

Effective Date: March 31, 2025

Last Reviewed: March 2025

MFS appreciates the opportunity to help you meet your financial needs. Privacy is a concern for every investor today. At MFS International (UK) Limited and MFS Investment Management Company (Lux) S.à.r.l. (together "**MFS**", "**we**", "**our**", "**us**") we take this concern very seriously. We are committed to safeguarding the privacy and confidentiality of your Personal Data you have entrusted to us. This Privacy Notice ("**Notice**") applies where MFS International (UK) Limited and MFS Investment Management Company (Lux) S.à r.l. (also referred to in this Notice 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.

For purposes of this Notice, Personal Data means information about an identifiable natural person. It includes information you have provided to us or was collected by us from other source. This Privacy Notice is designed to provide you with a summary of our collection, use, sharing, and processing of personal information, the business purposes for doing so and the rights you may have. It also outlines the measures we take to safeguard your personal information and how you can [Contact Us](#) about our privacy practices.

Important Note

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

If you own MFS products or receive MFS services in the name of a third party such as a bank or broker/dealer, their privacy policy may apply to you instead of ours. In addition, for certain MFS funds, information provided by you or your financial intermediary to the funds’ non-affiliated third-party service providers (e.g., the funds’ transfer agent) would be subject to the privacy policies of the service provider.

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1. What is covered by this Privacy Notice?

This MFS® Online Privacy Notice (“**Notice**”) applies to our privacy practices for the handling and processing of your Personal Data when you use the MFS.com website, when you interact with us by phone, email or in-person, or when you visit one of our offices. This Notice will also explain our purposes for using your Personal Data, how we protect it, and your rights you may have under applicable privacy and data protection laws, such as the European Union General Data Protection Regulation (“**GDPR**”) and the United Kingdom General Data Protection Regulation (“**UK GDPR**”).

This Notice applies where we are acting as a data controller, as defined by the GDPR and UK GDPR, with respect to your Personal Data and outlines our commitment to you.

For purposes of this Notice, Personal Data means information about an identifiable natural person. It includes information you have provided to us or was collected by us from other source.

This Notice **does not** apply to Personal Data relating to MFS employees, job applicants, and contractors in the context of employment.

2. What Personal Data do we collect?

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

- **Information you provide to us** ► information that you provide to us (including your name, email address, other contact details, username, password, and the entity with which you are affiliated, if applicable), such as when you use engage with the MFS.com website, call or email us, 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; and

- **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.

The Personal Data that you provide to us is voluntary; however, if you do not provide the Personal Data requested, we may not be able to provide our services or products to you.

3. How do we use your Personal Data?

We will process your Personal Data only to the extent applicable law provides a legal basis for us to do so. Specifically, we will process your Personal Data If one or more of the following applies:

1. You have consented to our use of your Personal Data;
2. Your Personal Data is necessary for us to enter into or perform our contract with you;
3. We need your Personal Data to comply with our legal or regulatory obligations;
4. Your Personal Data is necessary for us to defend, prosecute, or make a claim against you, us, or a third party; or
5. Your Personal Data allows us to achieve a legitimate interest which is not overridden by your interests or your fundamental rights or freedoms. Our legitimate interests may include 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.

4. What are our purposes for using your Personal Data?

When we collect your Personal Data, 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 Data to comply with our regulatory requirements, dialogue with our regulators or defend or prosecute claims as applicable which may include disclosing your Personal Data 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 events, products, and services that may be of interest** ► to provide you with updates and information. We may also use your information for marketing our events, 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 the [Contact Us](#) section below.
- **To understand our customers and to develop and tailor our products and services** ► we may analyse the Personal Data 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 Data 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 Data 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 Notice.
- **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.

5. Disclosing your Personal Data

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

Outside MFS entities: Personal Data 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.

Within MFS entities: We may share your Personal Data 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 Data 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 Data as part of a corporate reorganisation or other change in corporate control.

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 Data needed to perform those services and we do not authorize them to use or disclose Personal Data 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.

6. International Transfers

Your Personal Data may be accessed by staff, service providers, or other persons in, transferred to, and/or stored at, a destination outside the United Kingdom, the European Economic Area (“EEA”), or Switzerland in which data protection laws may be of a lower standard than in the United Kingdom, the EEA, or Switzerland. We will, in all circumstances, take specific measures to safeguard the relevant Personal Data, including ensuring that:

- The countries that we send Personal Data 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 Data to these jurisdictions.
- We will establish legal grounds justifying such transfer, such as the EU Commission’s 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 Personal Data when it is transferred outside the United Kingdom, the EEA, or Switzerland.

7. Links to Third-Party Websites

The MFS.com website may contain links to other third-party websites that are not affiliated with or maintained by MFS. MFS does not monitor the privacy practices of these third-party sites, does not exercise any authority over the websites and specifically, does not control the use of "cookies" on 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 Data. Please check these policies before you submit any Personal Data to such third-party websites.

