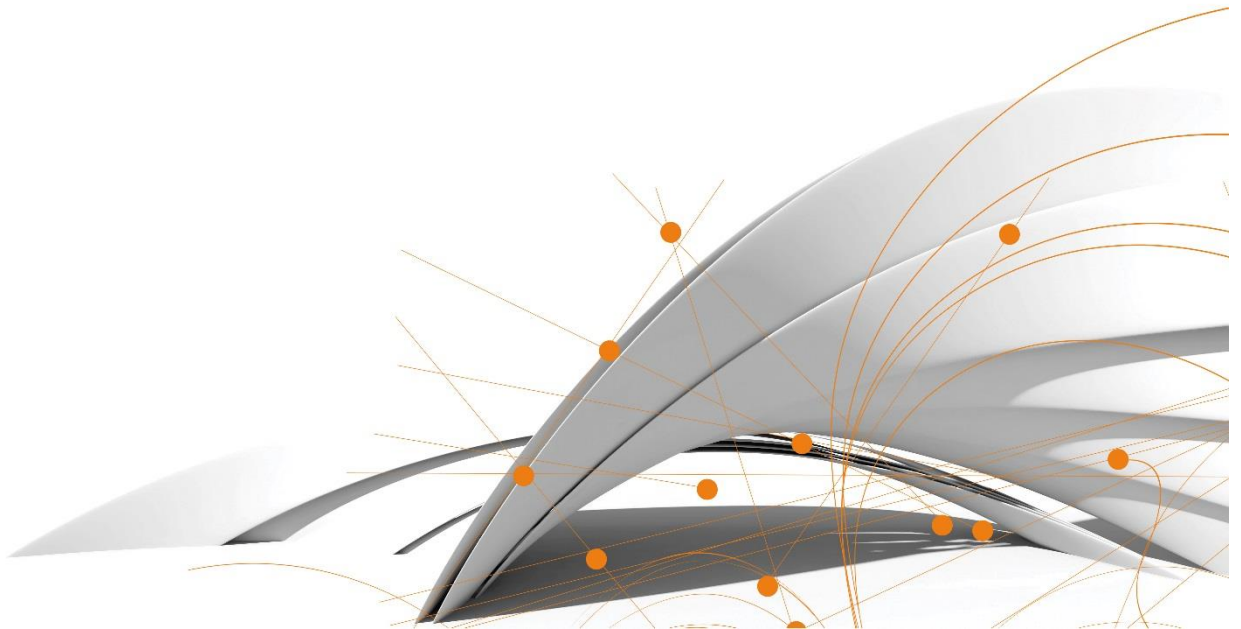


TOBAM Client Privacy Notice
April 2018



This privacy notice details the use of client provided information.

Who are we?

TOBAM is an asset management firm with its head office located at 49-53 avenue des champs Elysées 75 008 Paris France.

You can contact us by post or by email at dataprotection@TOBAM.fr with any enquiries with regards to the use of information and personal data.

What personal data do we collect?

We request clients' full name, email address, mailing address, contact telephone number. For anti-money laundering purposes, we may ask you for more information for verification of identification purposes such as: your passport / driving licence / national ID card. In some cases a separate proof of address may be required.

Why do we collect this information?

We will use your information as required by law and regulations to send you reports on your investment, to report to regulators and to maintain adequate records.

What do we do with your information? Do we transfer your personal information outside of the EU?

Your information is stored in our internal system which is based in the European Union. We do not use the information you provide to make any automated decisions that might affect you.

TOBAM legitimate Interest:

We use your personal information for our legitimate interest:

- Call recording: for compliance purposes, we record telephone conversations.
- Sharing required information with our brokers and administrators to execute your orders.

How long do we keep your personal information?

Your personal information will be retained in accordance with our data retention policy which categorizes all of the information held by TOBAM and specifies the appropriate retention period for each category of data. Those periods are based on the requirements of applicable data protection laws and the purpose for which the information is collected and used, taking into account legal and regulatory requirements to retain the information for a minimum period, limitation periods for taking legal action, good practice and TOBAM's business purposes.

Your rights over your information

By law, you can enquire about the information we hold about you, and you can ask us to correct it if it is inaccurate.

You can also ask us to provide you with a copy of the information and to stop using your information for a period of time if you believe we are not doing so lawfully.

You can have your personal information deleted if it is incorrect, if it is no longer needed or has been processed unfairly or unlawfully.

You can ask us to send the personal information you sent us to another company depending on the data category and once it can be transferred in a secure way.

To submit a request by email, post or telephone, please use the contact information provided above.

We must ensure that your personal information is accurate and up to date. Therefore, please advise us of any changes to your information by emailing: dataprotection@TOBAM.fr

Your right to complain

If you have a complaint about our use of your information, you can contact the French “Commission Nationale de l’Informatique et des Libertés” (CNIL): CNIL - 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07