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(中譯文)

**Manulife Global Fund**

**宏利環球基金**

Société d'investissement à capital variable

可變資本投資公司

Registered office: 31, Z.A. Bourmicht, L-8070 Bertrange

Grand Duchy of Luxembourg

註冊辦事處：31, Z.A. Bourmicht L-8070 Bertrange

Grand Duchy of Luxembourg

**(the “Company”)**

**(本公司)**

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Luxembourg, 5 October 2023

2023 年 10 月 5 日，盧森堡

Please be informed that your Personal Data (as defined below) may be collected, recorded, stored in digital form or otherwise, adapted, transferred or otherwise processed and used in accordance with the law of 1 August 2018 on the organization of the National Data Protection Commission and the implementation of the GDPR, the European Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation or “GDPR”) and any other European Union or national legislation which implements or supplements the foregoing.

謹通知您，您的個人資料（定義如下）可能會根據 2018 年 8 月 1 日關於國家資料保護委員會之組織及 GDPR 實施之法律、關於保護自然人之個人資料處理及該等資料自由流通之歐盟規則第 2016/679 號（一般資料保護規則或「GDPR」），及實施或補充上述規定之任何其他歐盟或國家立法，以數位形式或其他方式蒐集、記錄、儲存或進行編輯、轉移或以其他方式處理及使用。

In this privacy notice, references to "we", "us" or "our" are references to the Company, acting as controller with respect to the Personal Data.

在本隱私權聲明中，提及之「我們」或「我們的」係指作為個人資料控制者之本公司。

This privacy notice applies to you and to any third parties whose information you provide to us in connection with our relationship with you, such as your authorized representatives or beneficial owners (the natural persons whose Personal Data we process being referred to as “Data Subjects”). Please ensure that a copy of this privacy

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notice is provided to any third parties whose Personal Data (as defined below) you provide to us. You also confirm that you have obtained the valid consent from third parties whose information you provide to us (in connection with your investment in the Company) for the collection and processing of their personal data in accordance with the Privacy Notice, where applicable. We may update this privacy notice from time to time and we will notify you in writing of any changes we make. Please also ensure that any Data Subjects whose information you provide to us in connection with our relationship with you are notified of such updates. If you have any questions concerning this Privacy Notice, please contact our Data Protection Officer at Manulife Investment Management (Ireland) Limited whose registered address is at Second Floor, 5 Earlsfort Terrace, Dublin D02 CK83, Ireland, [dpo\\_europe@manulifeam.com](mailto:dpo_europe@manulifeam.com). 本隱私權聲明適用於您以及任何由您提供予我們的第三人資訊，並與我們與您之間的關係相關者，例如您的授權代表人或實質受益人（我們處理其個人資料之自然人下稱「資料主體」）。請確保向您提供予我們其個人資料（定義如下）之任何第三人提供本隱私權聲明之副本。您亦確認您已取得您向我們提供其資訊（與您對本公司之投資相關）之第三人的有效同意，以便根據本隱私權聲明蒐集及處理其個人資料（如適用）。我們可能會不時更新本隱私權聲明，而且我們將以書面形式通知您我們所為之任何更改。另請確保其資訊係由您提供予我們（與我們與您的關係有關）的任何資料主體均會收到此類更新之通知。如果您對本隱私權聲明有任何疑問，請聯絡 Manulife Investment Management (Ireland) Limited 之資料保護長，其註冊地址為 Second Floor, 5 Earlsfort Terrace, Dublin D02 CK83, Ireland，[dpo\\_europe@manulifeam.com](mailto:dpo_europe@manulifeam.com)。

You, as a Data Subject, remain responsible to inform any of your potential authorised representatives or beneficial owners about the existence and content of this privacy notice.

身為資料主體，您仍有責任告知您的任何潛在授權代表人或實質受益人有關本隱私權聲明之存在及其內容。

## 1. Which categories of Personal Data are concerned?

### 1. 涉及哪些類別之個人資料？

“Personal Data” includes data regarding an individual’s identification such as name and first name, date of birth, place of residence, fiscal domicile, address, nationality, telephone number, email address, bank account details, tax number and copies of ID or passport. For the avoidance of doubt, in case of investors which are companies, Personal Data includes personal data of individuals linked to such companies.

