

# Privacy Notice – Clients, Prospective Clients, Business Partners, Investors and Vendor Services

## Introduction

Climate Fund Managers B.V., each of its direct or indirect subsidiaries, its affiliated entities and CFM managed products (collectively, “**CFM**” “**we**”, “**us**” or “**our**”) is committed to safeguarding Personal Data and Processing Personal Data in line with applicable privacy and data protection laws. CFM functions, as the entity you contract with, as the controller of your Personal Data.

This Privacy Notice sets out the purposes for which we collect, use, and disclose (collectively “**Processing**”/ “**Processed**”/ “**Process**”) certain information relating to an identified or identifiable natural person (“**Personal Data**”), and how it is protected. It also sets out individuals’ rights in relation to the Processing of their Personal Data.

There may be additional terms, conditions and commitments that also govern how we collect, use and disclose your Personal Data, which should be read in conjunction with this Privacy Notice.

In this Privacy Notice you will find the following information:

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## What Personal Data do we process

The nature of the Personal Data that we collect will depend on the services provided, applicable laws and our relationship with you. The following is a non-exhaustive list of the Personal Data we collect:

- **Identification Data**  
Full name, title, gender, marital status, date of birth, passport number, driving license number, national identification number, signature
- **Contact Data**  
Personal address, telephone number, email address
- **Electronic Monitoring Data**  
To the extent permitted by law, we may record and monitor your electronic communications with us, including telephone conversations, emails, instant messaging and any other electronic communications
- **Financial Data**  
Account number, client reference number, account statements, investment history
- **Marketing and Communications Data**  
Marketing and communication preferences; information about your use of our websites, our portals and platforms as explained below in relation to cookies
- **Professional Information Data**

Position/job title, business address, business telephone number business email address

- **Profile Data**

Investments made by you, services requested, marketing communications responded to

- **Services Data**

Payment details to and from you, details of services you have provided to us, or we have provided to you

- **Special Personal Data**

In limited circumstances we may collect information about criminal convictions and offences, when legally required; dietary requirements, if we are arranging catering; disability, to make reasonable accommodations for you in our buildings; political affiliations, for us to determine whether you are a politically exposed person

- **Technical Data**

Your use of and interaction with our online services, your IP address browser type and version, browser plug in types and versions operating system

## How do we collect your Personal Data

We will collect Personal Data for specified, explicit and legitimate purposes only and we will not process data that is not necessary in relation to these purposes.

We may collect Personal Data in several ways, including:

- Directly from you
- If you are representative of an organization or entity that is a client or vendor of CFM, and that organization or entity provides us with your Personal Data
- From publicly available sources or the corporate website of the organization you are working for

## Purpose and legal basis for Processing your Personal Data

The below table sets out the purposes and basis for which we Process your Personal Data and the legal bases for these activities, grouped by data subject categories:

**For Clients, Prospective Clients, Business Partners and Investors:**

<b>Processing Purpose</b>	<b>Category of Personal Data</b>	<b>Basis of Processing</b>
Provision of our services & administration thereof	<ul style="list-style-type: none"> <li>▪ Identification data</li> <li>▪ Contact data</li> <li>▪ Financial data</li> <li>▪ Services data</li> <li>▪ Technical Data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Complying with legal obligation</li> <li>▪ Necessary for performance of contract, in this case the Processing of your Personal data may be a requirement necessary to enter into a contract, failure to provide the Personal Data could result in us not being able to process your contract</li> </ul>
Promotion of ideas and events relating to services we provide.	<ul style="list-style-type: none"> <li>▪ Contact data</li> <li>▪ Profile data</li> <li>▪ Technical data</li> <li>▪ Marketing and Communications data</li> <li>▪ Professional Information data</li> <li>▪ Technical Data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Consent</li> <li>▪ Legitimate interests: ensuring our client records are up to date, promoting our client services, receiving feedback, improving our services, identifying ways to expand our business</li> </ul>
Accuracy of client records	<ul style="list-style-type: none"> <li>▪ Identification data</li> <li>▪ Contact data</li> <li>▪ Financial data</li> <li>▪ Services data</li> <li>▪ Special Personal Information</li> <li>▪ Technical Data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Complying with legal obligation</li> <li>▪ Special Personal Data is processed based on explicit consent</li> <li>▪ Necessary for performance of contract</li> </ul>
Maintenance of records of communications and management of our business relationship	<ul style="list-style-type: none"> <li>▪ Identification data</li> <li>▪ Contact data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Performance of a contract</li> <li>▪ Legal or regulatory obligation</li> </ul>

