

Hermes Alternative Funds PLC

Privacy Statement – for registered shareholders and applicants for shares

This notice sets out how Hermes Alternative Funds PLC (the “Fund”) will process your Personal Data, why the Fund uses it (as a controller) and how you may contact the Fund in relation to the use of your Personal Data.

Personal Data means any information which the Fund has or obtains, or which you provide to the Fund or its service providers, such as your name, address, email address, date of birth etc., from which you can be directly or indirectly personally identified, and may include information such as identification and account numbers, tax identifiers and residency information, and online identifiers.

The Fund will collect and process Personal Data of natural persons who are registered shareholders, applicants for shares, beneficial owners of registered shareholders and applicants for shares, personal representatives, financial advisors, directors, officers, employees, agents, trustees and / or authorised signatories of registered shareholders and applicants for shares (“**Individuals**”) and other information relating to the dealings of Individuals with the Fund and / or its service providers.

The Fund, acting as a controller may itself (or through a third party such as Northern Trust International Fund Administration Services (Ireland) Limited (the “**Administrator**”) acting in its capacity as the Fund’s administrator) process your Personal Data or that of your directors, officers, employees and/or beneficial owners. When processing your Personal Data, there may also be times where Hermes Investment Management Limited, the Fund’s investment manager (the “**Investment Manager**”), will act as a controller of your Personal Data, as set out in the section **Investment Manager as a Controller**.

Where the Fund needs to process Personal Data in connection with a registered shareholder’s contract with the Fund or in anticipation of an applicant for shares becoming a registered shareholder, or where the Fund has a legal obligation to collect certain Personal Data relating to an Individual (for example, in order to comply with AML obligations), the Fund will not be able to deal with the registered shareholder or applicant for shares if the Individual does not provide the necessary Personal Data and other information required by the Fund.

In connection with this, please note the following:

Use of Personal Data and Basis of Processing

The Fund will process Personal Data:

1. for the purposes of performing the contract with a registered shareholder (either directly or acting on behalf of an institution) or in anticipation of an applicant for shares becoming a registered shareholder, namely:
 - (a) for the purposes of providing services to the registered shareholder, and setting up and administering the applicant’s or registered shareholder’s account(s), as the case may be;
 - (b) for the collection of subscriptions and payment of redemptions, distributions and dividends;
 - (c) to deal with queries or complaints from registered shareholders;
2. for compliance with the Fund’s legal obligations, including:

- (a) anti-money laundering and anti-terrorist financing (collectively “AML”) and fraud prevention purposes, including OFAC and PEP screening for these purposes and to comply with UN, EU and other applicable sanctions regimes;
 - (b) compliance with applicable tax and regulatory reporting obligations;
 - (c) where the Fund is ordered to disclose information by a court with appropriate jurisdiction;
 - (d) recording of telephone calls and electronic communications in order to comply with applicable law and regulatory obligations;
3. where use is for a legitimate purpose of the Fund, including:
- (a) for day-to-day operational and business purposes;
 - (b) to take advice from the Fund’s external legal and other advisors;
 - (c) board reporting and management purposes, including quality assurance;
 - (d) in the event of a merger or proposed merger of the Fund or any sub-fund of the Fund;
4. where use or sharing is for a legitimate purpose of another company in the Hermes Group, or of a third party to which the Fund provides the Personal Data, including:
- (a) for day-to-day operational and business purposes;
 - (b) to retain AML and other records of Individuals to assist with the subsequent screening of them by the Administrator including in relation to other funds or clients of the Administrator;
 - (c) investor relationship management;
 - (d) calculation and payment by the recipient of commissions and rebates; and,
5. where necessary to establish, exercise or defend its legal rights or for the purpose of legal proceedings.

The Fund will not disclose any Personal Data to any third party, except as outlined above and / or as follows:

1. to its service providers, including the Administrator (Northern Trust, <https://www.northerntrust.com/emea-privacy-notice>) and Investment Manager (Hermes Investment Management, <https://www.hermes-investment.com/ukw/privacy-policy-and-cookies/>), and their affiliates, and other third-party service providers engaged by the Fund in order to process the data for the above mentioned purposes and on the understanding that they will keep the Personal Data confidential. These include:
- i. The Northern Trust Company in the USA for the purposes of IT Service Support, Data Storage and System Access Management and Maintenance; Email Retention and Archiving; Call recording and Monitoring - <https://www.northerntrust.com/privacy-policy>;
 - ii. Northern Operating Services Private Limited in India and the Northern Operating Services Asia Incorporated in the Philippines for the purposes of supporting activities

related to Fund administration including transfer agency, investor servicing, transaction processing, reporting and record keeping - <https://www.northerntrust.com/privacy-policy>;

