

**VICTORY ASSET MANAGEMENT AG**  
**NOTICE OF EU/ EEA PRIVACY POLICY**

Victory Asset Management AG (the “**Investment Manager**”) is committed to protecting your privacy and maintaining the confidentiality and security of your personal information. Any personal information processed by the Investment Manager is controlled by the Investment Manager and the Investment Manager is the data controller of your personal information. Where your details are provided to the Investment Manager as a consequence of your investment (or potential investment) in a private investment fund for which the Investment Manager serves as investment manager (each a “**Fund**”), then the Investment Manager, acting as a data controller, may itself (or through a third party such as CACEIS Ireland Limited (the “**Administrator**”) acting in its capacity as the Fund’s administrator) process your personal information or, if you are an entity, that of your (i) beneficial owner(s), (ii) employees, and (iii) directors, officers, trustees, general partners, managers, or other persons serving in a similar capacity (as distinguished from the entity itself) (the foregoing collectively, “**Your Personal Information**”). When processing Your Personal Information, there may also be times when the Administrator will act as a data controller.

The Investment Manager’s European Union representative is DPR Group whose location addresses are listed in the Appendix to this policy. DPR Group can also be contacted at [datainquiry@dpr.eu.com](mailto:datainquiry@dpr.eu.com) quoting <Victory Asset Management AG> in the subject line.

This policy (the “**EU Privacy Policy**”) explains the manner in which the Investment Manager collects, utilizes and maintains non-public personal information about investors and potential investors (“**Investors**”) based in the European Union (“**EU**”) or the European Economic Area (“**EEA**”), as required under the General Data Protection Regulation (EU) 2016/679 (“**GDPR**”). This EU Privacy Policy applies to your investment or potential investment in the Fund.

### **Collection of Your Personal Information**

The Investment Manager collects Your Personal Information from the following sources, as applicable:

1. Subscription documents and other information provided by the Investor in writing, in person, by telephone, electronically or by any other means (this information includes (i) name, address, income, financial and investment qualifications, and tax-related information, birth date, nationality, passport or other identification number, and employment information);
2. Transactions within the Fund, including account balances, investments, redemptions and management fees and performance allocations; and
3. Other interactions with the Investment Manager (for example, discussions with our staff).

### **Why We Use Your Personal Information**

Your Personal Information may be processed by the Investment Manager and/or the Administrator (or any of their affiliates, agents, employees, delegates or sub-contractors) for the following purposes, as applicable:

1. to facilitate your investment in the Fund and the management and administration of your investment in the Fund on an ongoing basis which are necessary to fulfill all contractual and regulatory obligations related to your investment in the Fund, including without limitation the acceptance and processing of subscription documents and redemption and transfer requests;
2. in order to carry out anti-money laundering checks and related actions which the Investment Manager and/or Administrator considers appropriate or necessary to fulfill any of their legal obligations on an

ongoing basis (i) with respect to the prevention and/or detection of fraud, money laundering, terrorist financing, bribery, corruption, and/or tax evasion and (ii) to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions, all of the foregoing in accordance with the Investment Manager's and the Administrator's anti-money laundering policies and procedures;

3. to comply with their legal obligations and, in particular, to report tax-related information to tax authorities;
4. to disclose information to other third parties such as service providers of the Fund, the Investment Manager and/or Administrator (including, for example, attorneys, accountants, auditors, or other professionals), regulatory authorities and technology providers in order to comply with any legal obligation imposed on the Fund, Investment Manager and/or Administrator or in order to pursue the legitimate interests of the Fund, Investment Manager and/or Administrator;
5. to monitor and record electronic communications and, if applicable, calls, for any of the purposes specified herein; and/or
6. to otherwise pursue the legitimate interests of the Investment Manager and/or Administrator relating to your investment or your potential investment in the Fund, and/or where the processing of Your Personal Information would be in the public interest.

### **Countries Having Access to Your Personal Information**

The Investment Manager's servers, which store and keep Your Personal Information, are located in Switzerland.

The Investment Manager also engages with service providers whose personnel will have access to Your Personal Information and that are located in other jurisdictions. Transfers to these service providers are necessary for the performance of the contract between the Fund and the Investor. These jurisdictions either (i) afford an adequate level of protection for Your Personal Information (as declared by the European Commission) or, (ii) if they do not, then the Investment Manager and/or the Fund has entered into an agreement with these service providers incorporating clauses the same or substantially similar to the standard contractual clauses, as well as other relevant provisions, contained in the GDPR, and obligations no less onerous than those contained in this EU Privacy Policy.

