

## DATA PROTECTION NOTICE

### Comgest Growth plc (the "Fund")

#### 1. Purpose of Notice

This notice sets out details on how personal information relating to you, as a shareholder in the Fund, or that of your directors, officers, employees and / or beneficial owners ("**Personal Data**") will be handled by the Fund, as controller of the Personal Data (as specified in Section 3 of this notice below) and / or on its behalf by its third party service providers as and from 25 May 2018.

#### 2. Personal Data Processed by the Fund

The Fund processes your Personal Data as provided to it or its relevant service providers on your completed investor application form, Personal Data that it collects, generates or observes while administering your investor account and other Personal Data you provide to the Fund or its third party service providers acting on the Fund's behalf such as AML / KYC information. This information includes, but is not limited to:

- a. **Information provided to the Fund by you:** this might include, but is not limited to, your name and address (including proofs of 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.
- b. **Information that the Fund collects, generates or observes:** this might include, but is not limited to, information relating to your investment in the Fund, emails, call recordings and website usage data.
- c. **Information that the Fund obtains from third party sources:** this might include, but is not limited to, information obtained for the purpose of the Fund's AML / KYC procedures, information from public websites, social media and information received from your advisers or from intermediaries such as credit reference agencies, AML screening tools etc.

#### 3. Why the Fund Processes your Personal Data

The Fund collects and processes your Personal Data on various legal bases and for numerous different purposes, including those set out below.

Legal Basis	Purpose(s)
<p><b>Performance of a Contract</b> The Fund must process your Personal Data in order to enter into and perform its contract with you as a shareholder in the Fund.</p>	<ul style="list-style-type: none"> <li>• To assess the initial application for shares and to facilitate the opening of the account with the Fund.</li> <li>• To facilitate the management and administration of holdings and dealing in the Fund including, without limitation, the processing of redemption, conversion, transfer and additional subscription requests, the payment of distributions and the processing and verification of instructions.</li> </ul>

#### Comgest Growth plc

*(an investment company with variable capital and having segregated liability between its sub-funds)*

Registered Offices: 2 Grand Canal Square, Dublin 2, Ireland

Company Registration No: 323577

Directors: S Champetier de Ribes (French), J-P Dolf (German), P Lebeau (French), D Morrissey, D Raper (New Zealander), B Wright

<p><b>Legitimate Interests</b> The Fund may process your Personal Data in order to exercise or preserve its legitimate business interest(s).</p>	<ul style="list-style-type: none"> <li>• To make relevant disclosures in the course of a merger, acquisition or bankruptcy of the Fund or any sub-fund.</li> <li>• To validate and verify information for security purposes, including for the prevention of fraud.</li> <li>• To manage the Fund, including monitoring and resolving complaints.</li> <li>• To send administrative information relevant to the investment in the Fund.</li> <li>• To exercise or defend a legal claim, including in the context of litigation, arbitration and similar proceedings.</li> </ul>
<p><b>Compliance with Legal Obligation</b> The Fund may process your Personal Data in order to comply with its relevant legal and regulatory obligations.</p>	<ul style="list-style-type: none"> <li>• To ensure compliance with the Fund's business, tax and regulatory obligations, including its FATCA/CRS reporting obligations.</li> <li>• To assist the Fund's auditors in the auditing of the Fund in accordance with its legal obligations.</li> <li>• To investigate, detect, prevent or prosecute crimes in relation to the prevention of fraud, money laundering and/or terrorist financing, including "know your customer" and other necessary onboarding and ongoing investor checks.</li> </ul>

#### 4. Third Party Recipients of your Personal Data

The Fund may disclose your Personal Data to its relevant service providers and/or other third parties including, but not limited to:

- the Administrator, Registrar and Transfer Agent, currently RBC Investor Services Limited and its affiliates;
- the Depository, currently RBC Investor Services Bank S.A., Dublin Branch and its affiliates;
- the Auditors, currently Deloitte;
- the Legal Advisors, currently William Fry;
- the Secretary, currently Wilton Secretarial Limited;
- the MLRO, currently Shane Keyes, an employee of Carne Group;
- the Investment Manager and Global Distributor, currently Comgest Asset Management International Limited;
- any sub-investment manager or investment adviser of the Company;
- any relevant paying agent, representative or distributor;
- the Irish Revenue and other national revenue authorities;
- national regulators, including the Central Bank of Ireland;
- An Garda Síochána.

