

Momentum Global Investment Management (MGIM) has issued this Privacy Policy in accordance with the provisions of the Data Protection Act 1998 and the European General Data Protection Regulation 2016/679 ('GDPR') which became effective from 25th May 2018 relating to your personal information ('Personal Data'). This Privacy Policy deals with personal information relating to investors in investment funds received by MGIM.

This Policy explains how we use the personal information we may collect from you, or is provided to us about you or you provide to us when you use our website, visit our offices, enter into a legal contract with us, make use of our products or receive marketing information from us.

We process personal data that we obtain in the context of our business relationship. We also process personal data insofar as necessary to provide our services to you.

We take the privacy of your information seriously and we ask that you read this Privacy Policy carefully as it contains important information on:

- » the personal information we collect about you
- » what we do with your information,
- » who your information might be shared with,
- » how long we retain this information, and
- » what your legal rights are regarding your personal information.

In this document, 'we', 'us' and 'our' refer to MGIM, its subsidiaries, associated and affiliated companies and is addressed to investors in investment funds (hereafter 'you').

This Policy deals with how we manage Personal Data which we receive as Data Processor from the under-mentioned investment funds (acting as data controllers):

- » Momentum Managed Funds SICAV-SIF
- » Momentum Investment Funds SICAV-SIF
- » Momentum Global Funds
- » Momentum Private Equity SICAV-SIF
- » Momentum Private Equity Feeder Fund SICAV-SIF
- » MI Momentum Investment Funds
- » Momentum Mutual Fund IC Limited

This Policy may be amended from time to time to reflect changes in our practices regarding the Processing of Personal Data, or changes in applicable law. We reserve the right to amend this Policy at any time without having to obtain your prior consent to such changes. For your assistance we have provided an entry on the Policy of the latest date that it was revised. We urge you to read this Policy carefully, and to review it periodically for changes.

The Data Processor

Momentum Global Investment Management (MGIM) is a data processor of Personal Data that you or the entity that you represent provides to us about you.

Company Registration No:	03733094
Registered office:	The Rex Building, 62 Queen Street, London EC4R 1EB
Telephone:	+44 (0) 207 489 7223
Email:	distributionservices@momentum.co.uk
Websites:	https://www.momentumgim.co.uk and http://harmonyportfolios.com/
LinkedIn:	https://www.linkedin.com/company/momentumglobalinvestmentmanagement/

1. Personal data we process

We process personal data that we obtain from you in the context as Investment Manager and/or Global Distributor of the investment funds listed above.

This includes information relating to you and/or any individuals connected with you as an investor in the Company namely (this list is not intended to be exhaustive): first name, second and other names, last name, previous name, gender, date of birth, place of birth, nationality, passport number, citizenship, address residence, address correspondence, identity card with photo, proof of address, bank account data, IBAN and BIC codes, purpose of investment, source of wealth, profession, income, tax identifiers, tax status, tax certificates, power of attorney status, joint holders, related parties, beneficial owners, sanctions status, PEP status, previous contact details and addresses, telephone number, mobile number, email address, salutation, contact preferences, base currency preferences, language preferences, interested parties.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

The types of information we collect from you automatically may include: opening of emails, date and time emails were opened, links clicked on within emails and if emails are forwarded.

We and our website service provider may use a variety of technologies, including cookies and similar technologies, to assist in collecting this information.

2. The reasons we process your data

We may collect your personal information for the following purposes:

- i. Assisting the relevant investment fund Board of Directors in compliance with legal obligations such as the performance of the customer due diligence duties under the Luxembourg law of 12 November 2004 against money laundering and terrorism financing, as amended, the anti-money laundering identification, in our role as Global Distributor of certain of the investment funds.
- ii. account and distribution fee administration,
- iii. to reply to your questions about subscriptions, redemptions and commission payments;
- iv. to reply to questions concerning your tax identification under applicable regulation such as the Foreign Account Tax Compliance provisions of the U.S. Hiring Incentives to Restore Employment Act enacted in March 2010 and the Luxembourg law of 18 December 2015 on the Common Reporting Standard (vi) providing or procuring the services, amongst others, relating to depositaries,
- v. to provide you with and /or administer the products and services you request.
- vi. to record your interactions with us in order to monitor and improve our customer service standards and our relationship with you.