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「個人資料」包括有關個人身分之資料，例如姓名、出生日期、居住地、財務住所、地址、國籍、電話號碼、電子郵件地址、銀行帳戶詳細資料、稅號以及身分證或護照影本。為免疑義，如投資人是公司，則個人資料包括與此等公司有關聯之個人之個人資料。

## 2. Where do we obtain Personal Data about you?

### 2. 我們從哪裡獲取有關您的個人資料？

Personal Data may be collected, used and stored by us from the following sources:

我們可能從以下來源蒐集、使用及儲存個人資料：

i. information provided verbally, electronically or in writing, including information provided on subscription forms, questionnaires, websites and other forms provided by Data Subjects or the company to which they are linked;

i. 以口頭、電子或書面形式提供之資訊，包括申購表格、調查問卷、網站以及資料主體或與其有關聯之公司提供之其他表格上提供的資訊；

ii. information that is generated in the course of the business of the Company as an investment company which qualifies as an undertaking for collective investment in transferable securities (UCITS);

ii. 本公司作為合格可轉讓證券集合投資事業（UCITS）之投資公司於業務過程中產生之資訊；

iii. information obtained from international sanctions lists, publicly available websites, financial market infrastructures (including settlement service providers, central securities depositories, exchanges, central clearing counterparties and other similar entities) and other public data sources;

iii. 從國際制裁名單、公開網站、金融市場基礎設施（包括結算服務提供者、中央證券存託機構、交易所、及中央結算機構及其他類似實體）及其他公開資料來源獲得之資訊；

iv. the performance of contracts that may be entered into by the Company with Data Subjects, the companies they are linked to or third parties (as described below) from time to time;

iv. 本公司履行可能不時與資料主體、與其相關聯之公司或第三人（如下所述）簽訂之合約；

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- v. the use of products and services and your relationship with us, as well as with our affiliates, including members of the Manulife Group (being Manulife Financial Corporation and its subsidiaries and affiliates); and
- v. 產品及服務之使用，以及您與我們，及您與我們的關係企業之關係，包括宏利集團成員（即 Manulife Financial Corporation 及其子公司及關係企業）；及
- vi. information that may be received from third parties, being:
- a. Manulife Investment Management (Ireland) Limited acting as the management company of the Company;
  - b. the following distributor and sub-distributors (collectively “Distributors” and each a “Distributor”):
    - Manulife Investment Management (Ireland) Limited (the “General Distributor”)
    - Manulife Investment Management (Hong Kong) Limited
    - Manulife Investment Management (Singapore) Pte. Ltd.
    - Manulife Investment Management (Taiwan) Co., Limited
    - Manulife Investment Management (US) LLC
    - Manulife Investment Management (Ireland) Limited
  - c. Citibank Europe plc, Luxembourg Branch acting as the administrator, registrar and paying agent of the Company (the “Administrator, Registrar and Paying Agent”); and
  - d. Manulife Investment Management (Hong Kong) Limited acting as platform administration services provider in respect of the Company.
- vi. 可能從第三人收到之訊息，亦即：
- a. 作為本公司管理公司之 Manulife Investment Management (Ireland) Limited
  - b. 以下經銷商及副經銷商（合稱「經銷商」，各稱「經銷商」）：
    - Manulife Investment Management (Ireland) Limited（「總經銷商」）
    - 宏利投資管理（香港）有限公司
    - 宏利投資管理（新加坡）私人有限公司
    - 宏利證券投資信託股份有限公司
    - 宏利投資管理（美國）有限公司
    - Manulife Investment Management (Ireland) Limited
  - c. 擔任本公司之行政管理人、登記人及付款代理人 Citibank Europe plc 盧森堡分行（「管理人、登記人及付款代理人」）；及
  - d. 擔任本公司之平台行政服務提供者的宏利投資管理（香港）有限公司。

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### 3. Why do we process your Personal Data?

#### 3. 我們為什麼要處理您的個人資料？

The Personal Data will be processed by us and/or on our behalf (including by the above-mentioned third parties) if necessary for the purposes of:

如有必要，個人資料將由我們及/或由代表我們者（包括上述第三人）處理：

##### i. performance of contracts, including:

- a. processing subscription, redemption and switching orders for shares in the Company;
- b. payments of dividends and other distributions to shareholders;
- c. maintaining the register of shareholders of the Company;
- d. account and distribution fees administration;
- e. cash movements for transactions settlement purposes;
- f. calculation and payment of trailer fees remuneration; and
- g. reconciliation of cash accounts;

##### i. 合約之履行，包括：

- a. 處理本公司股份之申購、買回及轉換指示；
- b. 向股東支付股利及其他配息；
- c. 備存本公司股東名冊；
- d. 帳戶及經銷費用管理；
- e. 用於交易結算目的之現金流通；
- f. 服務費報酬之計算及支付；及
- g. 現金帳戶對帳；

##### ii. compliance with applicable legal and regulatory obligations which the Company is subject to, such as in relation to:

- a. anti-money laundering and terrorism financing;
- b. know your client (KYC) obligations;
- c. crime detection, prevention, investigation and prosecution;
- d. tax identification in accordance with applicable legal obligations, including pursuant to the U.S. Foreign Account Tax Compliance Act (“FATCA”) and the Organisation for Economic Co-operation and Development’s Common Reporting Standard for the Automatic Exchange of Information (“CRS”) and any relevant regulations in connection therewith; and
- e. any applicable supervisory requirements.

