

# The Brunner Investment Trust PLC



Any and all information concerning the investor as an individual or any other data subject (the "Personal Data"), in the course of the business relationship with the Company will be processed by the Company as data controller (the "Controller") in compliance with the Regulation (EU) 2016/679 of 27 April 2016 (the "General Data Protection Regulation") as well as any applicable law or regulation relating to the protection of personal data (collectively the "Data Protection Law").

The Company may store on computer systems and process, by electronic or other means, personal data concerning the investors and their representative(s) (including, without limitation, legal representatives and authorised signatories), employees, directors, officers, trustees, settlors, their shareholders, and/or unitholders for, nominees and/or ultimate beneficial owner(s) (as applicable) (hereafter the "Data Subjects").

Personal Data provided or collected in connection with an investment in the Company may be processed by the Company's sub-processors which includes the Company Secretary, the Depository, the Administrator, the Distributor, the Registrar, the Auditor, legal and financial advisers and other service providers of the Company (including its information technology providers) and, any of the foregoing respective agents, delegates, affiliates, subcontractors and/or their successors and assigns (hereafter the "Service/Providers"). The Service Providers may act, in certain circumstances, as data controller, in particular for compliance with their legal obligations in accordance with applicable laws and regulations (such as anti-money laundering identification or the provision of legal services) and/or order of competent jurisdiction. Where the Service Providers as data controller, their use and processing of the Personal Data will be subject to their respective data privacy notices or statements.

The Personal Data that may be collected and processed by or on behalf of the Controller include: name, date of birth, civil status, nationality, contact details (including postal or email address), banking details, passport or other identification document, invested amount and holdings in the Company.

Personal Data are processed for the purposes of (i) offering investments in the Company and performing the related services including, but not limited to, processing subscriptions and redemptions, managing and administering investor's holding in the Company and providing financial and other information to investors (ii) other related services resulting from any agreement entered into between the Controller and a service provider that is communicated or made available to the investors (hereafter the "Investment Services"). Personal Data may also be processed to comply with legal or regulatory obligations including, but not limited to, legal obligations under applicable law, prevention of terrorism financing law, anti-money laundering law (such as carrying out customer due diligence), prevention and detection of crime, and tax law (such as reporting under the FATCA Law and the CRS Law). To assist in confirming identity the Controller or its Service Providers may make searches with credit reference agencies who will supply the Controller with credit information, as well as information from other sources including the Electoral Register. The Controller may also pass information to law enforcement agencies.

In the event that a data subject is identified as a politically exposed person as a result of the customer due diligence check, the investor is may be required to provide additional information and/or documentation to the Company or its Service Providers/

Processors. Such processing, which may reveal political opinions or any trade union memberships (special category of personal data), is considered lawful on the grounds of substantial public interest permitted under GDPR.

The Controller or its Service Providers collects, uses, stores, retains, transfers and/or otherwise processes Personal Data: (i) on the basis of investors' consent and/or; (ii) as a result of the subscription of investors to the subscription agreement where necessary to perform the Investment Services or to take steps at the request of investors prior to such subscription, including the holding of shares in general and/or; (iii) to comply with a legal or regulatory obligation of Controller or Processors and/or; (iv) in the event the subscription agreement is not entered into directly by the concerned Data Subject, Personal Data is processed for the purposes of the legitimate interests pursued by Controller, which mainly consist in the performance of the Investment Services and related services or compliance with foreign laws and regulations and/or any order of a foreign court, government, supervisory, regulatory or tax authority, including when providing such Investment Services to any beneficial owner and any person holding shares directly or indirectly in the Company.

Answering questions and requests with respect to Data Subjects' identification and shares held in the Company, FATCA and/or CRS is mandatory. Investors acknowledge and accept that failure to provide relevant Personal Data requested in the course of their relationship with the Company may prevent them from maintaining their shares in the Company and may be reported by the Company to the relevant authorities. Any relevant information in relation to investor's investments in the Company will be reported to competent local authorities which will exchange this information on an automatic basis with the competent authorities in the United States or other permitted jurisdictions as agreed in the FATCA Law, CRS at OECD and EU levels or UK legislation.