	<ul style="list-style-type: none"> <li>▪ Marketing and Communications data</li> <li>▪ Financial data</li> <li>▪ Electronic Monitoring data</li> <li>▪ Professional Information data</li> <li>▪ Services data</li> </ul>	<p>Legitimate interests: ensuring we can notify you about changes to our terms of business or this Privacy Notice</p>
<p>Performing anti-money laundering, anti-terrorism, sanction screening, fraud, KYC and other due diligence checks</p>	<ul style="list-style-type: none"> <li>▪ Identification data</li> <li>▪ Contact data</li> <li>▪ Financial data</li> <li>▪ Electronic Monitoring Data</li> <li>▪ Professional Information data</li> <li>▪ Services data</li> <li>▪ Special Personal Information</li> <li>▪ Technical Data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Performance of a contract</li> <li>▪ Legal or regulatory obligations</li> <li>▪ Legitimate interests: ensuring we do not accept the proceeds of criminal activities or assist in fraudulent or any unlawful activities, such as terrorism</li> </ul>
<p>Prevention and detection of fraud and other illegal activity or misconduct</p>	<ul style="list-style-type: none"> <li>▪ Identification data</li> <li>▪ Contact data</li> <li>▪ Financial data</li> <li>▪ Services data</li> <li>▪ Electronic Monitoring Data</li> <li>▪ Professional Information data</li> <li>▪ Technical Data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Legal or regulatory obligation</li> <li>▪ Public interest</li> <li>▪ Legitimate interests: protecting client assets, detecting, and protecting against breaches of our policies and applicable laws protecting employees</li> </ul>
<p>Communication, such as direct marketing, informing clients, reporting requirements, etc.</p>	<ul style="list-style-type: none"> <li>▪ Identification data</li> <li>▪ Contact data</li> <li>▪ Financial data</li> <li>▪ Marketing and Communications data</li> <li>▪ Services data</li> <li>▪ Technical Data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Legitimate interests: identifying ways to improve and expand our business, and keeping client informed</li> <li>▪ Necessary for performance of contract, in this case the Processing of your Personal data may be a requirement necessary to enter into a contract, failure to provide the Personal Data could result in us not being able to process your contract</li> </ul>

To manage payments, fees, and charges and to collect and recover money owed to us.	<ul style="list-style-type: none"> <li>▪ Identification data</li> <li>▪ Contact data</li> <li>▪ Financial data</li> <li>▪ Services data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Performance of a contract</li> <li>▪ Legitimate interests: ensuring we can manage payments, fees and charges and to collect and recover money owed to us</li> </ul>
To interact with governmental or regulatory bodies or other competent national authorities	<ul style="list-style-type: none"> <li>▪ Identification data</li> <li>▪ Contact data</li> <li>▪ Financial data</li> <li>▪ Services data</li> <li>▪ Professional information data</li> <li>▪ Electronic Monitoring data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Legal or regulatory obligation</li> <li>▪ Public interest</li> </ul>
To manage and protect our business, including improving data security, troubleshooting data and systems, system maintenance and testing, data hosting, managing our offices and other facilities	<ul style="list-style-type: none"> <li>▪ Contact data</li> <li>▪ Identification data</li> <li>▪ Electronic Monitoring data</li> <li>▪ Profile data</li> <li>▪ Technical data</li> <li>▪ Marketing and Communications data</li> <li>▪ Professional Information data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Legal or regulatory obligation</li> <li>▪ Legitimate interests: ensuring the efficient and secure running of our business, including through office and facilities administration, maintaining information technology services, network and data security and fraud prevention</li> </ul>