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- ii. 遵循本公司須遵守之適用法律及監管義務，例如：
  - a. 反洗錢及資恐；
  - b. 認識您的客戶(KYC)義務；
  - c. 犯罪偵查、預防、調查及起訴；
  - d. 根據適用之法律義務進行稅務識別，包括根據美國外國帳戶稅收遵從法案(「FATCA」)及經濟合作暨發展組織就自動交換財務帳戶資料之共同申報準則(「CRS」)及任何相關規定；及
  - e. 任何適用之監管要求。
- iii. the legitimate interest of the Company (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms):
  - a. assessing and managing risk (in order to determine and manage levels of risk to which the Company is exposed);
  - b. monitoring and recording of calls and electronic communications for quality, security, training, investigation and fraud prevention purposes (to improve the quality of the Company's services and products, ensure the security of the Company and its business, and detect and protect against fraud); and
  - c. production of quality and activity reports (to improve the Company's services and products).
- iii. 為本公司之合法利益（於您的利益、基本權利或自由不凌駕於此類合法利益之範圍內）：
  - a. 評估及管理風險（以決定及管理本公司面臨之風險等級）；
  - b. 出於品質、安全、培訓、調查及預防詐欺之目的監控及記錄通話及電子通訊（以提高本公司服務及產品之品質，確保本公司及其業務之安全，並偵測及防止詐欺）；及
  - c. 製作品質及活動報告（以改善本公司之服務及產品）。

We may also rely on consent as a legal basis for processing of the Data Subject's Personal Data. If consent is relied on, it will be made clear to the Data Subject at the time his/her consent is asked for. The Data Subject will have the right to withdraw such consent at any time.

我們亦可能依據同意作為處理資料主體個人資料之法律依據。如係依據同意，我們將於請求資料主體同意時向其明確說明。資料主體有權隨時撤回該等同意。

#### 4. To whom do we disclose your Personal Data?

#### 4. 我們向誰揭露您的個人資料？

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Generally, we will not provide Personal Data to outside firms, organisations or individuals, unless it is required in the normal course of business, or as otherwise permitted or required by law, or on request from an applicable regulator.

一般而言，除非係於正常業務過程中有所需要，或法律允許或要求，或適用之監管機構要求，否則我們不會向外部公司、組織或個人提供個人資料。

We may disclose certain Personal Data, on a “need to know” basis:

我們可能會在「需要知道」之基礎上向下述揭露某些個人資料：

i. to Manulife Investment Management (Ireland) Limited acting as the management company of the Company;

i. 向作為本公司管理公司之 Manulife Investment Management (Ireland) Limited；

ii. to Citibank Europe plc, Luxembourg Branch acting as the Administrator, Registrar and Paying Agent of the Company;

ii. 向擔任本公司的行政管理人、登記人及付款代理人 Citibank Europe plc 盧森堡分行；

iii. to Citibank Europe plc, Luxembourg Branch acting as the depositary of the Company;

iii. 向作為本公司存託機構之 Citibank Europe plc, Luxembourg Branch；

iv. to any Distributor;

iv. 向任何經銷商；

v. to any member of the Manulife Group in connection with any internal risk, compliance and reporting and/or administrative services processes and policies, in particular Manulife Financial Corporation, Manulife Investment Management (US) LLC, Manulife Investment Management (Hong Kong) Limited and Manulife Investment Management (M) Berhad;

v. 向任何內部風險、法律遵循及報告及/或行政服務流程及政策有關之宏利集團任何成員，特別是 Manulife Financial Corporation、宏利投資管理（美國）有限公司、宏利投資管理（香港）有限公司及 Manulife Investment Management (M) Berhad；

