GATEWAY
fund services

Data Privacy Notice



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1. Introduction

Gateway Fund Services Limited (the Firm) takes privacy and the protection of your personal data very seriously.

In this notice, we explain the personal data we collect, how we collect it, how we use it, store it, retain it, who we transfer it to, our legal basis for processing your data, your rights, how to contact us and how to complain.

2. Who are we?

When we talk about Gateway Fund Services Limited or "we," "us," Gateway" or "GFSL," we are talking about Gateway Fund Services Limited, 56 Fitzwilliam Square North, Dublin 2, D02 X224, Ireland - a management company authorised and supervised by the Central Bank of Ireland under registration number C183076.

Further details regarding us can be located on the Central Bank of Ireland's website under the Registers section, www.registers.centralbank.ie.

Where we act as management company of the investment vehicles / companies and funds, we do not process your personal data and are not the data controller. The data controller is the Investment Vehicle / Company that you invest in by investing in their Funds.

We process personal data when we undertake due diligence in respect of our delegates / service providers and when we provide additional services to the Investment Vehicles / Companies.

3. How to contact us?

You can contact us at gateway@gfsmanco.com or by calling +353 1 533 7813 or by writing to us at Gateway Fund Services Limited, 56 Fitzwilliam Square North, Dublin 2, D02 X224, Ireland.

4. What data do we collect?

We do not collect personal data from you directly. The service providers to the investment vehicles / companies and funds where we are appointed as Manager "they" do collect personal data from you on behalf of each investment vehicle and fund that you invest in. These are listed in the table below.

The personal data they collect from you is the information that you provide in your application or account opening forms and your initial subscription form.

This is your name, address, contact details including email address and telephone number, your bank account details, your date of birth, your tax residency details, nationality and citizenship, tax identification number, additional tax information contained in your tax documentation, your source of wealth, identity information including your photograph, your place and country of birth, your occupation, and whether you are a politically exposed person.

We collect personal data from our delegates / service providers when we complete due diligence and ongoing monitoring. This is personal data on Directors / Management – name, address, contact details including email addresses and telephone numbers.

We collect personal data from the Directors of Investment Vehicles / Companies when we provide additional services. This is name, address, date of birth, contact details including email addresses and telephone numbers, nationality, citizenship, identity information including photograph, place and country of birth, and occupation.

4.1 Service Providers

The privacy notices of each of the service providers can be located on their websites.

Société Générale Security	www.securities-services.societegenerale.com	service.ta-dublin@sgss.socgen.com dataprotection.sgssireland@sgss.socgen.com	Fund Administration

Services SGSS (Ireland) Limited	Data & GPDR, General Data Protection Regulation - Societe Generale	DPO.sgssireland@sgss.socgen.com	
CACEIS Ireland Limited	Data Protection Policy - CACEIS CACEIS IS - European Privacy Policy Statement - CACEIS	caceisdpo@caceis.com fb-reg-ireland2@caceis.com IS-DPO@caceis.com	Fund Administration

5. How do we use it?

We do not use your personal data. The service providers to the investment vehicles / companies and funds where we are appointed as Manager ("they") use your data to open your account, process your subscription(s), redemption(s), communicate with you, send you periodic statements, and administer your account. Your personal data is also used to complete mandatory legal and compliance checks for money laundering, terrorist financing and tax evasion.

We use personal data from our delegates / service providers to complete due diligence and ongoing monitoring.

We use personal data from Directors of Investment Vehicles / Companies to provide them with additional services (such as Fitness and Probity checks) and to incorporate their personal data into Fund Prospectuses.

6. How do we store it?

We do not store your personal data. The service providers to the investment vehicles / companies and funds where we are appointed as Manager ("they") store your personal data using all physical, technical, and organisational measures needed to ensure the security, confidentiality, and integrity of your personal data.

Each of the service providers to the investment vehicles / companies and funds where we are appointed Manager represents and warrants to us, and to the investment vehicles, that it has implemented various procedures and systems to safeguard your personal data.

We store personal data relating to our delegates / service providers on our servers and with third-party service providers. We store personal data relating to Investment Vehicles / Companies on our servers safely and securely and we employ measures to ensure this data is secure, confidential, and its integrity is maintained. Where we use third party service providers, they represent and warrant to us that they have implemented various procedures and systems to safeguard this personal data.

7. How long do we keep it?

We do not keep your personal data. The service providers to the investment vehicles / companies and funds where we are appointed as Manager ("they") retain your personal data for only as long as is necessary to manage your account or for as long as is mandated by law or for the purposes of an ongoing legal claim.