### **Collecting Investor Information Legally**

The Investment Manager and the Administrator are able to legally collect and use Your Personal Information either because:

1. you have consented to their doing so; and/ or
2. it is necessary for the performance of a contract to which the Investor is a party or in order to take steps at the request of the Investor prior to entering into a contract; and/ or
3. collecting and using Your Personal Information is necessary for the Investment Manager and/or the Administrator to fulfill their legitimate business interests, which may include, without limitation, investigating, defending against, or prosecuting any actual, threatened, or potential claim in a court of law or other judicial or regulatory forum, or otherwise protect their legal rights; and/ or
4. it is necessary to comply with any applicable regulatory, judicial or other legal obligations applicable to the Investment Manager and the Administrator.

### **Retention of Investor Information**

The Investment Manager and the Administrator will retain Your Personal Information for the purposes described in (1), (2), (3) and (4) in the immediately preceding paragraph as long as required for the purposes described above.

In particular, and without limitation to the foregoing, the Investment Manager and the Administrator have legal obligations imposed on them under applicable legal systems which require them to retain Your Personal Information for certain minimum time periods.

## Your Rights

You have the right to:

1. be informed about Your Personal Information that the Investment Manager and/or the Administrator collects from you, uses, and retains, which this EU Privacy Policy seeks to do;
2. obtain confirmation from the Investment Manager that Your Personal Information is being collected, used, and retained as described above and to access Your Personal Information held by the Investment Manager;
3. have Your Personal Information corrected if it is inaccurate or incomplete at any time;
4. erasure, or the right to be forgotten, which means you can request deletion or removal of any of Your Personal Information the Investment Manager holds about you at any time, subject to the Investment Manager's or the Administrator's rights to retain Your Personal Information as provided for under the GDPR;
5. block or suppress the Investment Manager collecting and using Your Personal Information, which means the Investment Manager can continue to store Your Personal Information but cannot further collect or use it in any way;
6. obtain and re-use any of Your Personal Information that the Investment Manager holds about you for your own purposes across different services, which allows you to move, copy or transfer Your Personal Information easily from the Investment Manager to another place identified by you to the Investment Manager in a safe and secure way without hindrance to the usability of Your Personal Information;
7. object to the Investment Manager collecting, using or retaining Your Personal Information where this is based on:
  - a. your legitimate interest or the performance of a task in the public interest; or
  - b. direct marketing even if otherwise legally permitted; and
8. withdraw your consent to the use of Your Personal Information at any time, as described below.

To make any requests as listed above, please contact the Investment Manager at [gdpr@victoryam.com](mailto:gdpr@victoryam.com)

The Investment Manager will respond to requests relating to your rights above within one month of receipt of your request, or within two months of receipt of your request where this request is more complex.

## Withdrawal of Your Consent

You can tell the Investment Manager to stop collecting, using and retaining Your Personal Information at any time by emailing the Investment Manager at [gdpr@victoryam.com](mailto:gdpr@victoryam.com) You should note that, notwithstanding your withdrawal of consent, the Investment Manager may be legally required to retain some or all of Your Personal Information.

Where the Investment Manager or the Administrator requires Your Personal Information to comply with AML or other legal requirements, failure to provide this information will mean that you will be unable to be accepted as an investor in the Fund and/or may be mandatorily redeemed from the Fund if you are already an Investor.

## **Protection of Investor Information**

The Investment Manager maintains appropriate technical and organizational measures to ensure a level of security appropriate to potential risks, including physical, electronic and procedural safeguards that comply with the GDPR to protect customer information, including:

1. the pseudonymization and encryption of Your Personal Information where appropriate;
2. ensuring ongoing confidentiality, integrity, availability and resilience of processing systems and services;
3. ensuring the Investment Manager can restore access to Your Personal Information in a timely manner if a physical or technical incident occurs; and
4. regular testing, assessment and evaluation of the effectiveness of its technical and organizational measures to attempt to ensure Your Personal Information is secure.

The Investment Manager restricts access to the personal and account information of Investors to those employees and third-parties who need to know that information in the course of their job responsibilities. The Investment Manager will destroy, erase or make unreadable data, computer files and documents containing Your Personal Information that is non-public prior to disposal.

## **Making a Complaint**

If you would like to make a complaint about the way the Investment Manager has collected, used or retained Your Personal Information, please contact us at [gdpr@victoryam.com](mailto:gdpr@victoryam.com)

You have the right to lodge a complaint with a supervisory authority in the EU Member State of your habitual residence or place of work or in the place of the alleged infringement if you consider that the processing of personal data relating to you carried out by the Investment Manager or its service providers infringes the GDPR.

