

EDRAM (LUX) - OUTSOURCING and/or PERSONAL DATA SUB-PROCESSING FOR TRADITIONAL CLIENTS

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) 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	<ul style="list-style-type: none"> - IT services - archiving & document destruction services 	<p style="text-align: center;">yes</p> <p>in the context of the following outsourced services:</p> <ul style="list-style-type: none"> - archiving & document destruction services <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) Canada ³ Malaysia ³ France ³ Spain ³	<ul style="list-style-type: none"> - central administration services - investment restrictions and policies monitoring support services - KIID services - FATCA & AEOI services - invoicing & VAT services - IT support services 	<p style="text-align: center;">yes</p> <p>in the context of the following outsourced services:</p> <ul style="list-style-type: none"> - central administration services - FATCA & AEOI services - Invoicing & VAT services <p>(name of the appointed entity: CACEIS Bank, Luxembourg Branch)</p>	
(service provider external to EDR Group) Luxembourg	<ul style="list-style-type: none"> - desktop publishing, printing, enveloping and mailing services 	<p style="text-align: center;">yes</p> <p>(name of the appointed entity: Victor Buck Services)</p>	
(EDR Group entity) France	<p>if applicable in the context of EOS & Manco services:</p> <ul style="list-style-type: none"> - data management, middle office and IT 	<p style="text-align: center;">no</p>	

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

² if applicable, the (global) distributor of the Fund, to which EDRAM(LUX) (acting as **processor** in accordance with the provisions of the relevant (global) distribution agreement) has delegated marketing/distribution functions, is a sub-processor appointed by EDRAM(LUX) to conduct specific personal data sub-processing activities within the meaning of GDPR

³ Countries with no processing of client's personal data



	subcontractor and project management services		
(service provider external to EDR Group) Luxembourg and (service provider's sub-contractors) France Madagascar ³	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