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vi. to any bank or other party with whom the Company conducts or intends to conduct business that has requested such information;

vi. 向與本公司從事業務或擬從事業務之任何銀行或其他當事人，而其索取此類資訊者；

vii. to the government of Luxembourg (or to other foreign fiscal or tax authorities, as applicable) as well as to other public authorities (including supervisory or regulatory authorities) in order to comply with any applicable Luxembourg law and the obligation of the Luxembourg government (or other foreign fiscal or tax authorities, as applicable) to automatically exchange information as outlined above, and for the avoidance of doubt, including to any other governmental or regulatory authority, including tax authorities, in the European Economic Area, in any country which is a participating jurisdiction from time to time under CRS or in the United States of America;

vii. 向盧森堡政府（或其他外國財政或稅務機關，如適用）以及其他公共機關（包括監督或監管機關）提供資訊，以遵守任何適用之盧森堡法律及盧森堡政府（或其他外國財政或稅務機關，如適用）自動交換上述訊息，而為免疑義，此包括任何其他政府或監管機構，包括位於歐洲經濟區及不時根據 CRS 參與管轄，或位於美國之稅務機關；

viii. to any competent regulatory, prosecuting, tax or governmental authority having jurisdiction over us or our affiliates or any regulatory authority that requests such information in connection with any proposed investment or disposition of an investment;

viii. 向對我們或我們的關係企業有管轄權之任何主管機關、檢察機關、稅務或政府機構或任何要求提供與任何擬議投資或投資處置有關之資訊的監管機構；

ix. in connection with any litigation or other dispute or otherwise as necessary or appropriate to enforce the interests of the Company;

ix. 與任何訴訟或其他爭議有關，或為維護本公司利益而必要或適當之其他情況；

x. to our, our affiliates' or the above-mentioned third parties' directors, officers, employees, agents, administrators, attorneys, legal and tax advisors, accountants or other professional service providers (including administrative support providers and processors);

x. 向我們、我們的關係企業或上述第三人之董事、管理人員、員工、代理人、



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行政管理人員、律師、法律及稅務顧問、會計師或其他專業服務提供者（包括行政支援提供者及處理人員）；

xi. to other persons as required by any law, rule or regulation or in response to any legal process; and

xi. 根據任何法律、規則或法規之要求或為回應任何法律程序而向其他人提供；及

xii. otherwise as the Company deems reasonably necessary for the conduct of the Company's business.

xii. 其他本公司認為執行本公司業務合理必要的情況。

Access to Personal Data is restricted to those employees who need to know that information to provide services to the Company and its investors. We will require third party service providers to protect the confidentiality and privacy of your Personal Data and to use the information only for the purpose for which the disclosure is made. For this purpose, service providers receiving Personal Data are bound by agreement with us to keep Personal Data secure.

個人資料之存取權限僅限於需要了解該等資訊以便為公司及其投資人提供服務之員工。我們將要求第三方服務提供者保護您個人資料的機密性及隱私性，並僅將這些資訊用於所揭露的目的。為此，接收個人資料之服務提供者必須與我們達成協議，以確保個人資料的安全。

## 5. Where do we transfer your Personal Data?

### 5. 我們將您的個人資料轉移到哪裡？

Processing Personal Data for the purposes mentioned above may involve the transfer of Personal Data to third parties located outside the European Union, in countries where data protection laws might not exist or be of a lower or different standard than in the European Union, including the United States, India and Hong Kong.

為上述目的處理個人資料可能涉及將個人資料傳輸予位於歐盟以外之第三人，此等國家可能不具有資料保護法律，或資料保護法律之標準低於或不同於歐盟，包括美國、印度及香港。

We and any service provider acting on our behalf will ensure that a transfer of your Personal Data to these countries is carried out in compliance with the GDPR. Suitable

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safeguards are put in place ensuring that such transfer is carried out in compliance with the GDPR. A copy of such safeguards can be requested from the Company's Data Protection Officer or the relevant Distributor.

我們及代表我們行動之任何服務提供者，將確保將您的個人資料傳輸到這些國家／地區時符合 GDPR。會採取適當之保障措施以確保此類傳輸符合 GDPR。您可向本公司的資料保護長或相關經銷商索取此類保護措施之副本。

Your Personal Data will be transferred to the United States, India and Hong Kong based on standard data protection clauses adopted by the European Commission.

您的個人資料將根據歐盟委員會採用之標準資料保護條款轉移至美國、印度及香港。

## 6. How long do we keep your Personal Data?

### 6. 我們會將您的個人資料保留多久？

We will collect only such information that is useful and required for the performance of the services we provide to you. Any Personal Data may be held for a period of up to 10 years after the termination of the relationship between you and the Company and in any event no longer than necessary with regard to the purpose of the data processing or as required by law.

