

CORUM BUTLER

CORUM Butler Asset Management Limited

GDPR Policy

25 March 2020

Version 2.0

Version	Date	Comment
1.0	31 July 2019	Board Approval
2.0	25 March 2020	Annual Board review and approval

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Introduction

This procedure sets out the process for adherence to the provisions of the General Data Protection Regulation by CORUM Butler Asset Management Limited (the “Company”) and its employees.

As a data controller, the Company must comply with all applicable laws and regulations relating to the processing of personal data and privacy, including the Data Protection Act 1998-2018 (as may be amended or supplemented from time to time) and from 25 May 2018, the EU’s General Data Protection Regulation 2016/679 (the “GDPR”) (together the “Data Protection Legislation”).

Under Article 24(1) of the GDPR, the Company as a data controller, should implement an appropriate data protection policy as part of the organisational and technical measures it puts in place to demonstrate compliance with the GDPR.

This Policy describes how personal data must be collected, handled, stored, disclosed and otherwise “processed” to meet the Company’s data protection standards and to comply with the Data Protection Legislation.

The Company is responsible for and shall be in position to demonstrate compliance with this Policy. This includes ensuring that Fund Service Providers (as defined below) who process personal data on its behalf are acting in accordance with Data Protection Legislation.

1. The Regulations:

‘Regulation (EU) No. 2016/679 replaces Directive 95/46/EC (General Data Protection Regulation)’

Some key provisions of the Regulations are as follows:

Breaches – breaches of the regulations must be reported to the Data Protection Commissioner within 72 hours.. Also, the Regulations give rise potential fines for breaches of the Regulations up to a total of €20m (or 4% of total annual global turnover, whichever is greater).

Data Controller - Natural or legal person which determines the purposes and means of the Processing of Personal Data.

Data Processor - Natural or legal person which Processes Personal Data on behalf of the Data Controller.

Data Subject consent – clear, unambiguous, specific and freely given indication of the data subject’s agreement to the processing of personal data relating to them. The provision of consent must also be easily evidenced by the data controller.

Data Subject Rights – their right to access information held, data portability, right to be forgotten i.e. withdrawal of consent for which the data controller must provide information on action taken to comply with that request.

Personal Data – any information relating to an identifiable natural person (“data subject”) who can be identified from that data.

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Processing - Any operation which is performed on Personal Data including but not limited to collecting, storing, using, recording, disclosing, transferring or deleting personal data.

Timelines – Data controllers must comply with requests from data subjects within a shorter timeframe (no undue delay and must be concluded within one month)

2. Compliance:

The Company operates a model where the majority of services are delegated to Service Providers who confirm their own compliance with GDPR. Each Service Provider has been classified as either a Data Controller or a Data Processor. A Data Controller determines the purpose and means of data processing, while a Data Processor simply processes the personal data on behalf of the Company. The appointed service providers (each a “Fund Service Provider”) are:

Role	Service Provider	Data Processor/Controller
Administrator to underlying ICAV	Caceis Ireland Limited	Data Processor & Data Controller
Depositary to underlying ICAV	Caceis Bank, Ireland Branch	Data Controller
Investment Managers	As listed in the underlying Fund’s Prospectus	Data Controller
MLRO	Delphine Godo – Butler Corum	Data Processor
Company Secretary	Maples FS	Data Processor
Legal Advisor	Maples	Data Processor
Cloud based provider	Ecritel SA	Data Processor
3 rd party legal services/background checks	Maples & Calder	Data Processor

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Manager	CORUM Butler Asset Management Limited	Asset	Data Controller
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The Company is the Data Controller and as Data Controller, the Company must ensure the following with respect to personal data:

- It is processed lawfully, fairly and transparently
- It is only collected for specific and legitimate purposes
- It must be adequate, relevant and limited the minimum data necessary for the purpose for which it is collected
- It is only kept for such period as is necessary e.g. at least 6 years following the cessation of relationship with that data subject
- It must be processed with due care and be protected against any unlawful use, accidental loss or damage

The Company may also transfer personal data to a Fund Service Provider which such Fund Service Provider may process on its own behalf in the capacity of a data controller provided that it has a lawful basis for that processing. In such circumstances, the Company will seek assurances from the relevant Fund Service Provider that it is processing the relevant personal data for its legitimate interests or in order to comply with a legal obligation to which it is subject.

3. Audit:

The Company has undertaken an audit of personal data held by it or on its behalf by one of the appointed Fund Service Providers. The Audit addressed the following:

- What personal data is held
- For what purpose is the data held and is it lawful under GDPR
- Where that data is held
- Whether data is transferred, if so, to whom and if it is transferred to entities outside the EEA*
- How long data is held for

Where data is transferred outside the EEA, measures are taken to ensure equivalent safeguards are in place.

