Data protection information in accordance with the UK General Data Protection Regulation

March 2024

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 this is processed, are largely determined by the services we provide to you.

Please ensure this information is shared with any other relevant party including authorised representatives and signatories.

1. Who is the entity responsible for data processing and how do I contact them?

The responsible entity is:

DWS Investments UK Limited
Winchester House
1 Great Winchester Street
London EC2N 2DB
Telephone: +44 (0)20 7545 8000
Email address: privacy@dws.com

Our data protection officer can be contacted at:

DWS Investments UK Limited
Data Protection Officer
Winchester House
1 Great Winchester Street
London EC2N 2DB
Telephone: +44 (0)20 7545 8000
Email address: privacy@dws.com

2. What personal data do we collect and how do we obtain it?

We process personal data obtained from **our clients** in the course of our business relationship with you. Where necessary for the provision of our services, we also process authorised personal data we receive from DWS KGaA and its affiliates and subsidiaries ("DWS Group") or from other third parties (such as HM Revenue & Customs). For example, this may include data needed for the purpose of executing instructions, performing our services, or which we are entitled to process by virtue of your consent. We also process personal information that 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 collected for marketing purposes. setting up your account including authorised signatories and those who have power of attorney, can include:

- name
- address including other contact details (telephone, email address)
- date and place of birth
- gender
- nationality
- marital status
- legal capacity
- professional details including employment status (e.g. employed, self-employed)
- identification data (e.g. passport)
- authentication data (e.g. specimen signature)

- tax reference number (e.g. Unique Taxpayer Reference UTR), and
- US FATCA status.

In addition to the above list, additional personal data may be collected, processed and stored in connection with the conclusion of agreements and use of products and services from the product categories listed below. This primarily includes:

Asset Management Services, Funds and Products provided by DWS
Current or previous occupation if relevant, detailed information on knowledge and/or experience with securities (UK 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, 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, 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 any DWS App).

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

We process personal data in accordance with the UK General Data Protection Regulation and the Data Protection Act 2018:

a. For the performance of contractual duties

Personal data is only processed for the purpose of providing services in the course of the fulfilment of our contracts with our clients, or for the performance of pre-contractual actions taken in response to a request from you.

The purposes of data processing are largely determined by the specific product (see point 2 above) and can include needs analysis, advice and execution of 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

Where necessary, we may process your data beyond the actual performance of the contract to safeguard our, including third parties', legitimate interests. Examples of legitimate interests include:

- 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 DWS Group's IT security and IT operations
- Prevention of criminal acts
- Measures for building and systems security (e.g. admittance control and video surveillance)
- Measures for business control and the further development of products and services
- Risk management within DWS Group

c. By virtue of your consent

Where you have given us your consent to the processing of personal data for specific purposes (e.g. dissemination of data within the DWS 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. Processing that occurred prior to the revocation is unaffected. You may request an overview of the consents you have provided us at any time.

d. In compliance with legal obligations

In addition, as a company we are subject to various legal obligations or statutory requirements (e.g. Companies Act 2008, UK anti-money laundering laws, Financial Services and Markets Act 2000, tax laws) as well as supervisory requirements (e.g. the Financial Conduct Authority). In order to meet our legal and regulatory

obligations, the processing of data may 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 DWS Investment UK Limited (the ”Company”), its affiliates and the DWS Group.

4. Who gets access to my personal data?

We will provide your personal data to those affiliates of the Company and members of the DWS Group that require your data for the performance of our contractual and statutory duties. 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 institutions from the categories listed further below.

With regard to the exchange of data with recipients outside the Company, it should be noted that we are required to maintain confidentiality regarding all client-related facts and assessments. Generally speaking, we may only pass on information about you where required by law, and where we are authorised to disclose such information including where third parties who process data required to deliver our services to you will likewise ensure confidentiality and comply with the requirements of the UK General Data Protection Regulation, the Data Protection Act 2018 and other related EU and local data protection laws.

Recipients of personal data may include:

- In the case of a legal or regulatory requirements, public-sector entities and institutions, e.g. the Financial Conduct Authority and other financial regulators and HM Revenue & Customs;
- Other credit and financial services institutions, comparable institutions and order processors, to which we transfer personal data for the purpose of conducting our business relationship with you; and
- Third parties : Processing of bank account information, support/maintenance of computer/IT applications, archiving, document processing, compliance services, controlling, data screening for anti-money laundering purposes, data destruction, purchasing/procurement, customer management, marketing, reporting, research, risk controlling, expenses claims, telephony, video identification, website management, securities service, share register, fund management (including, but not limited to, information provided to fund administrators, depositaries, custodians and transfer agents), auditing service, payment transactions.

We may share data with other organisations for which you have provided your consent.

5. Is data transferred outside the UK?

Data is only transferred to countries outside the UK insofar as this is necessary for the performance of your instructions (e.g. executing investment and payment instructions), where this is required by law (e.g. reporting duties in accordance with tax law) or if you have granted us your consent, or in the course of processing order data. Where service providers outside the UK are used, they are required to comply with UK data protection standards under their agreement which includes standard data protection 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 required to provide our services to you. 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 by regulators or under commercial and tax law.
- Collection of evidence in the context of the limitation rules.

7. What data protection rights do I have?

Pursuant to UK GDPR, you have the right to be informed, the right of access, the right to rectification, the right of erasure/to be forgotten, the right to restrict processing, the right to data portability, the right to object and rights in relation to automated decision making and profiling.

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 which we are legally required to collect. Without this data, we will normally have to decline the conclusion of the agreement or the execution of the instruction, or we may no longer be able to perform an existing service and may need to terminate it.

In particular, we are required by anti-money laundering laws to identify you prior to establishing a business relationship (for example, on the basis of your passport), 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, 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?

We can confirm that we do not employ fully automated decision-making for the purpose of establishing and implementing the business relationship unless we have notified otherwise.

10. Does profiling take place?

We use automated tools to process your data, 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 the UK General Data Protection Regulation (GDPR)

1. Right to object on an individual basis

For reasons arising on account of your circumstances, you have the right to lodge an objection to the processing of data relating to you at any time; this also applies to profiling.

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 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, and where possible should be sent to privacy@dws.com