



OUTSOURCING and/or PERSONAL DATA SUB-PROCESSING

1. OUTSOURCED AND/OR PERSONAL DATA SUB-PROCESSING SERVICES TO SERVICE PROVIDERS/SUB-PROCESSORS APPOINTED BY EDMOND DE ROTHSCHILD (EUROPE) ("EdR(E)"):

Country of establishment of the Service Provider (and its sub-contractors, if any)/Sub-Processor	Category(ies) of outsourced services	Is the relevant entity a sub-processor appointed by EDR(E) ¹ to conduct specific personal data sub-processing activities within the meaning of GDPR ² ?	Type of information transmitted or made available
(EdR Group entity): Luxembourg	- services regarding domiciliation of clients qualified as undertakings for collective investments and their related companies	yes (name of the appointed entity: Edmond de Rothschild Asset Management (Luxembourg))	client data, client financial data and/or personal data relating to any relevant natural persons whose personal data is processed and transmitted or made available by EdR(E) in the context of the outsourced services
(EdR Group entity): France	- reception/transmission - and execution of orders - risk management monitoring services - post-market services regarding transactions in financial instruments (services dedicated to some clients qualified as undertakings for collective investments)	no	anonymised transaction data
(EdR Group entity): Switzerland and (EdR Group entity's sub-contractor): France	- IT Technical assistance (help desk, vendor management, middle office), IT Analysis and Development, IT Hosting and Operating services.	no	client data, client financial data and/or personal data relating to any relevant natural persons whose personal data is processed and transmitted or made available by EDR(E) in the context of the outsourced services

¹ EDR(E) acting as **processor** (within the meaning of GDPR) in accordance with the provisions of its service agreements

² GDPR means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data



and (EdR Group entity): Switzerland	<ul style="list-style-type: none"> - assistance & monitoring services (in relation to the banking system of EdR(E)) 	no	
(EdR Group entity): Switzerland	<ul style="list-style-type: none"> - treasury & FX services 	no	anonymised transaction data
(EdR Group entity): Switzerland	<ul style="list-style-type: none"> - back office services related to treasury & FX services - Collateral management services 	no	client name (only for clients qualified as undertakings for collective investments), client account numbers and portfolio information
(EdR Group entity): Switzerland	<ul style="list-style-type: none"> - assistance in the operational treatment of account opening and management of changes in the clients' situations - Credit services, financial and counterparty risk management services - Monitoring services in relation to best execution and market abuse alerts 	no	client data, client financial data and/or personal data relating to any relevant natural persons whose personal data is processed and transmitted or made available by EdR(E) in the context of the outsourced services
(service provider external to EdR group): Luxembourg and (service provider's sub-contractors) Canada Hong-Kong	<p>Outsourced services exclusively related to clients being undertakings for collective investment or related to said clients:</p> <ul style="list-style-type: none"> - investment restrictions and policies monitoring support services - middle office and OTC derivatives services - fund execution services - record keeping services and account opening and maintenance services - invoicing services - CSDR reporting support services - IT support services - Swift Service Bureaux - reconciliation support services 	no	
(service provider external to EdR group) Switzerland and (service provider's sub-contractor): Switzerland	<ul style="list-style-type: none"> - IT platform and ancillary IT support services - application management services - license and maintenance services - IT Hosting and Operating services. 	no	



(service provider external to EdR group): Luxembourg	- data center services	no	
(service provider external to EdR group): Luxembourg	- desktop publishing, printing, enveloping and mailing services	yes (name of the appointed entity: Victor Buck Services)	
(service provider external to EdR group): Luxembourg	- archiving & document destruction services	yes (name of the appointed entity: Lab Luxembourg S.A)	
(service provider external to EdR group): Luxembourg	- API services (in the context of CSSF Circular 20/747 regulatory reporting to the CSSF containing details regarding client accounts and safe deposits)	no	encrypted client data and encrypted personal data relating to any relevant natural persons whose personal data is processed and transmitted or made available by EDR(E) in the context of the outsourced services
(service provider external to EdR group): Spain & Luxembourg	Tax reporting services	yes (name of appointed entity : S2G (Servicios Generales de Gestión SLU))	client data, client financial data and/or personal data relating to any relevant natural persons whose personal data is processed and transmitted or made available by EdR(E) in the context of the outsourced services
(service provider external to EdR group): Belgium	- desktop publishing, printing, enveloping and mailing services dedicated to clients of Edmond de Rothschild (Europe), Belgian branch	no	client data, client financial data and/or personal data relating to any relevant natural persons whose personal data is processed and transmitted or made available by EdR(E) in the context of the outsourced services