3. Legal basis for using your information

In addition to where we use your information to satisfy a legal obligation, if you make an enquiry, ask a question or request information on a service or product, or report a problem, we will rely on a lawful basis of processing, such as legitimate interest, performance of a contract, your consent freely given or our compliance with legal obligations, before we use your information.

4. Disclosure of personal data to third parties

Because of the international nature of our business, we may need to transfer your Personal Data outside the EU to companies within the MMI Holdings Limited group of companies and to third parties. In these cases, we will ensure that such transfers take place in accordance with applicable data protection laws and regulations. You can obtain further information regarding the mechanisms used to safeguard your data by contacting our Distribution Services Team at the contact details listed above. We are committed to keeping the data you provide us secure and have implemented appropriate technical and organisational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.

All MGIM employees and data processors (i.e. those who process your personal data on our behalf, for the purposes listed in Section 2), who have access to, and are associated with the processing of your personal data, are obliged to comply with safeguards to ensure the continued confidentiality and security of your information, and not to use it for any other purpose than to carry out the services that are being performed for you.

You are responsible for ensuring that any Personal Data that you send to us is sent securely.

5. Keeping your information

We will only keep your personal data for as long as we believe it necessary in order to fulfil the purposes for which it was collected, as set out in this Privacy Policy, and for as long as we are required to keep it by law and in order to fulfil our legal obligations and rights.

When determining the relevant retention periods, we will take into account factors including:

- » our contractual and business relationships with you;
- » legal obligations under applicable law to retain data for a certain period of time;
- » statute of limitations under applicable law(s);
- » the likelihood of disputes arising;
- » guidelines issued by relevant supervisory authorities; and
- » additional internal safeguards and restrictions placed on access to your Personal Data.

6. Links to other websites

Our website(s) may provide links to other third party websites. These links are provided for your convenience only and you should be aware that the information handling practices of the linked websites might not be the same as ours. You should review any privacy notices on those linked websites. MGIM is not responsible for the privacy policies or practices or the content of such external links.

7. Your privacy rights

You have several rights with respect to your information which are summarised below. More information on these rights can be found on the Information Commissioner's website: www.ico.org.uk

1. The right to access the personal data that we hold about you.
 2. The right to make us correct any inaccurate personal data we hold about you
 3. The right to make us erase any personal data we hold about you. This right will only apply where for example): we no longer need
 - » to use the personal data to achieve the purpose we collected it for;
 - » you withdraw your consent if we're using your personal data based on that consent; or
 - » where you object to the way we use your data, and there is no overriding legitimate interest
 4. The right to restrict our processing of the personal data we hold about you. This right will only apply where for example:
 - » you dispute the accuracy of the personal data we hold;
 - » you would like your data erased, but we require to hold it in order to stop its processing;
 - » you have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or
 - » where we no longer need to use the personal data to achieve the purpose we collected it for, but you need the data for legal claims.
 5. The right to object to our processing of personal data we hold about you (including for the purposes of sending marketing materials to you).
 6. The right to receive personal data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to make us transfer this personal data to another organisation.
 7. The right to withdraw your consent, where we're relying on it to use your personal data (for example, to provide you with marketing information about our services or products).
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8. If you would like to exercise any of your rights mentioned above, you can do so by contacting our Distribution Services Team using the details in the 'The Data Controller' section.

If you have any concerns about the way we process your personal data, or are not happy with the way we've handled a request by you in relation to your rights, you also have the right to make a complaint to the Information Commissioner's Office. Their address is:

First Contact Team
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF
Telephone: 0303 123 1113 or 01625 545745
Fax: 01625 524510

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