8. No Sale of Personal Data

We will not sell your Personal Data to third parties, and we take measures to ensure that Personal Data is not disclosed to unauthorized third parties.

9. Retention of your Personal Data

Our retention periods for Personal Data are based on business needs and legal requirements. We retain your Personal Data 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 Data 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.

10. Maintaining the accuracy of your Personal Data

We are committed to maintaining the accuracy of your Personal Data and ensuring that it is complete and up to date. If you discover inaccuracies in our records, or your Personal Data changes, please notify us immediately so that we can make the necessary changes. Failure to notify us of changes to your Personal Data 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 Data that we may have released to them. If we do not agree to make the amendments that you request, you may challenge our decision to a Data Protection Regulator as described in the [Data Protection Regulators](#) section below.

11. Safeguarding your Personal Data

In our commitment to securing your Personal Data, we use physical, electronic, and procedural safeguards to protect against unauthorized use, access, modification, destruction, disclosure, loss or theft of your Personal Data in our custody or control.

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

a. Accountability

We have strict policies and procedures governing how we deal with your Personal Data. Each and every one of our employees is responsible for respecting and protecting the Personal Data 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 this Notice, or how we process your Personal Data, please see the [Contact Us](#) section below for information on how to reach us.

b. 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 Data in accordance with data protection legislative requirements.

All information you provide to us is stored on our secure servers or our contractors' 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 your password with anyone.

12. Privacy of Minors

The MFS.com website and MFS' business and marketing activities are not directed, or intended for use, by minors under the age of 16 years old or as defined by applicable laws or regulations.

13. Your Privacy Rights

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

- **request details** relating to the processing of your Personal Data;
- **request access** to the Personal Data we have about you;
- **update any inaccuracies** in the Personal Data we hold (please see Section 10);
- **delete** any Personal Data 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);
- **request the transmission** of your Personal Data in a portable format;
- **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 Personal Data, 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 Data or wish to exercise any of your rights, you should contact MFSPrivacyOffice@mfs.com. If you are not satisfied with our use of your Personal Data or our response to any exercise of these rights you have the right to **lodge a complaint** with a relevant [Data Protection Regulator](#) as listed below.

14. Cookies and Online Tracking

We use cookies and other online tracking technologies on the MFS.com website. Please see our [Cookies Policy](#) for more information.

15. Updates to this Privacy Notice

MFS may change this Notice at any time. Any updates to this Notice will be posted here and effective immediately upon posting. If we make any material changes to this Notice, we will post the revised Notice with an updated “Effective Date”.

Please Contact Us to answer any questions you may have about this Notice.

16. Contact Us

If you have any questions or concerns about our privacy practices, the privacy of your Personal Data or you want to change your privacy 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

17. Data Protection Regulators

If you have any concerns about our use of your Personal Data, you may make a complaint by contacting the data protection regulator in the country where you are located or where the MFS branch with which your deal is established:

| <u>UK</u> | <u>Luxembourg</u> |
|---|---|
| The Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF | Commission Nationale pour la Protection des Données 15, Boulevard du Jazz L-4370 Belvaux Call: +352 2610 60 1 Visit: http://www.cnpd.lu |

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| Call: +44 0303 123 1113 Visit: https://www.ico.org.uk/ | |
| <u>France</u> Commission Nationale de l'Informatique et des Libertés 3 Place de Fontenoy TSA 80715 – 75334 Paris, Cedex 07 Call: +33 (0)1 53 73 22 22 Visit: https://www.cnil.fr/fr | <u>Germany</u> Der Hessische Beauftragte für Datenschutz und Informationsfreiheit Postfach 3163 65021 Wiesbaden Call: +49 611 1408 - 0 Visit: https://datenschutz.hessen.de/ |
| <u>Italy</u> Garante per la Protezione dei Dati Personali Piazza Venezia, 11 00187 Roma Call: +39 06 696771 Visit: https://www.garanteprivacy.it | <u>Netherlands</u> Autoriteit Persoonsgegevens Hoge Nieuwstraat 8 Postbus 93374 2509 AJ Den Haag Call: +31 070-8888 500 Visit: https://autoriteitpersoonsgegevens.nl |
| <u>Spain</u> Agencia Española de Protección de Datos C/Jorge Juan, 6 28001 Madrid Call: +34 900 293 183 Visit: https://www.aepd.es/ | <u>Switzerland</u> Eidgenössischer Datenschutz- und Öffentlichkeitsbeauftragter (EDÖB) Feldeggweg 1 CH - 3003 Berne Switzerland Call: +41 (0)58 462 43 95 Visit: https://edoeb.admin.ch |