Investors acknowledge that the Controller or its Service Providers may record telephone conversations for the primary purpose of providing evidence in the event of a dispute based on legitimate interests pursued by the Controller. Any such recordings shall be retained in compliance with applicable laws and regulations.

For the purposes listed above, Personal Data will be transferred to any of the aforementioned recipients and Service Providers in any jurisdiction. The Controller may transfer Personal Data outside EEA (i) on the basis of an adequacy decision of the European Commission with respect to the protection of personal data and/or on the basis of the EU-U.S. Privacy Shield framework or, (ii) on the basis of appropriate safeguards according to Data Protection Law, such as standard contractual clauses, binding corporate rules, an approved code of conduct, or an approved certification mechanism - the investors and investor-related individuals whose data may be covered by such transfer may obtain a copy of such safeguards by contacting the Company at the above contact details or, (iii) on the basis of the investor's explicit consent or, (iv) for the performance of the Investment Services or for the implementation of pre-contractual measures taken at the investors' request or, (v) for the Service Providers to perform their services rendered in connection with the Investment Services or, (vi) for important reasons of public interest or, (vii) for the establishment, exercise or defence of legal claims or, (viii) where the transfer is made from a register, which is legally intended to provide information to the public or, (ix) for the purposes of compelling legitimate interests pursued by the Controller, to the extent permitted by Data Protection Law..

Insofar as Personal Data provided by investors include Personal Data concerning other Data Subjects, investors represent that they have authority to provide Personal Data of such Data Subjects to the Controller and confirm that they have undertaken to (i) inform any such Data Subject about the processing of their Personal Data and their rights as described in this Privacy Notice, in accordance with the information requirements under the Data Protection Law and (ii) where necessary and appropriate, obtained in advance any consent that may be required for the processing of Personal Data in accordance with the requirement of Data Protection Law with regard to the validity of consent, in particular, for the transfer of Personal Data to the Authorised Recipients located outside of the EEA. The Controller may assume, where applicable, that Data Subjects have, where necessary, given such consent and have been informed of the processing and transfer of their Personal Data and of their respective data subject rights.

To the extent this is required by applicable data protection laws and regulations, we will separately ask you for your consent and provide information as to what happens if you do not give consent.

Each Data Subject may request (i) access to any Personal Data stored about it, including obtaining a copy of such Personal Data and further additional information about the processing pursuant to the applicable law, (ii) rectification of incorrect Personal Data, (iii) deletion of any Personal Data concerning the Data Subject if such Personal Data are no longer needed for the purposes for which they were stored, (ii) a restriction of the processing of Personal Data concerning the Data Sub-

ject to certain purposes and, (iii) to receive its Personal Data for itself or another third party elected by the Data Subject in a structured, commonly used and machine readable format or to transmit those Personal Data to another controller in accordance with Data Protection Law and (iv) to obtain a copy of or access to the appropriate or suitable safeguards which have been implemented for transferring the Personal Data outside of the EEA, in the manner and subject to the limitations prescribed in accordance with Data Protection Law. In particular, Data Subjects may at any time object, on request and free of charge, to the processing of their Personal Data for marketing purposes (in which case the Controller will cease the processing of such Personal Data for such purposes immediately) or for any other purpose carried out on the basis of the legitimate interests of the Controller (in which case the Controller will cease the processing if no overriding legitimate interests for the data processing exist).

In case the processing of Personal Data is based on consent, data subjects are entitled to withdraw their consent at any time without prejudice to the lawfulness of the processing based on consent before withdrawal.

Each Data Subject should address such requests to the Company Secretary Kirsten Salt, Allianz Global Investors GmbH, 199 Bishopsgate, London, EC2M 3TY or via email: [Investor.Services@allianzgi.com](mailto:Investor.Services@allianzgi.com)

Investors are entitled to address any claim relating to the processing of their Personal Data carried out by the Controller in relation with the Investment Services to the relevant data protection supervisory authority (i.e. in UK, the Information Commissioner's Office).

The Controller will retain all information and documentation provided in relation to an investment in the Company for such period of time as may be required to provide services to the investor and as required by applicable legal and regulatory requirements. Personal data processed for AML and KYC purposes will be retained for five (5) years after the end of the contract with the investor. 18-1634