The retention period under money laundering and terrorist financing law runs from the date on which the relationship ends or the date of the last transaction (whichever is later) for 5 years. The retention period for tax records is 6 years after the end of the tax year to which they refer.

We keep personal data relating to our delegates / service providers for as long as the relationship continues. We keep personal data relating to Investment Vehicles / Companies for a period of six years after the relevant Director has ceased to perform their role with the Investment Vehicle / Company.

8. To whom do we transfer it?

We do not transfer your personal data to any other person, natural or legal. The service providers to the investment vehicles / companies where we are appointed as Manager ("they") transfer your data to their other group companies or to third

parties outside of their groups – to provide the service to you, and for the prevention of money laundering, terrorist financing, and tax evasion.

They may also share your personal data with third parties to meet any applicable law, regulation, or lawful request, or where they believe they have been given misleading information or suspect criminal activity, to law enforcement or other similar bodies.

The communication of this information can involve the transfer of your personal data to countries outside the European Economic Area, whose legislation on the protection of your personal data is different from that of the European Union. In such cases, they will ensure that appropriate safeguards are in place prior to the transfer of your personal data.

We do not transfer the personal data of our delegates / service providers.

We transfer the personal data of the Directors of Investment Vehicles / Companies to third-party service providers to provide additional services to the Investment Vehicle / Company, such as Fitness and Probity checks.

9. Our Legal Basis for processing

We do not process your personal data. The service providers to the investment vehicles / companies and funds where we are appointed as Manager ("they") rely on the following legal bases for processing your data:

- Contract performance
- Legitimate interests
- Legal obligations

Our legal bases for processing personal data in relation to our delegates / service providers are:

- Contract Performance
- Legitimate interests
- Legal obligations

Our legal bases for processing personal data in relation to Investment Vehicles / Companies are:

- Contract Performance
- Legal obligations

10. What are your rights?

You have several legal rights in relation to your personal data. Contacts for exercising your rights are as follows:

Gateway Fund Services Limited	www.gatewayfundservices.com	gateway@gfsmanco.com	Manager	Data Processor on behalf of the Investment Vehicle / Company where we provide

				additional services to the Investment Vehicle or Company. Data controller in relation to delegates / service providers where we complete due diligence.
Société Générale Security Services SGSS (Ireland) Limited	www.securities-services.societegenerale.com Data & GPDR, General Data Protection Regulation - Societe Generale	service.ta-dublin@sgss.socgen.com dataprotection.sgssireland@sgss.socgen.com DPO.sgssireland@sgss.socgen.com	Fund Administration	Data Processor on behalf of the Investment Vehicle / Company
CACEIS Ireland Limited	www.caceis.com Data Protection Policy - CACEIS CACEIS IS - European Privacy Policy Statement - CACEIS	caceisdpo@caceis.com fb-reg-ireland2@caceis.com IS-DPO@caceis.com	Fund Administration	Data Processor on behalf of the Investment Vehicle / Company

You can contact us, or the service providers and we or they will facilitate your request.

Right of access - you have the right to obtain a free of charge copy of your personal data undergoing processing from the data controller.

Right to rectification – you have the right to have your personal data undergoing processing to be corrected if inaccurate or completed if incomplete.

Right to erasure (to be forgotten) – you have the right to have your personal data undergoing processing erased in certain circumstances.

Right to restriction of processing – you have the right to have the processing of your personal data restricted in certain circumstances.

Right to object – you have the right to object to the processing of your personal data (including profiling) in certain circumstances.

Right to data portability – you have the right to receive your personal data undergoing processing in a structured, commonly used, and machine-readable format and the right to have this data transmitted to another data controller, in certain circumstances.

Right to complain – you have the right to lodge a complaint with the supervisory authority.

11. How to complain?

Write to the Data Protection Commission:

Postal Address: Data Protection Commission
6 Pembroke Row
Dublin
D02 X963
Ireland

Contact the Data Protection Commission using their webforms (preferred by Data Protection Commission)
How to contact us | Data Protection Commission

Telephone their helpdesk:

Helpdesk Hours
09:30 - 13:00hrs (Monday - Friday): 01 765 0100
14:00 - 17:30hrs (Monday - Friday): 1800 437 437

12. Date of this Notice and Updates

This notice is dated 08 August 2025. Any updates to this notice will be on our website and clearly marked as updates.