**In relation to vendor services:**

<b>Processing Purpose</b>	<b>Category of PI</b>	<b>Basis of Processing</b>
To engage you or the organization or entity you work for as a new supplier, including performing anti-money laundering, anti-terrorism, sanctions, fraud, and other background checks	<ul style="list-style-type: none"> <li>▪ Identification Data</li> <li>▪ Contact Data</li> <li>▪ Electronic Monitoring Data</li> <li>▪ Financial Data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Performance of a contract</li> <li>▪ Complying with legal or regulatory obligation</li> </ul>

	<ul style="list-style-type: none"> <li>▪ Identification Data</li> <li>▪ Professional Information Data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Legitimate interests: ensuring we do not deal with proceeds of criminal activities or assist in any other unlawful or fraudulent activities for example terrorism</li> </ul>
To manage payments, fees, and charges and to collect and recover money owed to us	<ul style="list-style-type: none"> <li>▪ Identification data</li> <li>▪ Contact data</li> <li>▪ Financial data</li> <li>▪ Professional Information data</li> <li>▪ Services data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Performance of a contract</li> <li>▪ Legitimate interests: ensuring we can manage payments, fees, and charges; to collect and recover money owed</li> </ul>
Where we provide you access to our systems we need to manage and protect our business, including improving data security, troubleshooting data and systems, system maintenance and testing, and data hosting	<ul style="list-style-type: none"> <li>▪ Identification Data</li> <li>▪ Contact data</li> <li>▪ Profile data</li> <li>▪ Technical data</li> </ul>	<ul style="list-style-type: none"> <li>▪ Legal or regulatory obligation</li> <li>▪ Legitimate interests: ensuring the efficient and secure running of our business, including maintaining information technology services, network, and data security</li> </ul>

## With whom do we share your Personal Data

We take appropriate measures to ensure that the Personal Data will be properly Processed in accordance with applicable rules and regulations. When required, Personal Data may also be shared with competent authorities and/or specific CFM advisors (e.g. Depositary Service Provider), within the scope of the purposes explained in the data request. In respect of one or more of the purposes outlined above, we may disclose Personal Data in any jurisdiction to:

- Professional advisors, third parties, agents or independent contractors that provide services to CFM (such as IT systems providers, platform providers, financial advisors, brokers, consultants (including lawyers and accountants))
- Goods and services providers (such as providers of marketing services where we are permitted to disclose your Personal Data to them), intermediaries, brokers, and other individuals and entities that partner with us
- Intra-group to related affiliates also working on providing you with related services;
- Law enforcement agencies; financial regulators and other relevant regulatory authorities; government bodies; tax authorities; courts tribunals and complaints/dispute resolution bodies where CFM is required or allowed to do disclose Personal Data;

- Other bodies as required by law or regulation;
- Financial institutions such as trustees, custodians and sub-custodians; insurers; fraud protection agencies; and/or similar suppliers or service providers; and
- Any person to whom disclosure is allowed or required by local or foreign law, regulation, or any other applicable instrument.

We will ensure that, where relevant, contractual safeguards are implemented to ensure the protection of your Personal Data when disclosing your Personal Data to a third party. For example, we have entered or will enter into data processing agreements with relevant parties (providing for restrictions on the use of your Personal Data and obligations with respect to the protection and security of your Personal Data).

When we share your Personal Data as set out above with other parties located in countries outside the EEA, these countries may offer a lower level of data protection than in the Netherlands. In such case, it shall be ensured that adequate measures are taken to ensure adequate protection of your Personal Data in accordance with applicable data protection legislation on the basis of Standard Contractual Clauses, as drafted by the European Commission. You have the right to request more information on this by contacting us using the details set out at the bottom of this Privacy Notice.

## How We Protect Your Data

CFM uses a range of measures to ensure the appropriate level of security to Process Personal Data.

