

## EDRAM(LUX) - OUTSOURCING and/or PERSONAL DATA SUB-PROCESSING DEDICATED TO PRIVATE EQUITY AND REAL ESTATE FUNDS

OUTSOURCED AND/OR PERSONAL DATA SUB-PROCESSING SERVICES TO SERVICE PROVIDERS/SUB-PROCESSORS APPOINTED BY  
EDMOND DE ROTHSCHILD ASSET MANAGEMENT (LUXEMBOURG) ("EDRAM(LUX)"):

Country of establishment of the Service Provider/Sub-Processor	Category(ies) of outsourced services	Is the relevant entity a sub-processor appointed by EDRAM(LUX) <sup>1</sup> to conduct specific personal data sub-processing activities within the meaning of GDPR?	Type of information transmitted or made available
(EDR Group entity)  Luxembourg	<ul style="list-style-type: none"> <li>- IT services</li> <li>- archiving &amp; document destruction services</li> </ul>	<p>yes in the context of the following outsourced services:</p> <ul style="list-style-type: none"> <li>- archiving &amp; document destruction services</li> </ul> <p>(name of the appointed entity: Edmond de Rothschild (Europe))</p>	<p>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 EDRAM(LUX) in the context of the outsourced services</p>
(service provider external to EDR Group)  Luxembourg  and  (service provider's sub-contractors)  Ireland France Germany United States of America <sup>2</sup>	<ul style="list-style-type: none"> <li>- accounting services (bookkeeping and periodic closing of accounts, annual accounts)</li> </ul>	<p>yes</p> <p>(name of the appointed entity: RSM Financial Services Luxembourg)</p>	
(service provider external to EDR Group)  Luxembourg	<ul style="list-style-type: none"> <li>- desktop publishing, printing, enveloping and mailing services</li> </ul>	<p>yes</p> <p>(name of the appointed entity: Victor Buck Services)</p>	
(service provider external to EDR Group)  France  and	<p>if applicable (in the context of investor portal services):</p> <ul style="list-style-type: none"> <li>- provision of a communication and exchange portal for</li> </ul>	<p>yes</p> <p>(name of the appointed entity: eFront Financial Solutions, Inc.)</p>	<p>client data, AML/FCT investor 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 EDRAM(LUX) in the context of the outsourced services</p>

<sup>1</sup> EDRAM(LUX) acting as **processor** (within the meaning of GDPR) in accordance with the provisions of its service agreements

<sup>2</sup> Countries with no processing of client's personal data

(service provider's sub-contractors)  United States of America	clients and investors		
(service provider external to EDR Group)  Luxembourg  and  (service provider's sub-contractors)  France Madagascar <sup>2</sup>	If applicable: - provision of an invoicing portal for the processing and validation of invoices	yes (name of the appointed entity: Numen Europe)	client data, invoicing data and/or personal data relating to any relevant natural persons whose personal data is processed and transmitted or made available by EDRAM(LUX) in the context of the outsourced services