

Data protection information in accordance with the EU General Data Protection Regulation for authorised representatives/agents of “legal persons”

The following information gives you an overview of the way in which we process your personal data and your rights under data protection law. The specific types of data processed, and how they are processed, are explained below.

Please also pass on the information to current and future authorised representatives and economic beneficiaries. This includes, for example, beneficiaries in the event of death or authorised signatories.

1. Who is responsible for data processing and whom should I contact

The responsible entity is:

DWS Investment S.A., Luxembourg
Postfach 766
L-2017 Luxembourg
Telephone: +352 42101-860
Fax: +352 42101-900
Email address: dws.lu@db.com

Our data protection officers may be contacted at:

DWS Investment S.A., Luxembourg
Data Protection Officers
Postfach 766
L-2017 Luxembourg
Telephone: +352 42101-860
Email address: dws.lu@db.com

2. What sources and what data do we use

We process personal data that we obtain from you in your role as representative/agent of the legal person (prospect and/or client). We also process personal information we have obtained on an authorised basis from publicly accessible sources (e.g. register of companies and associations, press, media, internet) and which we are authorised to process.

Relevant personal data for the authorised representative/agent can include:

Name, address/other contact details (telephone, email address), date/place of birth, gender, nationality, marital status, legal capacity, employed/self-employed, identification data (e.g. ID card data), authentication data (e.g. specimen signature), tax ID.

In addition to the aforementioned data, additional personal data may be collected, processed and stored in connection with the conclusion of agreements and use of products/services. This primarily includes:

Information regarding knowledge and/or experience with securities, interest rate and currency products/financial investments (MiFID status: suitability assessment) and recording thereof.

3. Why do we process your data (purpose of processing) and on what legal basis

We process the aforementioned personal data in accordance with the EU General Data Protection Regulation (GDPR), German Federal Data Protection Act (*Bundesdatenschutzgesetz* – BDSG) and Luxembourg Data Protection Law:

a. For the performance of contractual duties (Art. 6 paragraph 1 (b) GDPR)

Personal data is only processed for the purpose of providing transactions and financial services in the course of the fulfilment of our contracts with our clients, or for the performance of pre-contractual measures taken. Further details about the purpose of data processing can be found in the relevant contractual documents and terms and conditions.

b. In compliance with legal obligations (Art. 6 paragraph 1 (c) GDPR) or in the public interest (Art. 6 paragraph 1 (e) GDPR)

In addition, as a company we are subject to various legal obligations or statutory requirements (e.g. German Banking Act, Money Laundering Act, Securities Trading Act, tax laws) as well as banking supervisory requirements (e.g. of the German Federal Financial Supervisory Authority). The purposes of processing include identity and age verification, as well as prevention of fraud and money laundering.

c. In connection with legitimate interests (Art. 6 paragraph 1 (f) GDPR)

Where necessary, we process your data beyond the actual performance of the contract in order to safeguard the legitimate interests of ourselves or third parties. Examples:

- Assertion of legal entitlements and defence in the event of legal disputes
- Ensuring IT security and IT operations of the Bank
- Prevention of criminal acts
- Videos surveillance to safeguard against trespassers, to gather evidence in the event of robbery or fraud or to document disposals and deposits, e.g., at ATMs
- Measures for building and systems security (e.g., admittance control)
- Measures to ensure against trespassing

d. By virtue of your consent (Art. 6 paragraph 1 (a) GDPR)

Where you have given us your consent to the processing of personal data for specific purposes (e.g. dissemination of data within the association/group), such processing is legal by virtue of your consent. Consent granted may be revoked at any time. This also applies to the revocation of declarations of consent issued to us before the EU GDPR took effect, i.e. prior to 25 May 2018. Please note that revocation only takes effect in the future and that any processing carried out before this date is not affected.