The Fund or its service providers may also disclose your Personal Data to any other persons or entities as agreed between the Fund and the relevant service provider, or as may be required or expressly permitted by applicable laws.

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## 5. International Transfer of your Personal Data

The disclosure of your Personal Data to the third party recipients set out above may involve the transfer of data to the USA, Switzerland, Hong Kong, Malaysia and other jurisdictions outside the European Economic Area ("EEA"), which are not the subject of an adequacy decision by the EU Commission. Such countries may not be subject to equivalent data protection laws as countries within the EEA. Any transfer of your Personal Data to jurisdictions outside the EEA may only occur in accordance with the requirements of the GDPR. For example, in connection with the transfer of your Personal Data to jurisdictions outside the EEA, the Fund has authorised the Administrator as its delegate to enter into standard contractual clauses, as prescribed under the GDPR, with relevant parties to whom your Personal Data will be transferred. Copies of these clauses may be sought from the Administrator by emailing [fundops@comgest.com](mailto:fundops@comgest.com). The Fund has authorised the Administrator and the Depositary to transfer Personal Data to their affiliates.

## 6. Retention of your Personal Data

The Fund will retain Personal Data for as long as necessary or permitted in light of the purpose(s) for which it was obtained. The criteria used to determine the retention periods include:

- the length of the Fund's relationship with you;
- whether there is a legal obligation to which the Fund is subject (such as retaining Personal Data obtained for the performance of AML and related checks, which will be kept for **5 years** after termination of the relationship); and
- whether retention is advisable in light of the Fund's legal position (such as with respect to statutes of limitations, litigation or regulatory investigations), in which case the Personal Data may be kept for up to **7 years**.

## 7. Your Data Protection Rights

You have a number of rights in relation to your Personal Data, which are set out in the table below. **In particular these rights include the right to object to processing of your Personal Data where that processing is carried out for the Fund's legitimate interests.** Note that in certain circumstances these rights might not be absolute.

Right	Further Information
<b>Right of Access</b>	You have the right to request a copy of the Personal Data held by the Fund about you and to access the information which the Fund holds about you free of charge. The Fund may charge you for making any additional access requests where it feels your request is unjustified or excessive.
<b>Right to Object</b>	You have a right to object at any time to the processing of your Personal Data where the Fund processes your Personal Data on the legal basis of pursuing the Fund's legitimate interests.
<b>Right to Rectification</b>	You have the right to have any inaccurate Personal Data which the Fund holds about you updated or corrected.
<b>Right to Erasure</b>	In certain circumstances, you may also have your personal information deleted, for example if you exercise your right to object (see above) and the Fund does not have an overriding reason to process your Personal

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	Data or if the Fund no longer requires your Personal Data for the purposes as set out in this notice.
<b>Right to Restriction of Processing</b>	You have the right to ask the Fund to restrict processing your Personal Data in certain cases, including if you believe that the Personal Data the Fund holds about you is inaccurate or the Fund's use of your information is unlawful. If you validly exercise this right, the Fund will store your Personal Data and will not carry out any other processing until the issue is resolved.
<b>Right to Data Portability</b>	You may request the Fund to provide you with your Personal Data which you have given the Fund in a structured, commonly used and machine-readable format and you may request the Fund to transmit your Personal Data directly to another data controller where this is technically feasible. This right only arises where: (1) the Fund processes your Personal Data with your consent or where it is necessary to perform the Fund's contract with you; and (2) the processing is carried out by automated means.

Where the Fund requires your Personal Data to comply with anti-money laundering or other relevant legal requirements, failure to provide this information may prevent your application for any future dealing of shares in the Fund and will result in your investor account being frozen such that no dividend or redemption proceeds will be paid to you.

Should you consider that the processing of your Personal Data by the Fund or its service providers infringes the provisions of the GDPR, you may lodge a complaint with a supervisory authority in the EU Member State of your habitual residence, place of work, or in the place where an alleged infringement occurred.

## 8. Contact Us

If you have any questions in relation to the Fund's use of your Personal Data, or would like to submit a request with respect to your rights above, please contact us at [fundops@comgest.com](mailto:fundops@comgest.com).

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