我們將僅蒐集就我們向您提供之服務有用且所需之資訊。任何個人資料於您及本公司之間的關係終止後最多可保留 10 年，且於任何情況下皆不會超過資料處理目的所需之時間或法律要求之時間。

## 7. Who is responsible for your Personal Data?

### 7. 誰對您的個人資料負責？

The Company, acting in its capacity as data controller in relation to your Personal Data, will be responsible for the lawful processing of your Personal Data.

本公司作為與您的個人資料相關之資料控制者，將負責合法處理您的個人資料。

We ensure the confidentiality, privacy and security of your Personal Data. Physical, electronic and procedural safeguards are maintained to protect any Personal Data.

我們確保您個人資料之機密性、隱私性及安全性，並維護實體、電子及程序性

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的保障措施以保護任何個人資料。

## 8. What are the Data Subject's rights in relation to Personal Data?

### 8. 資料主體對個人資料有哪些權利？

Under certain circumstances, the Data Subject has the right, in accordance with the GDPR, to:

在某些情況下，根據 GDPR，資料主體有權：

i. request access to his/her Personal Data and to request a copy of the Personal Data processed by or on behalf of the Company free of charge or subject to an administrative charge if the Data Subject's request is excessive or manifestly unfounded. This enables the Data Subject to receive a copy of the Personal Data we hold about him/her and to check that we are lawfully processing it;

i. 請求存取其個人資料，並免費索取由本公司或代表本公司者處理之個人資料副本，惟若資料主體之要求過量或明顯沒有根據，則需支付手續費。此可使資料主體得以取得我們持有之有關其個人資料之副本，並檢查我們是否合法處理該資料；

ii. request the rectification of his/her Personal Data in case of inaccuracy or incompleteness. This enables the Data Subject to have any incomplete or inaccurate information we hold about him/her corrected;

ii. 若其個人資料不準確或不完整，則可要求更正。此使資料主體得以更正我們所持有關於其任何不完整或不準確的資料；

iii. request the erasure of his/her Personal Data. This enables the Data Subject to ask us to delete or remove Personal Data where the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed. The Data Subject also has the right to ask us to delete or remove his/her Personal Data where the Data Subject has exercised his/her right to object to processing;

iii. 請求刪除其個人資料。當就蒐集或以其他方式處理之目的而言不再需要個人資料時，資料主體可以要求我們刪除或移除個人資料。如果資料主體行使反對處理之權利，則資料主體亦有權要求我們刪除或移除其個人資料；

iv. request the restriction of the processing of his/her Personal Data. This enables the Data Subject to ask us to suspend the processing of Personal Data about him/her, for

(本中譯本之內容與英文版本若有歧異，以英文版本之內容為準。)

example if the Data Subject wants us to establish its accuracy;

iv. 請求限制處理其個人資料。此使資料主體可要求我們暫停處理有關其個人資料，例如，如果資料主體希望我們確定其準確性時；

v. receive the Personal Data concerning him/her, which he/she has provided to us, in a structured, commonly used and machine-readable format and have those Personal Data transmitted to another controller without hindrance from us, where the processing is based either on the Data Subject's consent or on a contract;

v. 以結構化、常用及機器可讀之格式接收其向我們提供的有關個人資料，並將該等個人資料傳輸給另一個控制者（不受我們妨礙），如該等處理係基於資料主體之同意或合約；

vi. lodge a complaint in relation to data protection issues with the relevant data protection authorities in the member state of the European Economic Area where the Data Subject lives or works, or where the alleged infringement of the GDPR or of the Luxembourg law of 1 August 2018 occurred. In Luxembourg, the competent authority is the Luxembourg data protection authority, the Commission Nationale de la Protection des Données, with its address at 15, Boulevard du Jazz L-4370 Belvaux (Tel.: (+352) 26 10 60-1 <https://cnpd.public.lu/en/droits/faire-valoir/formulaire-plainte.html>);

vi. 向資料主體居住或工作之歐洲經濟區成員國或涉嫌違反 GDPR 或 2018 年 8 月 1 日盧森堡法律之侵權行為發生地點之相關資料保護機構提出有關資料保護問題之申訴。於盧森堡，主管機關係盧森堡資料保護機構—Commission Nationale de la Protection des Données，地址為 15, Boulevard du Jazz L-4370 Belvaux（電話：(+352) 26 10 60-1 <https://cnpd.public.lu/en/droits/faire-valoir/formulaire-plainte.html>）；

vii. withdraw his/her consent at any time (without this withdrawal affecting the lawfulness of processing prior to the withdrawal) in cases where his/her Personal Data has been processed on the legal basis of consent;

vii. 若其個人資料係於合法同意之基礎上處理者，則可隨時撤回其同意（撤回不會影響撤回之前的處理之合法性）；

viii. object to the processing of his/her Personal Data, at any time and free of charge, where we are relying on a legitimate interest (or that of a third party) and there is something about the Data Subject's particular situation which makes the Data Subject want to object to processing on this ground. The Data Subject also has the right to

