

MFS United Kingdom, EEA and Switzerland Privacy Policy

February 2021

MFS appreciates the opportunity to help you meet your financial needs. We are committed to safeguarding the privacy and confidentiality of the Personal Information you have entrusted to us. This Privacy Policy applies where MFS International (UK) Limited and MFS Investment Management Company (Lux) S.à r.l. (also referred to in this policy as "MFS", "we", "us", "our") are acting as a data controller with respect to your information and outlines our commitment to you. This policy sets out the basis on which your information is collected, stored and used by us.

Depending on the nature of your relationship with MFS, you may receive further notices highlighting certain uses we wish to make of your Personal Information together with the ability to opt in or out of selected uses.

Our websites may contain links to other third party websites. If you follow a link to any of those third party websites, please note that they have their own privacy policies and we do not accept any responsibility or liability for their policies or processing of your Personal Information. Please check these policies before you submit any Personal Information to such third party websites.

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1. Accountability

We have strict policies and procedures governing how we deal with your Personal Information. Each and every one of our employees is responsible for respecting and protecting the Personal Information to which they have access.

Our compliance team oversees privacy governance including policy, education, communications activities, handling of questions or complaints, and internal reporting on privacy matters. If you have any questions or concerns regarding our Privacy policy, or how we process your information, please contact us via e-mail at MFSPrivacyOffice@mfs.com or by postal service at one of the addresses listed here: [Contact Us](#).

2. Personal Information that we collect

Depending on the product or service that we provide to you, we may collect and process Personal Information about you, including:

- **Information you provide to us** ► information that you provide to us (including your name, email address, other contact details, and the entity with which you are affiliated, if applicable), such as when you use the contact form on our website, provide a business card to an MFS employee, or interact with MFS in a business relationship or potential business relationship;
- **Information about you provided to us by others** ► information about you (including your name and business contact information) that is made available to us by others, such as when you are identified as a contact person by an entity with which we do business, or when we obtain details about you from a resource such as LinkedIn, your company's website, or a business intelligence resource;
- **Anti-Crime and Fraud Information** ► information relating to any criminal or fraudulent activities or suspicious transactions provided to us by you or third parties, including information which establishes your identity (such as driving licences and passports); and politically exposed person and sanctions lists where your details may be included;
- **Financial Information** ► information provided to us by you or a third party (such as your broker or financial advisor or the transfer agent for a fund you are invested in) to enable us to provide services to you, to enter into a business relationship with you or an entity with which you are affiliated, or to satisfy legal or regulatory requirements;
- **Your transactions and holdings** ► details of transactions or holdings in MFS-managed financial products that you have made or initiated;

- **Our correspondence** ► if you contact us, we will typically keep a record of that correspondence;
 - **Device Information** ► such as information about your operating system, browser, software applications, IP address, geolocation, security status and other device information in order to improve your experience, protect against fraud, and manage risk;
 - **Website and communication usage** ► details of your visits to the websites and information collected through cookies, entry links, and other tracking technologies including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs, entry links, and other communication data, and the resources that you access;
 - **Marketing preference information** ► details of your marketing preferences (e.g. communication preferences) and information relevant to selecting appropriate products and services to offer you;
 - **Email tracking information** ► Our emails may contain a single, campaign-unique “web beacon pixel” to tell us whether our emails are opened and combined with other technology to verify any clicks through to links within the email. We may use this information for purposes including determining which of our emails are more interesting to you and to query whether users who do not open our emails wish to continue receiving them. The pixel will be deleted when you delete the email. If you do not wish the pixel to be downloaded to your device, you should select to receive emails from us in plain text rather than HTML, choose not to click links that we send you or unsubscribe from the receipt of our emails;
 - **Call recordings and CCTV** ► We may monitor or record incoming or outgoing telephone calls of our Investment Personnel in order to comply with regulatory requirements. We may record CCTV footage in and around our premises for the safety of our clients and employees, and to protect against theft, property damage and fraud;
 - **Survey information** ► we may also ask you to complete surveys that we use for research purposes. In such circumstances we shall collect the information provided in the completed survey.
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3. Purposes for which we use your Personal Information

We will process your Personal Information only to the extent applicable law provides a legal basis for us to do so. Specifically, we will process your Personal Information only if:

1. You have consented to our use of your information;
2. Your information is necessary for us to enter into or perform our contract with you;
3. We need your information to comply with our legal or regulatory obligations;
4. Your information is necessary for us to defend, prosecute, or make a claim against you, us, or a third party; or
5. Your information allows us to achieve a legitimate interest which is not overridden by your interests or your fundamental rights or freedoms. Our legitimate interests will be ensuring that we provide relevant, high quality, and appropriate services related to investment management; prevention of crime and fraud; cooperation with law enforcement and regulatory authorities; direct marketing; improving our website functionality; and allowing us to make changes to the services we offer.