- iii. eGain, located in the USA, for the purposes of supporting investor correspondence - <http://www.egain.com/privacy-policies/>;
 - iv. Victor Buck, located in Luxembourg, for the purposes of supporting investor mailing - <https://www.victorbuckservices.com/disclaimer>;
 - v. Paragon, located in the UK for the purposes of supporting investor mailing and correspondence - <http://www.paragon-europe.com/en-gb/content/privacy-policy-0>;
2. to enable the Fund to carry out the obligations under the contract with a registered shareholder or in anticipation of an applicant for shares becoming a registered shareholder;
 3. to anyone providing a service to the Fund or acting as the Fund's agent (which may include the distributor, the investment manager and companies within their group of companies, the administrator and its or their sub-contractors), as data processors, for the purposes of providing services to the Fund and on the understanding that they will keep the Personal Data confidential;
 4. where Personal Data needs to be shared with the depositary appointed to the Fund, in order to enable it to discharge its legal and regulatory obligations;
 5. in limited circumstances, where the administrator to the Fund is subject to a separate legal obligation requiring it to act as controller of the Personal Data, including where it is required to use the Personal Data for the discharge of its own AML obligations, or where an Individual has otherwise consented to the Personal Data being shared with the administrator for specific purposes;
 6. where the registered shareholder or applicant for shares is a client of the Hermes Group, a third party financial advisor or investment manager, or a company within its group of companies, with such company or advisor for the purposes outlined above;
 7. where the Fund needs to share Personal Data with its auditors, and legal and other advisors;
 8. in the event of a merger or proposed merger, any (or any proposed) transferee of, or successor in title to, the whole or any part of the Fund's business, and their respective officers, employees, agents and advisers, to the extent necessary to give effect to such merger; and,
 9. the disclosure is required by law or regulation, or court or administrative order having force of law, or is required to be made to any of the Fund's regulators.

The Fund will not otherwise share Personal Data with any third party unless it receives the prior written consent of the relevant Individual to do so.

Investment Manager as a Controller

Your Personal Data will be processed by the Investment Manager acting in the capacity of controller for the purposes of performing the contract with a registered shareholder, or in anticipation of an applicant for shares becoming a registered shareholder, namely to facilitate the calculation and payment of Fund Rebates.

All data processed by the Investment Manager stays inside the European Economic Areas (“**EEA**”) and is not shared with any other third parties apart from competent authorities (including tax authorities), courts and bodies as required by law or requested or to affiliates for internal investigations and reporting.

International Transfer of Data

Personal Data may be transferred outside Ireland in connection with administering a registered shareholder’s account(s) and / or in anticipation of an applicant for shares becoming a registered shareholder, in accordance with an Individual’s instructions, where an Individual has explicitly consented, and / or as otherwise required or permitted by law.

The disclosure of Personal Data to the third parties set out above may involve the transfer of data to other jurisdictions outside the EEA. The countries that may process data that are outside the EEA are the USA, India, and the Philippines. These countries may not have the same data protection laws as your jurisdiction and in that case the Fund shall use reasonable efforts to implement contractual protections for the Personal Data.

The Fund has authorised the Administrator as its agent to put in place European Commission approved standard contractual clauses (EU Controller to non-EU or EEA processor 2010/87/EU) relevant with the parties to whom Personal Data will be transferred. Please contact the Administrator for copies of the Standard Contractual Clauses that have been entered into on behalf of the Fund.

Special Categories Personal Data

The Fund does not process any special categories of personal data.

Third Party Providers of Information

The Fund may obtain Personal Data relating to Individuals from someone other than that Individual. This may include Personal Data relating to beneficial owners, partners, directors, officers, employees, advisors or other related persons of an investor or of the person providing the Personal Data. The Personal Data may be obtained from a variety of sources, such as financial advisors to investors, employers of Individuals, and / or direct and indirect service providers to the Fund, such as vendors providing AML and sanctions checking databases.

The person providing the information will be asked to warrant that it will only do so in accordance with applicable data protection laws, and that it will ensure that before doing so, the Individuals in question are made aware of the fact that the Fund will hold information relating to them and that it may use it for any of the purposes set out in this Privacy Statement, and where necessary that it will obtain consent to the Fund’s use of the information. The Fund may, where required under applicable law, notify those Individuals that they have been provided with their Personal Data and provide a copy of this Privacy Statement to them.

Data Integrity and Security

The Fund, Administrator and Investment Manager maintain the reliability, accuracy, completeness and currency of Personal Data in their databases and to protect the privacy and security of their databases. The security measures in place on our computer systems aim to prevent the loss, misuse or incorrect alteration of the information you provide.

The Fund, Administrator and Investment Manager update and test security technology on an ongoing basis. The Administrator and Investment Manager restrict access to your Personal Data to those

employees who need to know that information to provide services to you. In addition, the Administrator and Investment Manager train their employees about the importance of confidentiality and maintaining the privacy and security of your information.