(本中譯本之內容與英文版本若有歧異，以英文版本之內容為準。)

object where we are processing his/her Personal Data for direct marketing purposes.

viii. 若我們依據合法利益（或第三方之利益），然而資料主體之特殊情況使資料主體擬以此為由拒絕處理，則可以隨時及免費拒絕處理其個人資料。資料主體亦有權反對我們出於直接行銷目的而處理其個人資料。

To exercise these rights, to withdraw his/her consent, to object to the processing of his/her Personal Data or for any other data protection queries, the Data Subject can contact the Company's Data Protection Officer or the relevant Distributor.

若要行使這些權利、撤回同意、反對處理其個人資料或提出任何其他資料保護疑問，則資料主體可以聯絡本公司的資料保護長或相關經銷商。

## 9. Miscellaneous

### 9. 雜項

If a Data Subject fails to provide such information in a form which is satisfactory to the Company, opposes the aforementioned processing of his/her Personal Data or withdraws his/her consent to such data processing, the Company may restrict or prevent any business relationship with the Data Subject.

若資料主體未能以符合本公司要求之形式提供此類資訊、反對對其個人資料進行上述處理、或撤回其對此類資料處理之同意，則本公司得限制或禁止資料主體與本公司間之任何業務關係。

## **Manulife Global Fund**

Société d'investissement à capital variable

Registered office: 31, Z.A. Bourmicht, L-8070 Bertrange

Grand Duchy of Luxembourg

**(the “Company”)**

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Luxembourg, 5 October 2023

Please be informed that your Personal Data (as defined below) may be collected, recorded, stored in digital form or otherwise, adapted, transferred or otherwise processed and used in accordance with the law of 1 August 2018 on the organization of the National Data Protection Commission and the implementation of the GDPR, the European Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation or “GDPR”) and any other European Union or national legislation which implements or supplements the foregoing.

In this privacy notice, references to “we”, “us” or “our” are references to the Company, acting as controller with respect to the Personal Data.

This privacy notice applies to you and to any third parties whose information you provide to us in connection with our relationship with you, such as your authorized representatives or beneficial owners (the natural persons whose Personal Data we process being referred to as “Data Subjects”). Please ensure that a copy of this privacy notice is provided to any third parties whose Personal Data (as defined below) you provide to us. You also confirm that you have obtained the valid consent from third parties whose information you provide to us (in connection with your investment in the Company) for the collection and processing of their personal data in accordance with the Privacy Notice, where applicable. We may update this privacy notice from time to time and we will notify you in writing of any changes we make. Please also ensure that any Data Subjects whose information you provide to us in connection with our relationship with you are notified of such updates. If you have any questions concerning this Privacy Notice, please contact our Data Protection Officer at Manulife Investment Management (Ireland) Limited whose registered address

is at Second Floor, 5 Earlsfort Terrace, Dublin D02 CK83, Ireland, [dpo\\_europe@manulifeam.com](mailto:dpo_europe@manulifeam.com).

You, as a Data Subject, remain responsible to inform any of your potential authorised representatives or beneficial owners about the existence and content of this privacy notice.

## 1. Which categories of Personal Data are concerned?

“Personal Data” includes data regarding an individual’s identification such as name and first name, date of birth, place of residence, fiscal domicile, address, nationality, telephone number, email address, bank account details, tax number and copies of ID or passport. For the avoidance of doubt, in case of investors which are companies, Personal Data includes personal data of individuals linked to such companies.

## 2. Where do we obtain Personal Data about you?

Personal Data may be collected, used and stored by us from the following sources:

- i. information provided verbally, electronically or in writing, including information provided on subscription forms, questionnaires, websites and other forms provided by Data Subjects or the company to which they are linked;
- ii. information that is generated in the course of the business of the Company as an investment company which qualifies as an undertaking for collective investment in transferable securities (UCITS);
- iii. information obtained from international sanctions lists, publicly available websites, financial market infrastructures (including settlement service providers, central securities depositaries, exchanges, central clearing counterparties and other similar entities) and other public data sources;