4. Data Subject Communication/Data Privacy Notice:

The data subjects within the Company i.e. CORUM Butler Asset Management Limited employees and Directors, have been notified of the GDPR impact to their data held by the Company and their rights in that regard, including the legal

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basis for the processing of their data, their rights under GDPR e.g. right to complain or to withdraw their consent and the time frame in which their data will be retained.

For new investors to the underlying ICAV's, this information is included in, but not limited to an updated subscription document. Existing investors who will not necessarily have sight of the updated subscription document and prospectus have been sent a Data Privacy Notice on behalf of the underlying ICAV's advising them of the new information relevant to the Regulations.

5. Service Provider Agreements:

As noted above, the Company operates on a delegated model under which the Fund Service Providers are appointed to provide certain services to the Company.

Agreements currently in place between the Company and the Fund Service Providers reflect the provisions of GDPR where necessary.

When contracting with a third party data processor, the Company shall conduct appropriate due diligence both at the outset of the relationship and on a periodic basis. The annual due diligence requirement will be scheduled as an event in the annual Compliance Calendar of the Board of the Company. The due diligence shall seek to ensure that the third party data processor is capable of complying with the requirements of the written agreement as detailed below under "Article 28(3) Data Processing Agreements". In particular, the Company shall obtain sufficient guarantees that the relevant Fund Service Provider will implement appropriate technical and organisational measures to ensure that the processing conducted by such Fund Service Provider will meet the requirements of the GDPR.

Each Service Provider shall provide a presentation on their GDPR processes to the Company on at least an annual basis. This presentation shall be scheduled as an event in the annual Compliance Calendar of the Board of the Company. The Company shall receive ongoing written confirmations of compliance with the Regulations at each quarterly Board meeting. The Company's Escalation procedures have been updated to allow for the notification of requests from data subjects to the various Fund Service Providers to be reported to the Board.

6. Breaches:

The Company's Fund service providers have in place procedures to identify breaches of data protection and, where such breach occurs in connection with personal data which they process on behalf of the Company, will notify the Company of any such breaches without undue delay. The Company will ensure all data breaches in relation to personal data of investors or Fund Service Providers and their affiliates (or their respective employees, partners, officers, agents and service providers), for which the Company is a Data Controller, will be notified to the Data Protection Commissioner within 72 hours of that breach being identified. The Company will appoint a contact (Data Protection Coordinator) for all relevant correspondence with the Office of the Data Protection Commissioner. Contact details for the Data Protection Coordinator are noted in Section 8 below.

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7. **Escalation:**

Any Service Provider of the underlying Funds or third parties providing services to the Company, who become aware of a Data breach in connection with Personal Data which they process on behalf of the Company and/or Fund shall without undue delay log the issue on “JIRA” (see Appendix 1 for detail) and inform the Company’s Data Protection Coordinator, (Savina Vernhettes), who will then inform the Board. The Data Protection Coordinator, who will co-ordinate notification to the Data Protection Commissioner, shall gather all relevant information concerning the breach.

Any Service Provider who receives a data request from a data subject in relation to personal data which they process on behalf of the Company will notify the Data Protection Coordinator immediately. The Data Protection Coordinator shall then immediately inform the Board and will ensure that such requests from a data subject requesting information on data held are appropriately responded to within 1 month of receipt of that request.

Data Protection Co-Ordinator: Savina Vernhettes

Email: savina.vernhettes@corum-am.com

Phone: +336 38 23 75 27

8. **Compliance with Regulation**

This Policy will be reviewed at least annually by the Board to ensure appropriateness. Additional updates and ad hoc reviews may be performed as and when required to ensure that any changes to the Company’s organizational structures/business practices/ Service Providers are properly reflected in the Policy.

All changes made will be communicated to and confirmed by the Board.

The Board of Directors of the Company has ultimate responsibility for ensuring that the Company complies with its obligations under Data Protection Legislation.

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Appendix 1 - Internal Incidents Reporting process

How to report internally?

➤ **Log into Jira**

From the website : <https://corumam.atlassian.net>

From your cell phone app : JIRA Cloud by Atlassian

Prerequisite : Activate your JIRA account through a mail that you received from Atlassian

➤ **Follow the steps described in the attached user guide**



JIRA_Incidents_User
Guide_2020_VF.pdf

The following information must be reported:

- incident report number,
- date of incident,
- name of the reporter, i.e. the person who discovered the incident,
- Group entity (choose CBAM), department, vehicle or person concerned,
- nature of the incident,
- potential impacts (financial for instance),
- reference procedure,
- detailed description of the incident,
- resolution and corrective measures which were implemented,
- incident status (open, ongoing, closed),
- date of resolution.

The employee shall write a detailed description of the incident and can assign it to someone. The employee may attach any document that could lead to a better understanding of the incident.

Incidents shall be handled as expeditiously as possible and monitored by their reporters.

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