

KARAKTER INVEST SICAV-FIS S.A.

Société d'investissement à capital variable – fonds d'investissement spécialisé

2, rue d'Alsace - L-1122 LUXEMBOURG

R.C.S. Luxembourg B 172 603

Karakter Invest SICAV-FIS S.A. (the "Fund"), is organised as a *société d'investissement à capital variable* in the Grand Duchy of Luxembourg. It is organised as a *société anonyme* under the amended Law of 10th August 1915 on commercial companies (the "**1915 Law**") and qualifies as an undertaking for collective investment in transferable securities under Part I of the 2010 Law. The Fund is registered under number B172603 at the *Registre de Commerce et des Sociétés* of Luxembourg and its principal and registered office is at 2, rue d'Alsace L-1122 Luxembourg.

About this privacy notice

The Fund is a data controller in respect of your personal data for the purposes of data protection law, such as the European Union's General Data Protection Regulation ("**GDPR**"). The Fund is responsible for ensuring that it uses your personal data in compliance with data protection law.

Quintet Private Bank (Europe) S.A. ("**Quintet**", the Fund's Depositary Bank and Paying Agent), the Board of Directors of the Fund, UI efa S.A. ("**EFA**", the Fund's Administrative, Domiciliary, Registrar and Transfer Agent) (together the "**Entities**"), will generally process personal data provided to them in connection with an investment in the Fund in accordance with the Fund's instructions, and the Fund will generally act as the data controller of any such personal data.

This privacy notice applies to you if (i) you are an applicant for shares in the Fund, (ii) your personal data has been provided to the Fund in connection with an application for shares in the Fund by another person (such as where you are a director, partner, trustee, employee, agent or direct or indirect owner of an applicant) or (iii) the Fund otherwise uses your personal data. This privacy notice sets out the basis on which personal data about you will be processed by the Fund. Please take the time to read and understand this privacy notice.

Personal data that the Fund might use

The Fund might process the following personal data about you:

- (a) Information provided to the Fund by you or (if different) the applicant: This might include 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. Such information might be provided in an application form or in other documents (as part of an application process or at other times), face-to-face, by telephone, by email or otherwise.
- (b) Information that the Fund collects or generates: This might include information relating to your (or an applicant's) investment in the Fund, emails (and related data), call recordings and website usage data.
- (c) Information that the Fund obtains from other sources: This might include information obtained for the purpose of the Fund's know-your-client procedures (which include anti-money laundering procedures, counter-terrorist financing procedures, politically-exposed-person checks, sanctions checks, among other things), information from public websites and other public sources and information received from the applicant's advisers or from intermediaries.

Uses of your personal data

Your personal data may be stored and processed by the Fund for the following purposes:

- (a) Assessing and processing applications for shares in the Fund and other share dealings, including performing know-your-client procedures, issuing and redeeming shares, receiving payments from and making payments to the applicant, calculating net asset value, and overseeing these processes.

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(b) General business administration, including communicating with investors, communicating with service providers and counterparties, accountancy and audit services, risk monitoring, the administration of IT systems and monitoring and improving products.

(c) Compliance with legal and regulatory obligations and industry standards, including know-your-client procedures, the automatic exchange of tax information and legal judgments.

(d) In respect of information shared with the Fund's Board of Directors, their business activities relating to the Fund, such as investor relations, discussions with the Fund's service providers and counterparties, decision-making in relation to the Fund, and business strategy, development and marketing.

The Fund is entitled to process your personal data in these ways for the following reasons:

- a) If you are the applicant, you may enter into an investment contract with the Fund and some processing will be necessary for the performance of that contract, or will be done at your request prior to entering into that contract.
- b) Processing may be necessary to discharge a relevant legal or regulatory obligation.
- c) The processing will, in all cases, be necessary for the legitimate business interests of the Entities or another person, such as:
 - (i) carrying out the ordinary or reasonable business activities of the Entities or other persons, or other activities previously disclosed to the Fund's investors or referred to in this privacy notice;
 - (ii) ensuring compliance with all legal and regulatory obligations and industry standards, and preventing fraud;
 - (iii) establishing, exercising or defending legal rights or for other purposes relating to legal proceedings; and
 - (iv) ensuring the security of information systems.
- d) In respect of any processing of sensitive personal data falling within special categories, such as any personal data relating to the political opinions of a politically exposed person, the processing will be necessary for reasons of substantial public interest.

Disclosure of your personal data to third parties

The Fund may from time to time, in accordance with the purposes described above, disclose your personal data to the Entities, including their affiliates and to (a) professional advisers such as law firms and accountancy firms, (b) other service providers of the Entities, including technology service providers, (c) counterparties and (d) courts and regulatory, tax and governmental authorities. Some of these persons will process your personal data in accordance with the Fund's instructions and others will themselves be responsible for their use of your personal data. These persons may be permitted to further disclose the personal data to other parties.