- iv. the performance of contracts that may be entered into by the Company with Data Subjects, the companies they are linked to or third parties (as described below) from time to time;
- v. the use of products and services and your relationship with us, as well as with our affiliates, including members of the Manulife Group (being Manulife Financial Corporation and its subsidiaries and affiliates); and
- vi. information that may be received from third parties, being:
  - a. Manulife Investment Management (Ireland) Limited acting as the management company of the Company;
  - b. the following distributor and sub-distributors (collectively “Distributors” and each a “Distributor”):
    - Manulife Investment Management (Ireland) Limited (the “General Distributor”)
    - Manulife Investment Management (Hong Kong) Limited
    - Manulife Investment Management (Singapore) Pte. Ltd.
    - Manulife Investment Management (Taiwan) Co., Limited
    - Manulife Investment Management (US) LLC
    - Manulife Investment Management (Ireland) Limited
  - c. Citibank Europe plc, Luxembourg Branch acting as the administrator, registrar and paying agent of the Company (the “Administrator, Registrar and Paying Agent”); and
  - d. Manulife Investment Management (Hong Kong) Limited acting as platform administration services provider in respect of the Company.

### 3. Why do we process your Personal Data?

The Personal Data will be processed by us and/or on our behalf (including by the above-mentioned third parties) if necessary for the purposes of:

- i. performance of contracts, including:



- a. processing subscription, redemption and switching orders for shares in the Company;
  - b. payments of dividends and other distributions to shareholders;
  - c. maintaining the register of shareholders of the Company;
  - d. account and distribution fees administration;
  - e. cash movements for transactions settlement purposes;
  - f. calculation and payment of trailer fees remuneration; and
  - g. reconciliation of cash accounts;
- ii. compliance with applicable legal and regulatory obligations which the Company is subject to, such as in relation to:
  - a. anti-money laundering and terrorism financing;
  - b. know your client (KYC) obligations;
  - c. crime detection, prevention, investigation and prosecution;
  - d. tax identification in accordance with applicable legal obligations, including pursuant to the U.S. Foreign Account Tax Compliance Act ("FATCA") and the Organisation for Economic Co-operation and Development's Common Reporting Standard for the Automatic Exchange of Information ("CRS") and any relevant regulations in connection therewith; and
  - e. any applicable supervisory requirements.
- iii. the legitimate interest of the Company (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms):
  - a. assessing and managing risk (in order to determine and manage levels of risk to which the Company is exposed);
  - b. monitoring and recording of calls and electronic communications for quality, security, training, investigation and fraud prevention purposes (to improve the quality of the Company's services and products, ensure the

security of the Company and its business, and detect and protect against fraud); and

c. production of quality and activity reports (to improve the Company's services and products).

We may also rely on consent as a legal basis for processing of the Data Subject's Personal Data. If consent is relied on, it will be made clear to the Data Subject at the time his/her consent is asked for. The Data Subject will have the right to withdraw such consent at any time.

## 4. To whom do we disclose your Personal Data?

Generally, we will not provide Personal Data to outside firms, organisations or individuals, unless it is required in the normal course of business, or as otherwise permitted or required by law, or on request from an applicable regulator.

We may disclose certain Personal Data, on a "need to know" basis:

- i. to Manulife Investment Management (Ireland) Limited acting as the management company of the Company;
- ii. to Citibank Europe plc, Luxembourg Branch acting as the Administrator, Registrar and Paying Agent of the Company;
- iii. to Citibank Europe plc, Luxembourg Branch acting as the depositary of the Company;
- iv. to any Distributor;
- v. to any member of the Manulife Group in connection with any internal risk, compliance and reporting and/or administrative services processes and policies, in particular Manulife Financial Corporation, Manulife Investment Management (US) LLC, Manulife Investment Management (Hong Kong) Limited and Manulife Investment Management (M) Berhad;

- vi. to any bank or other party with whom the Company conducts or intends to conduct business that has requested such information;
- vii. to the government of Luxembourg (or to other foreign fiscal or tax authorities, as applicable) as well as to other public authorities (including supervisory or regulatory authorities) in order to comply with any applicable Luxembourg law and the obligation of the Luxembourg government (or other foreign fiscal or tax authorities, as applicable) to automatically exchange information as outlined above, and for the avoidance of doubt, including to any other governmental or regulatory authority, including tax authorities, in the European Economic Area, in any country which is a participating jurisdiction from time to time under CRS or in the United States of America;
- viii. to any competent regulatory, prosecuting, tax or governmental authority having jurisdiction over us or our affiliates or any regulatory authority that requests such information in connection with any proposed investment or disposition of an investment;
- ix. in connection with any litigation or other dispute or otherwise as necessary or appropriate to enforce the interests of the Company;
- x. to our, our affiliates' or the above-mentioned third parties' directors, officers, employees, agents, administrators, attorneys, legal and tax advisors, accountants or other professional service providers (including administrative support providers and processors);
- xi. to other persons as required by any law, rule or regulation or in response to any legal process; and
- xii. otherwise as the Company deems reasonably necessary for the conduct of the Company's business.