The Fund, Administrator and Investment Manager encourage you to ensure that your Personal Data is accurate and kept up to date so please update any information you have provided, or write to us at the address listed under the **“How to contact the Fund”** section.

Retention of Personal Data

The Fund is obliged to retain certain information to ensure accuracy, to help maintain quality of service and for legal, regulatory, fraud prevention and legitimate business purposes.

It is obliged by law to retain AML related identification and transaction records for six years from the end of the relevant investor relationship or the date of the transaction respectively.

Other information will be retained for no longer than is necessary for the purpose for which it was obtained by the Fund or as required or permitted for legal, regulatory, fraud prevention and legitimate business purposes. In general, the Fund (or its service providers on its behalf) will hold this information for a period of seven years, unless it is obliged to hold it for a longer period under law or applicable regulations.

The Fund will also retain records of telephone calls and any electronic communications for a period of five years and, where requested by the Central Bank, for a period of up to seven years.

Complaints and enquiries by Individuals

The Fund, Administrator and Investment Manager try to meet the highest standards when collecting and processing Personal Data. For this reason, the Fund, Administrator and Investment Manager take any complaints they receive about this very seriously. The Fund, Administrator and Investment Manager encourage people to bring it to their attention if they think that the collection or use of information is unfair, misleading or inappropriate.

You also have the right to correct any inaccuracies in, and in certain circumstances, to request erasure, or restriction on the use, of your Personal Data, and to object to certain uses of your Personal Data, in each case subject to the restrictions set out in applicable data protection laws. Further information on these rights and the circumstances in which they may arise in connection with the Fund, Administrator and Investment Manager’s processing of Personal Data can be obtained by writing to the address specified above.

Where the Fund is relying on a legitimate purpose of the Fund or a third-party recipient of the Personal Data, in order to use and disclose Personal Data, you are entitled to object to such use or disclosure of your Personal Data. If you do so, the Fund will cease to use and process the Personal Data for that purpose unless it can show there are compelling legitimate reasons for it to continue or it needs to use the Personal Data for the purposes of legal claims.

In limited circumstances, you may also have the right to data portability in respect of certain of your Personal Data, which means you can request that the Fund provides it to you in a structured, commonly used and machine-readable format, or transmit it to your third-party nominee where this is technically feasible.

If you want to make a complaint about the way the Fund, Administrator and/or Investment Manager has processed your Personal Data, you can contact us directly or lodge a complaint with a supervisory authority in the EU Member State (i.e., the Data Protection Commission in Ireland) of your habitual residence or place of work or in the place of the alleged infringement if you consider that the processing of Personal Data relating to you carried out by the Fund or its service providers infringes your rights under applicable data protection laws.

An Individual's Rights in relation to Personal Data

An Individual may at any time request a copy of his / her Personal Data from the Fund. This right can be exercised by writing to the Fund at the address specified below.

An Individual also has the right to correct any inaccuracies in, and in certain circumstances, to request erasure, or restriction on the use, of his / her Personal Data, and to object to certain uses of his / her Personal Data, in each case subject to the restrictions set out in applicable data protection laws. Further information on these rights, and the circumstances in which they may arise in connection with the Fund's processing of Personal Data can be obtained by writing to the Fund at the address specified below.

In any case where the Fund is relying on an Individual's consent to process his / her Personal Data (for example, explicit consent for special categories of personal data) that Individual has the right to change his / her mind and withdraw consent by writing to the address specified below.

Where the Fund is relying on a legitimate purpose of the Fund, a member of Hermes Group of companies or a third-party recipient of the Personal Data, in order to use and disclose Personal Data, an individual is entitled to object to such use of his / her Personal Data, and if he /she does so, the Fund will cease to use and process the Personal Data for that purpose unless the Fund can show there are compelling legitimate reasons for it to continue or it needs to use the Personal Data for the purposes of legal claims.

In limited circumstances, an Individual may also have the right to data portability in respect of certain of his / her Personal Data, which means he / she can request that the Fund provide it to him / her in a structured, commonly used and machine-readable format, or transmit it to his / her third-party nominee where this is technically feasible.

An Individual also has the right to lodge a complaint about the processing of his / her Personal Data by the Fund with the Data Protection Commission at

Canal House, Station Road, Portland, Co Laois
R32 AP23, Ireland. Phone +353 (0761) 104 800 | or 1890 25 22 31

info@dataprotection.ie

How to contact the Fund

If you wish to make a subject access request or complaints relating to Personal Data held about you by the Fund, Administrator or Investment Manager, please write to:

The Information Protection Coordinator,
Hermes Fund Managers Limited,
150 Cheapside, London EC2V 6ET

Or InfoProtect@hermes-investment.com

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