When we collect your Personal Information, we may use or disclose it for the following purposes:

- **To provide and manage products and services to you or an entity with which you are affiliated** ► to administer our services, including to carry out our obligations arising from any agreements entered into between you and us, or to notify you about changes to our services and products.
- **To verify your identity, protect against fraud, and manage risk** ► we and other organisations may access and use certain information to prevent fraud, money laundering, and terrorism, as may be required by applicable law and regulation and best practice at any given time, including checking against sanctions lists, politically exposed persons (PEP) lists, and other fraud or crime screening databases. If false or inaccurate information is provided and fraud is identified or suspected, details may be passed to fraud prevention agencies and may be recorded by us or by them.
- **To comply with legal or regulatory requirements, or as otherwise permitted by law** ► we may process your Personal Information to comply with our regulatory requirements, dialogue with our regulators or defend or prosecute claims as applicable which may include disclosing your Personal Information to third parties, the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings, or investigations by such parties anywhere in the world. Where permitted, we will direct any such request to you or notify you before responding unless to do so would prejudice the prevention or detection of a crime.
- **To monitor certain activities** ► to monitor queries and transactions to ensure service quality, compliance with procedures, and to combat fraud;

- **To inform you of changes** ► to notify you about changes to our services and products;
- **To communicate with you regarding products and services that may be of interest** ► to provide you with updates and information. We may also use your information for marketing our products and services to you by post, email, phone, online or social media advertisement. Where required by law, we will ask for your consent at the time we collect your data to conduct any of these types of marketing. We will provide an option to unsubscribe or opt-out of further communication on any electronic marketing communication sent to you or you may opt out by visiting [Contact Us](#).
- **To understand our customers and to develop and tailor our products and services** ► we may analyse the Personal Information we hold in order to better understand our clients' services and marketing requirements, to better understand our business, and develop our products and services. In order to ensure that content from our website is presented in the most effective manner for you and for your device, we may pass your data to business partners, suppliers and/or service providers;
- **To reorganise or make changes to our business** ► in the event that we (i) are subject to negotiations for the sale of our business or part thereof to a third party, (ii) are sold to a third party or (iii) undergo a reorganisation, we may need to transfer some or all of your Personal Information to the relevant third party (or its advisors) as part of any due diligence process for the purpose of analysing any proposed sale or reorganisation. We may also need to transfer your Personal Information to that reorganised entity or third party after the sale or reorganisation for them to use for the same purposes as set out in this policy;
- **To communicate effectively with you in the course of business** ► to conduct our business, including to respond to your queries, to otherwise communicate with you, or to carry out our obligations arising from any agreements entered into between you and us.

4. Sharing your Personal Information (including transfers)

We will only use or disclose your Personal Information for the purpose(s) it was collected and as otherwise identified in this Privacy Policy.

Sharing outside MFS entities: Personal Information may be provided to third parties, including anti-fraud organisations, legal, regulatory or law enforcement authorities in cases of suspected criminal activity or contravention of law, for the detection and prevention of fraud, or when required to satisfy the legal or regulatory requirements of governments, regulatory authorities or other self-regulatory organizations, or to comply with a court order.

Sharing within MFS entities: We may share your Personal Information among MFS entities, including locations outside of the European Economic Area where we do business, for marketing purposes, for legal and regulatory purposes, to manage risks, to perform analytics, to ensure we have correct or up to

date information about you (such as your current address or date of birth) and to better manage your relationship with us.

Business sale or reorganisation: Over time, we may buy new businesses or sell some of our businesses. Accordingly, Personal Information associated with any accounts, products or services of the business being purchased or sold will be reviewed as part of the due diligence process and subsequently transferred as a business asset to the new business owner. We may also transfer Personal Information as part of a corporate reorganisation or other change in corporate control.

Sub-contractors and agents: We may use affiliates or other companies to provide services on our behalf such as data processing, account administration, fraud prevention and detection, analytics and marketing. Such companies will be given only the Personal Information needed to perform those services and we do not authorize them to use or disclose Personal Information for their own marketing or other purposes. We have contracts in place holding these companies to the same standards of confidentiality by which we are governed.

Transfers outside of the United Kingdom or the EEA: Your Personal Information may be accessed by staff, suppliers or other persons in, transferred to, and/or stored at, a destination outside the United Kingdom or the European Economic Area (EEA) in which data protection laws may be of a lower standard than in the EEA. We will, in all circumstances, safeguard personal information as set out in this Privacy Policy.

Where we transfer personal information from inside the United Kingdom or the European Economic Area (the **EEA**) to outside the United Kingdom or EEA, we take specific additional measures to safeguard the relevant personal information. This may be handled in one of the following ways:

- The countries that we send information to have been approved by the European Commission as providing adequate level of protection for information and therefore no additional safeguards are required to export personal information to these jurisdictions.
- We will establish legal grounds justifying such transfer, such as EU Commission-approved model contractual clauses, or other legal grounds permitted by applicable legal requirements.