4. Who gets access to my data

Those entities of DWS that require your data for the performance of our contractual and statutory duties are given access. Service providers and agents we employ may be given access to data for such purposes, provided they ensure confidentiality and compliance with our written data protection policies. With regard to the exchange of data with recipients outside the management company, it should first be noted that as a management company, we are required to maintain confidentiality regarding all client-related facts and assessments (applies equally to representatives/agents) of which we become aware. We may only pass on information about you where required by statutory provisions, if you have granted your consent and/or where the order processors we employ likewise ensure confidentiality and comply with the requirements of the EU General Data Protection Regulation/German Federal Data Protection Act.

5. Is data transferred to third countries or international organisations

Data is only transferred to entities in countries outside the EU or EEA (“third countries”) insofar as this is necessary for the performance of the instructions of the client for which you are acting (e.g. payment and securities instructions), as this is required by law (e.g. reporting duties in accordance with tax law) or as you

have granted us your consent, or in the course of processing order data. Where third-country service providers are used, they are required to comply with European data protection standards through the agreement of standard EU contractual clauses in addition to written policies.

6. How long is my data stored for

We process and store your personal data for as long as you are authorised to represent the relevant legal person.

If the data is no longer required for the performance of contractual or statutory duties, it is deleted on a regular basis unless further processing (for a limited period) is required for the following purposes:

- Compliance with retention periods required under commercial and tax law: these include the Commercial Code, Tax Code, Banking Act, Money Laundering Act and Securities Trading Act. The deadlines for retention or documentation stipulated therein amount to two to ten years.
- Collection of evidence in the context of the limitation rules. In accordance with §§195 et seq. of the Civil Code (BGB), the period of limitation may be up to 30 years; however, the standard period of limitation is 3 years.

7. What data protection rights do I have

Every affected person has the right to **information** pursuant to Art. 15 GDPR, the right to **rectification** pursuant to Art. 16 GDPR, the right of **erasure** pursuant to Art. 17 GDPR, the right to **restriction of processing** pursuant to Art. 18 GDPR, the right to **object** pursuant to Art. 21 GDPR and the right to **data portability** pursuant to Art. 20 GDPR. The restrictions pursuant to §§34 and 35 of the Federal Data Protection Act apply in the case of the right to information and the right of erasure. A right of appeal to a data protection authority also exists (Art. 77 GDPR in conjunction with §19 of the Federal Data Protection Act).

You can revoke consent granted to us for the processing of personal information at any time. This also applies to the revocation of declarations of consent issued to us before the GDPR took effect, i.e. prior to 25 May 2018. Please note that revocation only takes effect in the future. Processing that occurred prior to the revocation is unaffected.

8. Am I under any obligation to provide data

As part of our business relationship with the legal person represented by you, you must provide us with the personal data required for taking up and performing a representative role and for the fulfilment of the associated contractual obligations, or that which we are required by law to collect. Without this data, we must as a rule reject you as an authorised representative/agent or cancel an existing right of representation.

In particular, we are required by the money laundering rules to identify you prior to establishing the right of representation (for example, on the basis of your ID card), and to collect and record your name, place of birth, date of birth, nationality and home address. To ensure we are able to meet this statutory requirement, you must make the required information and documentation available to us in accordance with §4 paragraph 6 of the Money Laundering Act, and notify us immediately of any changes that occur during the business relationship. If you do not provide us with the required information and documentation, we are entitled to refuse to accept or continue the right of representation requested by the relevant legal person.

Information about your right to object pursuant to Art. 21 of the EU General Data Protection Regulation (GDPR)

Right to object on an individual basis

For reasons arising on account of your particular circumstances, you have the right to lodge an objection to the processing of data relating to you carried out on the basis of Art. 6 paragraph 1 (e) GDPR (data processing in the public interest) and Art. 6 paragraph 1 (f) GDPR (data processing on the basis of legitimate interests) at any time.

If you lodge an objection, we will no longer process your personal information unless we can prove compelling, legitimate reasons for processing that outweigh your interests, rights and freedoms, or where processing serves the assertion, performance or defence of legal entitlements.

The objection may be lodged informally, and where possible should be sent to dws.lu@db.com

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