

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 Acts 1988 to 2003) (collectively, “**Data Protection Legislation**”) Prusik Umbrella UCITS Fund 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 Brown Brothers Harriman Fund Administration Services (Ireland) Limited (the “**Administrator**”), and Prusik Investment Management LLP together with any sub-distributors that may be appointed from time to time (collectively the “**Distributor**”), 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 Administrator 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 Administrator.

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 on behalf of the Fund for the purposes outlined in the table below.

1. Processing Activity by or on behalf of the Fund	Legal Basis for Processing
(a) 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
(b) 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.
(c) 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 person in the Fund and any related account on an ongoing basis.
(d) 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

The Administrator, as a data controller of your personal data may also collect, store, disclose, use or otherwise process your personal data for the purposes outlined in the table below.

2. Processing Activity by the Administrator	Legal Basis for Processing
(a) Complying with any applicable legal or regulatory obligations imposed on the Administrator including under tax law, under anti-money laundering / counter terrorist financing legislation or by virtue of its status as a regulated entity	Compliance with a legal obligation to which the Administrator is subject, being those legal obligations imposed on it under AML/CTF legislation.

Please note that where personal data is processed for purposes of legitimate interests, as referred to in 1 (c) above, 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.

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**”), UK Government and the US Office of Foreign Assets Control (“**OFAC**”) 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 Prusik and Administrator's group(s) for the purposes specified above. The Administrator may in turn disclose your personal data to agents or other third parties where necessary to carry out these purposes, including to: Brown Brothers Harriman & Co., Brown Brothers Harriman (Luxembourg) S.C.A., Brown Brothers Harriman (Poland) Sp. Z.o.o., and/or Brown Brothers Harriman (Hong Kong) Limited.

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

The Fund and/or the Administrator 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, the Depositary and technology providers.

Your personal data may also be transferred to the Depositary for its own purposes as data controller.

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 the United States of America and Singapore.

Where data transfers outside of the EEA take place, the Fund and/or the relevant Service Provider are required to take necessary steps to ensure that appropriate specific safeguards stipulated under the GDPR have been put in place to protect the privacy and integrity of such personal data.

Please contact reporting@bridgefsconsulting.ie 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.

The Administrator will retain all information and documentation provided by you for compliance with those legal obligations imposed on it under AML/CTF legislation for a period of at least five years after the period of your investment has ended or the date on which you had your last transaction with the Fund.

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 or a Service Provider is processing personal data for legitimate interests.

Where you wish to exercise any of your data protection rights against the Fund or against the Administrator 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 the Fund’s use of your personal information, please contact Mark Derryhouse at the following email address/using the following contact telephone number: - mark.derryhouse@prusikim.com or +44(0)207 493 1331

If you have any questions about the Administrator’s use of your personal information, please visit <https://www.bbh.com/en-us/our-firm/policies-and-disclosures> or contact Brown Brothers Harriman Fund Administration Services (Ireland) Limited directly at BBHglobalTA@bbh.com.