Access to Personal Data is restricted to those employees who need to know that information to provide services to the Company and its investors. We will require third party service providers to protect the confidentiality and privacy of your Personal Data and to use the information only for the purpose for which the disclosure is made. For this purpose, service providers receiving Personal Data are bound by agreement with us to keep Personal Data secure.

## 5. Where do we transfer your Personal Data?

Processing Personal Data for the purposes mentioned above may involve the transfer of Personal Data to third parties located outside the European Union, in countries where data protection laws might not exist or be of a lower or different standard than in the European Union, including the United States, India and Hong Kong.

We and any service provider acting on our behalf will ensure that a transfer of your Personal Data to these countries is carried out in compliance with the GDPR. Suitable safeguards are put in place ensuring that such transfer is carried out in compliance with the GDPR. A copy of such safeguards can be requested from the Company's Data Protection Officer or the relevant Distributor.

Your Personal Data will be transferred to the United States, India and Hong Kong based on standard data protection clauses adopted by the European Commission.

## 6. How long do we keep your Personal Data?

We will collect only such information that is useful and required for the performance of the services we provide to you. Any Personal Data may be held for a period of up to 10 years after the termination of the relationship between you and the Company and in any event no longer than necessary with regard to the purpose of the data processing or as required by law.

## 7. Who is responsible for your Personal Data?

The Company, acting in its capacity as data controller in relation to your Personal Data, will be responsible for the lawful processing of your Personal Data.

We ensure the confidentiality, privacy and security of your Personal Data. Physical, electronic and procedural safeguards are maintained to protect any Personal Data.

## 8. What are the Data Subject's rights in relation to Personal Data?

Under certain circumstances, the Data Subject has the right, in accordance with the GDPR, to:

- i. request access to his/her Personal Data and to request a copy of the Personal Data processed by or on behalf of the Company free of charge or subject to an administrative charge if the Data Subject's request is excessive or manifestly unfounded. This enables the Data Subject to receive a copy of the Personal Data we hold about him/her and to check that we are lawfully processing it;
- ii. request the rectification of his/her Personal Data in case of inaccuracy or incompleteness. This enables the Data Subject to have any incomplete or inaccurate information we hold about him/her corrected;
- iii. request the erasure of his/her Personal Data. This enables the Data Subject to ask us to delete or remove Personal Data where the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed. The Data Subject also has the right to ask us to delete or remove his/her Personal Data where the Data Subject has exercised his/her right to object to processing;
- iv. request the restriction of the processing of his/her Personal Data. This enables the Data Subject to ask us to suspend the processing of Personal Data about him/her, for example if the Data Subject wants us to establish its accuracy;
- v. receive the Personal Data concerning him/her, which he/she has provided to us, in a structured, commonly used and machine-readable format and have those Personal Data transmitted to another controller without hindrance from us, where the processing is based either on the Data Subject's consent or on a contract;
- vi. lodge a complaint in relation to data protection issues with the relevant data protection authorities in the member state of the European Economic Area where the Data Subject lives or works, or where the alleged infringement of the GDPR or of the Luxembourg law of 1 August 2018 occurred. In Luxembourg, the competent authority is the Luxembourg data protection authority, the Commission Nationale de la Protection des Données, with its address at 15, Boulevard du Jazz

L-4370 Belvaux (Tel.: (+352) 26 10 60-1 <https://cnpd.public.lu/en/droits/faire-valoir/formulaire-plainte.html>);

vii. withdraw his/her consent at any time (without this withdrawal affecting the lawfulness of processing prior to the withdrawal) in cases where his/her Personal Data has been processed on the legal basis of consent;

viii. object to the processing of his/her Personal Data, at any time and free of charge, where we are relying on a legitimate interest (or that of a third party) and there is something about the Data Subject's particular situation which makes the Data Subject want to object to processing on this ground. The Data Subject also has the right to object where we are processing his/her Personal Data for direct marketing purposes.

To exercise these rights, to withdraw his/her consent, to object to the processing of his/her Personal Data or for any other data protection queries, the Data Subject can contact the Company's Data Protection Officer or the relevant Distributor.

## 9. Miscellaneous

If a Data Subject fails to provide such information in a form which is satisfactory to the Company, opposes the aforementioned processing of his/her Personal Data or withdraws his/her consent to such data processing, the Company may restrict or prevent any business relationship with the Data Subject.