the benefit of, enforce or defend its rights and perform its obligations in connection with the contract between the Fund and you.  Further information relating to the balancing test undertaken by the Fund in respect of such processing is available upon request.

**Please note that where personal data is processed for purposes of legitimate interests, you have a right to object to such processing and the Fund and its appointed Service Providers will no longer process the personal data unless it can be demonstrated that there are compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.**

### **Consent**

Your consent is not required to process your personal data for the purposes referenced above. However, in order to process your personal data for the purposes outlined below, the Fund and the Investment Manager seek your consent.

#### **Consent to Direct Marketing by or on behalf of the Fund**

The Fund seeks your consent in order to send you information about other sub-funds within the Fund by letter, by telephone, by email or by other reasonable means of communication.

**You have a right not to receive such information.** If you consent to receive such information and / or marketing material, please tick here and provide your contact details below:

#### **Consent to Direct Marketing by the Investment Manager or entities within its group**

The Fund and the Investment Manager seek your consent to the transfer of your personal data to, and use by, the Investment Manager and other entities within its group to send you information about

other investment products or investment services by letter, by telephone, by email or by other reasonable means of communication.

**You have a right not to receive such information.** If you consent to receive such information and / or marketing material, please tick here and provide your contact details below:

Please return this section by hand, post or courier, for the attention of Manish Khandelwal at UTI International (Singapore) Pte Ltd, 3 Raffles Place, #08-02 Bharat Building, 048617 Singapore or by e-mail at manish.khandelwal@utifunds.com.sg at your earliest convenience.

FIRST NAME: \_\_\_\_\_ LAST NAME: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

PHONE NUMBER: \_\_\_\_\_

EMAIL ADDRESS: \_\_\_\_\_

You have a right to withdraw the consent(s) provided above at any time. However, your withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal. You can withdraw your consent by contacting the Fund using the details outlined under "Contact Us" below.

**You also have a right to object to the processing of your personal data by the Fund or the Investment Manager or any other entity within its group for direct marketing purposes.**

The performance of this contract with the Fund is **NOT** conditional on your consent to direct marketing

### **Profiling and Screening**

The Fund and its appointed Service Providers may engage in PEP screening and financial sanctions screening programs defined by the European Union ("EU"), the United Nations ("UN"), Her Majesty's Treasury ("HMT") and the Office of Foreign Assets Control ("OFAC") for the purposes of complying with for the purposes of complying with the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 as may be amended or replaced from time to time and with UN, EU and other applicable sanctions regimes. The implementation of such PEP screening and financial sanctions screening programmes may result in the Fund or its Service Providers refusing an application for Shares in the Fund or delaying or refusing to make any redemption payment or distribution payment to you if you, your directors or any beneficial owner of your Shares appear on such screening programmes. In the event that you are identified as a PEP as a result of the screening process, you may be required to provide additional information and/or documentation to the Fund or its Service Providers Such processing, which may reveal your political opinion, is considered lawful on the grounds of substantial public interest permitted under Article 9(2)(g) of the GDPR.

### **Undertaking in connection with other parties**

By providing personal data to the Fund, you undertake to be authorised to disclose to the Fund relevant information applicable to the beneficial owner of the investment, to your directors and authorised signatories and to persons that own, directly or indirectly, an interest in the Fund. In this respect you confirm that you have provided these persons with all the information required under applicable data

protection law, notably regarding their data protection rights, and received from these persons their authorisation for the processing and transfer of their personal data to us.

### **Disclosures to Service Providers and / or Third Parties**

Personal data relating to you which is collected from you or provided by you or on your behalf may be handled by Service Providers appointed by the Fund and its or their duly appointed agents and any of related, associated or affiliated companies within the Citi or UTI group(s) for the purposes specified above.

These Service Providers will be obliged to adhere to the data protection laws of the countries in which they operate.

The Fund may disclose your personal data to other third parties where required by law or for legitimate business interests. This may include disclosure to third parties such as auditors and the Central Bank of Ireland, regulatory bodies, taxation authorities and technology providers.

### **Transfers Abroad**

Personal data collected from you or provided by you or on your behalf may be transferred outside of Ireland including to companies situated in countries outside of the European Economic Area (“**EEA**”) which may not have the same data protection laws as in Ireland. These countries include Singapore, India and the Middle East regions.

Where data transfers outside of the EEA take place, the Fund has taken the necessary steps to ensure that appropriate safeguards have been put in place to protect the privacy and integrity of such personal data, in particular the implementation of [binding corporate rules between companies within the Citi or UTI Group and/or ensuring the implementation of model contracts by the Service Providers and their affiliates. Please see contact details in the “Contact us” should you wish to obtain information concerning such safeguards.

### **Data Retention Period**

The Fund and its appointed Service Providers will retain all information and documentation provided by you in relation to your investment in the Fund for such period of time as may be required by Irish legal and regulatory requirements, being at least six years after the period of your investment has ended or the date on which you had your last transaction with us.

### **Your data protection rights**

Please note that you have the following rights under the GDPR. In each case, the exercise of these rights is subject to the provisions of the GDPR:

- (i) You have a right of access to and the right to amend and rectify your personal data.
- (ii) You have the right to have any incomplete personal data completed.

- (iii) You have a right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you carried out by the Fund infringes the GDPR.
- (iv) You have a right to be forgotten (right of erasure of personal data).
- (v) You have a right to restrict processing.
- (vi) You have a right to data portability.
- (vii) You also have the right to object to processing where personal data is being processed for direct marketing purposes and also where the Fund is processing personal data for legitimate interests.

Where you wish to exercise any of your data protection rights against the Fund, please contact us via the details provided below under “Contact Us”.

The Fund or its Service Provider will respond to your request to exercise any of your rights under the GDPR in writing, as soon as practicable and in any event **within one month** of receipt of your request, subject to the provisions of the GDPR. The Fund or its Service Provider may request proof of identification to verify your request.

#### **Failure to provide personal data**

As outlined in the section titled “**Purposes of Processing and Legal Basis for Processing**”, the provision of personal data by you is required for us to manage and administer your holdings in the Fund and so that we can comply with the legal, regulatory and tax requirements referenced above. Where you fail to provide such personal data in order to comply with anti-money laundering/counter terrorist financing or other legal requirements, in certain circumstances, we may be prohibited from making redemption or any applicable dividend payments to you and/or may be required to discontinue our business relationship with you by compulsorily redeeming your shareholding in the Fund.

#### **Contact us**

If you have any questions about our use of your personal information by the Fund or by the Investment Manager, please contact Manish Khandelwal at the following email address/using the following contact telephone number:-manish.khandelwal@utifunds.com.sg / +65 65339190