Transfers of your personal data outside the European Economic Area

Your personal data may be transferred to and stored by persons outside the European Economic Area (the "EEA"), and in particular may be transferred to and stored by affiliates or service providers of the Fund or the Fund's administrator outside the EEA.

Where personal data is transferred outside the EEA, the Fund will ensure that the transfer is subject to appropriate safeguards or is otherwise permitted under applicable law. For example, the country to which the personal data is transferred may be approved by the European Commission, the recipient may have agreed to model contractual clauses approved by the European Commission that oblige them

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to protect the personal data, or the recipient may be located in the United States and be a certified member of the EU-US Privacy Shield scheme.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA, including a copy of any standard data protection clauses entered into with recipients of your personal data, by contacting the Fund using the details set out under “Contacting the Fund” below.

Necessity of personal data for an investment in the Fund

The provision of certain personal data is necessary for shares in the Fund to be issued to any applicant and for compliance by the Fund and its service providers with certain legal and regulatory obligations. Accordingly, if certain personal data is not provided when requested, an application for shares might not be accepted or shares might be compulsorily redeemed.

Retention of personal data

How long the Fund holds your personal data for will vary. The retention period will be determined by various criteria, including the purposes for which the Fund is using it (as it will need to be kept for as long as is necessary for any of those purposes) and legal obligations (as laws or regulations may set a minimum period for which the Fund has to keep your personal data).

Your rights

You have a number of legal rights in relation to the personal data that the Fund holds about you. These rights include the following:

- (a) The right to obtain information regarding the processing of your personal data and access to the personal data that the Fund holds about you.
- (b) In some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and to request that the Fund transmits that data to a third party where this is technically feasible. Please note that this right to data portability only applies to personal data which you have provided to the Fund.
- (c) The right to request that the Fund rectifies your personal data if it is inaccurate or incomplete.
- (d) The right to request that the Fund erases your personal data in certain circumstances. Please note that there may be circumstances where you ask the Fund to erase your personal data but the Fund is legally entitled to retain it.
- (e) The right to object to, and the right to request that the Fund restricts, its processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask the Fund to restrict, its processing of your personal data but the Fund is legally entitled to continue processing your personal data or to refuse that request.
- (f) The right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by the Fund.

You can exercise your rights by contacting the Fund using the details set out under “Contacting the Fund” below. You can find out more information about your rights by contacting an EU data regulator such as the National Commission for Data Protection (*Commission Nationale pour la Protection des Données* - “CNPD”) in Luxembourg, or by searching their website at <https://cnpd.public.lu>.

Cookies

The Fund uses some types of cookies in order to provide the best online experience during the visit to the website.

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(a) What are cookies?

Cookies are small text files sent by a web server to the user's browser, stored on his computer and re-sent to the web site during subsequent access sessions. To ensure to get the best possible experience when visiting the website, the Fund recommends to configure the browser to accept the receipt of cookies.

Cookies are used to help us improve user's experience when using the website and in order to carry out statistical analyses of how users use the website, such as how many pages a user has visited or the number of mouse clicks made on a page. Cookies adopted in this site do not allow the acquisition of personal identification of users / visitors.

(b) Type of cookie and function

Session Cookie - it is stored only in a volatile form on user's device and it is not permanently stored on hard-disks. This implies that it is deleted when browser is exited. It is only used to transmit session identifiers, that are random numbers generated by web server, necessary to permit a safe and effective web browsing.

In order to carry out statistical analyses of how users access the website, the Fund uses the following tools that utilize cookie: Google Analytics.

They set up cookies to allow to collect anonymous information about the pages visited by a user to improve navigation in the future and to determine the source of possible error messages. For example, they collect information about the IP address, the pages visited, number of visits, browser used but do not collect information that can identify the user personally.

With any addition of content the Fund keeps the user updated on the information selected with care that the user can find relevant or of its interest, but this may lead to third-party providers memorize additional cookies on the user's device. If the user follow a link to such third-party sites, please consult their privacy policies about cookies because they are not managed by the Fund.

For cookies used by Analytics see the policy at this link <http://www.google.it/intl/en/policies/privacy/>

(c) How can the user manage cookies?

To ensure to get the best possible experience when visiting the websites, we recommend to accept cookies. Most Internet browsers are initially set to accept cookies. The user can, at any time, set the browser to accept all cookies, only some, or to reject them, disabling the use. In addition, the user can set the browser preferences in order to be notified each time a cookie is stored on the device. Please note that disabling cookies this website could not work properly.

Contacting the Fund

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed above, please address questions and requests to Joost Olbrechts (joost.olbrechts1@telenet.be).