Please [Contact Us](#) if you would like more information on the protection given to your information when it is transferred outside the United Kingdom or the EEA.

5. Retention of your Personal Information

Our retention periods for personal data are based on business needs and legal requirements. We retain your Personal Information for as long as is necessary for the processing purpose(s) for which the information was collected, and any other permissible, related purpose. For example, we may retain certain transaction details and correspondence until the time limit for claims arising from the transaction has expired, or to comply with regulatory requirements regarding the retention of such data. When Personal Information is no longer needed, we either irreversibly anonymise the data (and we may further retain and use the anonymised information) or securely destroy the data.

6. Maintaining the accuracy of your Personal Information

We are committed to maintaining the accuracy of your Personal Information and ensuring that it is complete and up-to-date. If you discover inaccuracies in our records, or your Personal Information changes, please notify us immediately so that we can make the necessary changes. Failure to notify us of changes to your Personal Information may negatively impact the way we communicate or provide services to you. Where appropriate, we will advise others of any material amendments to your Personal Information that we may have released to them. If we do not agree to make the amendments that you request, you may challenge our decision as described in [Contact Us](#).

7. Safeguarding your Personal Information

We use physical, electronic, and procedural safeguards to protect against unauthorized use, access, modification, destruction, disclosure, loss or theft of your Personal Information in our custody or control.

We have agreements and controls in place with third party service providers requiring that any information we provide to them must be safeguarded and used only for the purpose of providing the service we have requested the company to perform.

Security over the internet

No data transmission over the Internet or website can be guaranteed to be secure from intrusion. However, we maintain commercially reasonable physical, electronic, and procedural safeguards to protect your personal information in accordance with data protection legislative requirements.

All information you provide to us is stored on our secure servers or our subcontractors' secure servers and accessed and used subject to our security policies and standards. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share a password with anyone.

8. Changes to this Privacy Policy

From time to time, we may make changes to this Privacy Policy.

Please [Contact Us](#) to answer any questions you may have about our Privacy Policy.

9. Your Rights

Under certain conditions (in particular where MFS has directed the use of your Personal Information from one of its European branch offices), you may have the right to:

- **request details** relating to the processing of your information;
- **request access** to the personal information we have about you;
- **update any inaccuracies** in the personal information we hold (please see Section 6);
- **delete** any personal information that we no longer have a lawful ground to use;
- where processing is based on consent, to **withdraw your consent** so that we stop that particular processing (such as marketing);
- **object to any processing** based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights; and
- request to **restrict processing** of your information, which will be honored unless certain legal exceptions apply.

Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege). If you exercise any of these rights, we will check your entitlement and respond in most cases within a month.

If you have any questions in relation to our use of your Personal Information, you should first contact us as per the [Contact Us](#) section below. If you are not satisfied with our use of your personal information or our response to any exercise of these rights you have the right to **lodge a complaint** with a relevant data protection regulator (listed below).

Contact Us

If you have any questions or concerns about our privacy practices, the privacy of your Personal Information or you want to change your privacy preferences, please let us know.

To manage your email preferences, please get in touch with us using the details below:

MFS International (UK) Limited

Attn: Compliance Officer
One Carter Lane
London EC4V 5ER
MFSPrivacyOffice@mfs.com

MFS Investment Management Company (Lux) S.à r.l

Attn: Compliance Officer
35 Boulevard Prince Henri
Luxembourg City L-1724
MFSPrivacyOffice@mfs.com

Data Protection Regulators

<p><u>UK</u> The Information Commissioner's Office Call: +44 1625 545 745 Visit: https://ico.org.uk/</p>	<p><u>Luxembourg</u> Commission Nationale pour la Protection des Données Call: +352 2610 60 1 Visit: http://www.cnpd.lu</p>
<p><u>France</u> Commission Nationale de l'Informatique et des Libertés Call: +33 (0)1 53 73 22 22 Visit: https://www.cnil.fr/fr</p>	<p><u>Germany</u> Der Hessische Beauftragte für Datenschutz und Informationsfreiheit Call: +49 611 1408 - 0 Visit: https://datenschutz.hessen.de/</p>
<p><u>Italy</u> Garante per la Protezione dei Dati Personali Call: +39-06-6967 71 Visit: http://www.gpdp.it/</p>	<p><u>Netherlands</u> Autoriteit Persoonsgegevens Call: +31 070 888 85 00 Visit: https://autoriteitpersoonsgegevens.nl/nl</p>
<p><u>Spain</u> Agencia de Protección de Datos Call: +34 91399 6200 Visit: https://www.agpd.es/</p>	<p><u>Switzerland</u> Eidgenössischer Datenschutz- und Öffentlichkeitsbeauftragter (EDÖB) Call: +41 (0)58 462 43 95 Visit: https://edoeb.admin.ch</p>