Our staff are aware of CFM's privacy obligations when Processing Personal Data and receives training around phishing and password risks. Staff are obliged to handle this information with care and prevent business-critical, privacy-sensitive, or other confidential information from being accessible to unauthorised persons. Specifically, our staff must abide by the following general guidelines in respect of handling sensitive information or any information that CFM has not disclosed or made generally available to the public:

- not make unauthorised disclosures of confidential information or use it for purposes other than those for which it was disclosed except as required by law
- comply with the requirements imposed by a confidentiality agreement or undertaking, imposed by law, or as specified in internal policies, procedures, or rules
- where confidential information is to be provided to another party, ensure that measures are in place to maintain the confidentiality of that information, such as a legally binding confidentiality agreement
- take the appropriate care in handling such information and where a staff member gains access to potentially sensitive information that their manager is not aware of, they must notify them.



CFM employs various security measures to protect Personal Data, including:

- administrative and technical controls to restrict access to Personal Data
- technological security measures, such as firewalls, encryption, and antivirus software
- physical security measures, like building access controls
- external assessments, including security audits and vendor due diligence
- comprehensive cybersecurity defenses, real-time monitoring, and incident management

The security of data transmitted over the internet (including by e-mail) cannot be guaranteed and carries the risk of access and interception. You should not send us any Personal Data by open/unsecure channels over the internet. We endeavour to protect Personal Data but cannot guarantee the security of data transmitted to us or by us.

## How long do we store your Personal data

We will Process your Personal Data for as long as is necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory, accounting, reporting or internal policy requirements but your Personal Data will not be kept on record for longer than required.

## What are your rights and how you can exercise them

In accordance with the conditions and limitations laid down by the Data Protection Laws, you have the right to:

### **Access your Personal Data**

To obtain confirmation as to whether or not Personal Data concerning you are being Processed, how it is being Processed and, where that is the case, access to such Personal Data.

### **Rectify your Personal Data**

To obtain, without undue delay, the rectification of your inaccurate or incomplete Personal Data.

### **Object to the Processing of your Personal Data**

To object, on grounds relating to your particular situation, at any time to Processing of Personal Data concerning you which is based on the performance of a task carried out in the public interest or the legitimate interests pursued by us or by a third party. We will

no longer Process the Personal Data unless we demonstrate compelling legitimate grounds for the Processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. You always have the right to object to direct marketing. In each communication, you will find an unsubscribe button.

**Restrict the use of your Personal Data**

To request that CFM restricts the way it Processes your Personal Data in some circumstances.

Where Processing has been restricted under the above paragraph, such Personal Data shall, with the exception of storage, only be Processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.

**Have your Personal Data erased**

To request deletion of your Personal Data without undue delay where CFM does not have a legal obligation or other valid reason to continue Processing it.

**Withdraw your consent**

To withdraw your consent easily and at any time. The withdrawal of consent shall not affect the lawfulness of Processing based on consent before its withdrawal.

**Ask for Personal Data portability**

To receive the Personal Data concerning you in a structured, commonly used and machine-readable format and to have your Personal Data transmitted to another organization in some circumstances.

You may exercise your rights at any time by contacting us using the details set out at the bottom of this Privacy Notice. We will respond to your request without undue delay and at least within the time period stipulated in applicable law.

## Automated decision-making, including profiling

We do not engage in automated decision-making or profiling.

## Changes to this Privacy Statement

From time to time, we may need to change this Privacy Notice. The most recent version of this Privacy Notice is available on our website. We will inform you in case of material changes to our Privacy Notice.

## Contact

For privacy-related inquiries or to exercise your rights, please contact:

- Email: [governance@climatefundmanagers.com](mailto:governance@climatefundmanagers.com)
- Phone: +31 (0)70 204 5205
- Address: Korte Vijverberg 4, 2513 AB, The Hague, The Netherlands

## Complaints

You have the right to lodge a complaint with the Dutch Data Protection Authority. For more information, visit the Dutch DPA website.