## **Former Customers and Investors**

This EU Privacy Policy also applies to former Investors in the EU and the EEA.

## **Further Information**

The Investment Manager reserves the right to change this EU Privacy Policy at any time and without prior notification. The examples contained within this EU Privacy Policy are illustrations and are not intended to be exclusive. This EU Privacy Policy complies with the GDPR regarding privacy. You may have additional rights under other foreign or domestic privacy laws in addition to those that are described above. If you have any questions about this EU Privacy Policy, please email [gdpr@victoryam.com](mailto:gdpr@victoryam.com) Other than as described above, no further action is required on your part.

## APPENDIX

Postal requests must be addressed to 'DPR Group' and not Victory Asset Management AG directly. Communications addressed to Victory Asset Management AG directly but at DPR Group's contact locations will likely not be received. Any BPM number, if quoted, is also essential to include.

<b>Country</b>	<b>Address</b>
<b>Austria</b>	DPR Group, City Tower, Brückenkopfgasse 1/6. Stock, Graz, 8020, Austria
<b>Belgium</b>	DPR Group, Place de L'Université 16, Louvain-La-Neuve, Waals Brabant, 1348, Belgium
<b>Bulgaria</b>	DPR Group, 132 Mimi Balkanska Str., Sofia, 1540, Bulgaria
<b>Croatia</b>	DPR Group, Ground & 9th Floor, Hoto Tower, Savska cesta 32, Zagreb, 10000, Croatia
<b>Cyprus</b>	DPR Group, Victory House, 205 Archbishop Makarios Avenue, Limassol, 3030, Cyprus
<b>Czech Republic</b>	DPR Group, IQ Ostrava Ground floor, 28. rijna 3346/91, Ostrava-mesto, Moravska, Ostrava, Czech Republic
<b>Denmark</b>	DPR Group, Lautruphøj 1-3, Ballerup, 2750, Denmark
<b>Estonia</b>	DPR Group, 2 <sup>nd</sup> Floor, Tornimae 5, Tallinn, 10145, Estonia
<b>Finland</b>	DPR Group, Luna House, 5.krs, Mannerheimintie 12 B, Helsinki, 00100, Finland
<b>France</b>	DPR Group, 72 rue de Lessard, Rouen, 76100, France
<b>Germany</b>	DPR Group, 3rd and 4th floor, Altmarkt 10 B/D, Dresden, 01067, Germany
<b>Greece</b>	DPR Group, 24 Lagoumitzi str, Athens, 17671, Greece
<b>Hungary</b>	DPR Group, EMKE Building, Rákóczi Út 42, Budapest, 1072, Hungary
<b>Ireland</b>	DPR Group, The Cube, Monahan Road, Cork, T12 H1XY, Republic of Ireland
<b>Italy</b>	DPR Group, BPM 335368, Via Roma 12, 10073 , Turin, Italy
<b>Latvia</b>	DPR Group, 4th & 5th floors, 14 Terbatas Street, Riga, LV-1011, Latvia
<b>Lithuania</b>	DPR Group, Vilniaus g.31, Vilnius, LT- 01402, Lithuania
<b>Luxembourg</b>	DPR Group, BPM 335368, Banzelt 4 A, 6921, Roodt-sur-Syre, Luxembourg
<b>Malta</b>	DPR Group, Tower Business Centre, 2nd floor, Tower Street, Swatar, BKR4013, Malta
<b>Netherlands</b>	DPR Group, Cuserstraat 93, Floor 2 and 3, Amsterdam, 1081 CN, Netherlands
<b>Poland</b>	DPR Group, Budynek Fronton ul Kamienna 21, Krakow, 31-403, Poland
<b>Portugal</b>	DPR Group, Torre de Monsanto, Rua Afonso Praça 30, 7th floor, Algès, Lisbon, 1495-061, Portugal
<b>Romania</b>	DPR Group, World Trade Centre, Piata Montreal no 10, Entrance F, 1st Floor, Sector 1, Bucharest, 11469, Romania
<b>Slovakia</b>	DPR Group, Apollo Business Centre II, Block E / 9th floor, 4D Prievozska, Bratislava, 821 09, Slovakia
<b>Slovenia</b>	DPR Group, Trg. Republike 3, Floor 3, Ljubljana, 1000, Slovenia
<b>Spain</b>	DPR Group, Puerta de las Naciones, Ribera del Loira 46, Madrid, 28042, Spain
<b>Sweden</b>	DPR Group, S:t Johannesgatan 2, 4th floor, Malmo, SE - 211 46, Sweden
<b>United Kingdom</b>	DPR Group, BPM 335368, 372 Old Street, EC1V 9AU, London, United Kingdom