

Summit Investment Funds plc

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Privacy Notice

Introduction

This notice sets out details of how and why Summit Investment Funds Plc of Irish Life Centre, Lower Abbey Street, Dublin 1, Ireland, (the “**Company**”, “**we**”, “**us**”, “**our**”) and third parties acting on our behalf collect and process personal information in connection with investments in Summit Investment Funds Plc (the “**Fund**”). We do this in compliance with our obligations under applicable data protection law. This notice explains what personal data is collected, the purposes for which it is used, the third parties to whom it may be disclosed and how individuals can exercise their rights in relation to their personal data.

This notice applies to the collection and processing of personal information relating to any individual investor in the Fund and personal information relating to individuals associated with corporate investors in the Fund, such as a corporate investor’s directors, shareholders, employees, professional advisers and other personnel. References to “**you**” and “**your**” mean the relevant individuals who are the subjects of the personal data to which this notice relates and “**your company**” means a corporate investor with which an individual is associated. Corporate investors should ensure that this notice is provided to any individual whose personal data the corporate investor has provided to us, such as its directors, shareholders, employees, and other personnel, as soon as practicable.

About Us

The Company is the controller of the personal data collected via the application form and in connection with our dealings with you or your company in relation to investments in the Fund. The Company engages third party service providers to process such personal data on behalf of the Company and those third parties act as processors. If you have any questions about the use of your personal data by or on behalf of the Fund, please contact us at the above address.

Personal Data that we Process

We collect personal data relating to you that is provided to us in the application form and in connection with our dealings with you or your company in relation to investments in the Fund, including your name, signature, postal address, email address, fax number, date of birth, and other contact details.

We may also collect personal data in relation to you in connection with ensuring compliance with our legal obligations including your PPS number; passport number; photographic identification and verification such as copies of your passport; and address verification. For the purposes of carrying out due diligence, we may also collect information relating to your status as an ultimate beneficial owner of an entity, or as a politically exposed person.

We may collect and process personal data relating to you in connection with our on-going relationship with you or your company, such as via correspondence and calls, and in connection with

our administration of you or your company's investment in the Fund. We may record telephone calls for the purposes of record keeping, security and training.

In addition, we may collect personal data relating to you from third party sources in connection with complying with legislation relating to anti-money laundering, taxation, and other legislation applicable to investment funds.

We require you to complete the mandatory fields identified in our application form for the purpose of entering into a contract with you or your company. Please note that some of the information required by our application form is necessary in order for us to administer your or your company's investment in the Fund and if you or your company do not provide us with these required details, we may decline your or your company's application to become an investor. Please be advised that you may be contractually obliged to ensure that certain information that we hold relating to you is up to date pursuant to the application form.

Purposes of Processing and Legal Basis

Personal data that you or your company provides in your application form, or that we otherwise obtain in relation to you, will be processed for the following purposes:

- processing your or your company's application to become an investor;
- establishing your identity, and providing, servicing and administering your or your company's investment;
- complying with our legislative and regulatory obligations in connection with our dealings with you or your company, including under applicable law regarding anti-money laundering, taxation, the regulation of collective investment schemes, or the provision of financial services;
- for direct marketing purposes, subject to any preferences you communicate to us;
- if applicable, processing the fact that you are a politically exposed person, to comply with applicable legal obligations;
- to communicate with you by way of notice pursuant to applicable legislation or the Fund's Constitution;
- maintaining appropriate business records, including maintaining appropriate registers of shareholders;
- statistical analysis and market research;
- internal training and management of personnel;
- to respond to or evaluate any queries or complaints in relation to your or your company's investment;
- internal and external audits and, where necessary, investigations;
- establishing, exercising or defending legal claims; and

The legal grounds that we rely on to process your personal data are:

- that this is necessary to comply with our legal obligations;
- that this is necessary for the purposes of our legitimate interests or the legitimate interests of a third party to whom we provide your personal data. We will not process your personal data for these purposes if our or the third party's legitimate interests should be overridden by your own interests or fundamental rights and freedoms. The legitimate interests pursued by us in this regard include:
 - conducting our business in a responsible and commercially prudent manner and dealing with any disputes that may arise;
 - preventing, investigating or detecting theft, fraud or other criminal activity;
 - pursuing our corporate and social responsibility objectives;
- where you are an individual investor, that this is necessary to take steps at your request prior to entering into our contract with you and for the performance of our contract with you.

Recipients of Data

We may disclose your personal data to various recipients in connection with the above purposes, including:

- to the Administrator;
- to Summit Asset Managers Limited, the Fund's UCITS management company
- to Irish Life Investment Managers Limited, the Fund's investment manager;
- to the Fund's distributor(s);
- to the Fund's Money Laundering Reporting Officer;
- to the Revenue Commissioners and other tax authorities as required by applicable law, including FATCA or CRS;
- to the Central Bank of Ireland, auditors, or other competent regulatory authorities and bodies as requested or required by law;
- to other third parties who we engage to provide services to us, such as professional advisers, auditors and IT service providers;
- to credit reference agencies in order to carry out money laundering and identity checks and to comply with legal obligations;
- to other members of our corporate group.

Transfers Abroad

In connection with the above purposes we may transfer your personal data outside the European Economic Area, including to a jurisdiction which is not recognised by the European Commission as providing for an equivalent level of protection for personal data as is provided for in the European Union. If and to the extent that we do so, we will ensure that appropriate measures are in place to comply with our obligations under applicable law governing such transfers, which may include: (a) entering into a contract governing the transfer which contains the “standard contractual clauses” approved for this purpose by the European Commission; (b) in respect of transfers to the United States of America, ensuring that the transfer is covered by the EU-US Privacy Shield framework; or (c) transferring your personal data pursuant to binding corporate rules.

Further details of the measures that we have taken in this regard and the territories to which your personal data may be transferred are available by contacting us at our address set out at the beginning of this notice

Retention

We will retain your personal data for the duration of your or your company’s investment in the Fund and for such a period of time after the investment ends as is necessary to comply with our obligations under applicable law and, if relevant, to deal with any claim or dispute that might arise.

Your Rights

You have the following rights, in certain circumstances and subject to applicable exemptions, in relation to your personal data:

- the right to access the personal data that we hold about you, together with other information about our processing of that personal data;
- the right to require us to rectify any inaccuracies in your personal data;
- the right to require us to erase your personal data;
- the right to request that we no longer process your personal data for particular purposes;
- the right to object to our use of your personal data or the way in which we process it; and
- where the legal basis for processing is that it is necessary for the performance of a contract with you, the right to receive your personal data, which you provided to us, in a structured, commonly used and machine-readable format or to require us to transmit that data to another controller.

In order to exercise any of the rights set out above, please contact us at the address set out at the beginning of this notice.

Complaints

If you are not happy with the way we have used your information or addressed your rights, you have the right to lodge a complaint with the Irish Data Protection Commission (info@dataprotection.ie) or your local supervisory authority.