

Data protection information in accordance with the EU General Data Protection Regulation for “natural 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 largely determined by the requested/agreed services in question.

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 obtained from **our clients** in the course of the business relationship. Where necessary for the provision of our service, we also process personal data we have received on an authorised basis from other companies in the Deutsche Bank group (e.g. data needed for the purpose of executing instructions or performing contracts, or which we are entitled to process by virtue of your consent). 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 use in the marketing process, when establishing master datasets, in the course of an authorisation (power of attorney for a securities account), or for another person holding power of attorney for a securities account or agreement, can include:

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

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 from the product categories listed below. This primarily includes:

Securities transactions/DWS securities account

Current occupation or previous occupation if relevant, detailed information on knowledge and/or experience with securities (MiFID status), investment behaviour/strategy (scope, frequency, risk appetite), financial status (assets, liabilities, income from employment/self-employment/trade or business, expenses), likely changes in financial circumstances (e.g. retirement), tax information (e.g. liability to church tax), documentation data (e.g. investment advice records).

Client contact information

Additional personal information is generated during initial business contact and in the course of the business relationship, in particular through contact in person, by telephone or in writing initiated by you or the Company, e.g. information about contact channels, date, event and outcome; (electronic) copies of correspondence; and information about participation in direct marketing initiatives.

Digital services

With regard to data processed when using digital service products, please see further information on data protection in connection with the relevant digital service (e.g. processing of personal data for identification purposes when using the DWS App or DWS Secure Tan App).

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) and German Federal Data Protection Act (Bundesdatenschutzgesetz – BDSG), as well as current 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 in response to a request from you.

The purposes of data processing are largely determined by the specific product (see point 2) and can include needs analysis, advice and carrying out transactions. Further details about the purpose of data processing can be found in the relevant contractual documents and terms and conditions.

b. 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:

- Advertising or market and opinion research, provided that you have not objected to your data being used
- Assertion of legal entitlements and defence in the event of legal disputes
- Ensuring IT security and IT operations of the Company
- 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
- Measures for business control and the further development of products and services
- Risk management within the Group

c. 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 or to your investment advisor), 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. Processing that occurred prior to the revocation is unaffected. A status overview of the consents you have granted to us may be requested at any time.

d. 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 supervisory requirements (e.g. of the German Federal Financial Supervisory Authority). The purposes of processing include identity verification, prevention of fraud and money laundering, compliance with monitoring and reporting duties required by tax law as well as the assessment and control of risks within the Company and the Group.

4. Who gets access to my data

Those entities of DWS Investment S.A. 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. These are mainly companies from the categories listed below.

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 of which we become aware. We may only pass on information about you where required by statutory provisions, if you have granted your consent, where we are authorised to disclose information 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.

Accordingly, recipients of personal data may include:

- In the case of a statutory or official requirement, public-sector entities and institutions (e.g. Deutsche Bundesbank, Caisse de Consignation, German Federal Financial Supervisory Authority, European Banking Authority, European Central Bank, financial authorities, Federal Central Tax Office).
- Other credit and financial services institutions, comparable institutions and order processors, to which we transfer personal data for the purpose of conducting the business relationship with you.
- Specifically: Processing of bank information, support/maintenance of computer/IT applications, archiving, document processing, call centre services, compliance services, controlling, data screening for anti-money laundering purposes, data destruction, purchasing/procurement, customer management, lettershops, marketing, reporting, research, risk controlling, expenses claims, telephony, video identification, website management, securities service, share register, fund management, auditing service, payment transactions.

Other data recipients may be entities in relation to which you granted your consent to data transmission.

5. Is data transferred to third countries or international organisations

Data is only transferred to countries outside the EU or EEA ("third countries") insofar as this is necessary for the performance of your instructions (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 is necessary in order to perform our contractual and legal obligations. However, it should be noted that our business relationship is a continuing obligation lasting several years.

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 EU 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, you must provide the personal data required for the opening and execution of a business relationship and for the fulfilment of the associated contractual obligations, or that which we are required by law to collect. Without this data, we will normally have to decline the conclusion of the contractual agreement or the execution of the instruction, or we may no longer be able to perform an existing contract and may have to terminate it.

In particular, we are required by the money laundering rules to identify you prior to establishing the business relationship (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 requested business relationship with you.

9. To what extent does automated decision-making (including profiling) occur

In accordance with Art. 22 GDPR, we do not employ fully automated decision-making for the purpose of establishing and implementing the business relationship. Should we use such procedures in isolated instances, we will notify you separately, provided this is permitted by law.

10. Does profiling take place

We process your data to some extent automatically with the aim of evaluating certain personal factors (profiling). We use profiling in the following cases, for example:

in compliance with legal obligations we are required to combat money laundering and fraud. Data analysis (including in relation to payment transactions) is also undertaken. These measures simultaneously serve to protect you.

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

1. 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; this also applies to profiling based on this provision within the meaning of Art. 4 no. 4 GDPR.

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.

2. Right to object to the processing of data for advertising purposes

In individual cases, we will process your personal data in order to engage in direct advertising. You have the right to lodge an objection to the processing of data relating to you for the purpose of such advertising at any time.

If you object to processing for the purpose of direct advertising, we will no longer process your personal data for such purposes.

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

Version: January 2019