

28 July 2022

Who are we?

This privacy notice ("Privacy Notice") is provided by members of Invesco Ltd's group of companies ("Invesco Group") and investment funds managed by members of the Invesco Group listed in section "Who are the relevant controllers?" below (collectively "we", "our" and "us"). We are each controllers of your personal data under applicable data protection laws which may include the EU General Data Protection Regulation ("GDPR") and the UK version of the GDPR ("UK GDPR"). We, as controllers, determine why and how we collect and use your personal data.

What is the purpose of this Privacy Notice?

When you, your client or the organisation you represent invest in a fund, receive our services or otherwise interact with us, we collect information about you which constitutes personal data under applicable laws. Personal data means any information about an identified or identifiable natural person. This Privacy Notice explains how we collect, use, share and protect your personal data. Please read this Privacy Notice carefully to understand what we do with your personal data. We may change this Privacy Notice from time to time and if we make any material changes, then we will make the updated Privacy Notice available to you on our websites or by other means. The date at the top of this Privacy Notice indicates when this Privacy Notice was last updated. In certain circumstances, we may provide supplemental privacy notices which should be read together with this Privacy Notice.

Whose personal data do we collect?

We collect and process personal data about individuals (data subjects) who may be current, prospective or:

- (i) individual investors (shareholders) and where relevant, their spouses/civil partners,
- (ii) individual intermediaries (e.g. financial advisers), clients and vendors,
- (iii) representatives, directors, officers, authorised signatories, employees, agents and ultimate beneficial owners of corporate intermediaries, shareholders, institutional investors, clients and vendors and
- (iv) any other individual (outside our organisations and the Invesco Group) with whom we interact (collectively "you").

What kind of personal data do we collect about you?

We collect from you personal data such as your name, date of birth, residential address, private and business contact details, passport number, bank account details, debit card details, details of your investments, transaction and/or income information, country of residence for tax purposes, as well as any other personal data we ask you to provide in our application forms, related documents and/or on our websites, or which you choose to share with us.

How do we collect your personal data?

We may collect your personal data when:

- (i) provide it to us in an application form, related documents and/or on our websites;
- (ii) provide it to us in correspondence and conversations with our employees, representatives and intermediaries;
- (iii) make transactions in a fund, such as when you purchase shares from us; and
- (iv) provide your personal data to us in response to our anti-money laundering (AML), counter-terrorist financing (CTF) and know-your-customer (KYC) requests or
- (v) otherwise interact with us. If you use our websites, we may also collect certain information automatically from your computer or device. This information (e.g. cookies, IP addresses) may be considered personal data under applicable laws. Our online privacy notice and cookies policy is available on our websites and provide you with further information about how we use your personal data we collect online.

Do we collect personal data about you from third parties?

We also may collect your personal data such as your name, residential address, and other contact or authentication information from third party sources e.g. from your financial adviser, the organisation you represent, credit reference agencies, authorities, other legal entities and individuals (e.g. if you are not a shareholder, then from the shareholder) and publicly accessible sources, including publicly available profiles, registers and databases e.g. to establish and verify your identity to carry out AML, CTF and KYC checks, find out your contact details if we are unable to contact you, liaise with you in relation to our products and services or for other purposes set out in this Privacy Notice.

How will we use your personal data?

This section of this Privacy Notice explains for what purposes we use your personal data and on which legal bases we rely, to ensure that we process your personal data lawfully. Our legal bases for collecting and using your personal data will include:

- a) to perform our contract with you when you act as an intermediary or invest in a fund e.g. to (i) verify your identity, (ii) open your account, (iii) manage and administer your holdings in your account, including processing your subscriptions and redemptions, maintaining the shareholder registers and providing financial and other information to you;
- b) to comply with our legal and regulatory obligations, including those laid down in financial, tax, company or other laws and regulations applicable to us, some examples including for the purposes of complying with the Foreign Account Tax Compliance Act (FATCA) and the OECD Common Reporting Standard for Automatic Exchange of Financial Account Information (CRS), the Markets in Financial Instruments Directive (MiFID II), as well as AML and CTF laws and regulations, screening against sanctions lists and recording calls and electronic communications relating to transactions and investments;
- c) to pursue our or a third party's (e.g. our affiliates, service providers, agents or delegates) legitimate interests, such as:
 - (i) recovering debts owed by you to us;
 - (ii) mitigating business and operational risks;
 - (iii) complying with internal policies;
 - (iv) sharing your personal data with our affiliates and other members of the Invesco Group for internal administrative and other legitimate business purposes, including to provide our products and services and to market to you;
 - (v) investigating, detecting and preventing fraud and other crime;
 - (vi) ensuring network and information security;
 - (vii) purchasing services from and sharing your personal data with third parties which support us in providing our services to you or the organisation you represent;
 - (viii) recording and monitoring calls and electronic communications to meet our legal and regulatory obligations or for record keeping, security, quality, staff training and other business purposes;
 - (ix) informing you about our and the Invesco Group's products and services, conferences, marketing events or anything else that we think may be of interest to you or the organisation you represent;
 - (x) providing our products and services to you or the organisation you represent, including maintaining the relationship and otherwise interacting with you;
 - (xi) undertaking business analysis and market research relevant to our business;
 - (xii) testing, developing and improving our products and services, websites or systems;
 - (xiii) protecting our and the Invesco Group's interests, including establishing, exercising and defending legal rights and claims; and
 - (xiv) ensuring that our affiliates, service providers, agents and delegates can also comply with their domestic and foreign legal and regulatory obligations. When evaluating whether legitimate interests can be relied on as a legal basis for the processing activities described above, a balancing test is carried out to ensure that our use of your personal data will not be overridden by your interests or fundamental rights and freedoms;

- d) if you are a politically exposed person and we need to use personal data about your political opinions or trade union membership to allow you (or the organization you represent) to invest in a fund, we will rely on the legal basis that this information is manifestly made public by you or is necessary for reasons of substantial public interest on the basis of applicable laws;
- e) in certain circumstances and subject to applicable laws, your consent, however we will make this clear to you at the time of collection of your personal data, and you will have the right to withdraw your consent at any time; and
- f) in some cases, e.g. when we conduct AML, CTF and KYC checks, we may collect your personal data relating to criminal convictions and offences or related security measures if the processing of such information is authorised by applicable laws.

What are the consequences if you fail to provide us with the requested personal data?

If we ask you to provide us with your personal data to comply with a legal requirement, or to allow us to enter into or perform a contract with you, we will advise you (e.g. in an application form or otherwise) whether you are obliged to provide the personal data as well as of the possible consequences if you fail to do so.

For example, if you do not correctly complete all relevant sections of an application form and/or provide us with the correct information e.g. for AML, CTF, KYC or tax purposes or about the source of your wealth, we may reject or delay the processing of your application and/or suspend holdings/payments until the relevant information is received to our satisfaction.

Who do we share your personal data with?

We may share your personal data for the purposes described in this Privacy Notice with our affiliates, other members within the Invesco Group, intermediaries, service providers, agents and delegates, such as administrators, transfer agents, depositaries, distributors, investment advisers, paying agents, registrars, credit reference agencies, auditors, other professional advisers, information technology and marketing service providers, or data analytics firms (and their affiliates, service providers, agents and delegates). Where we use third parties who process your personal data on our behalf as a processor (e.g. administrators, transfer agents, registrars, information technology service providers), we ensure they do so in accordance with our instructions and that they put appropriate technical and organisational security measures in place to adequately protect your personal data. Where we share your personal data with our service providers, we may allow them (e.g. depositaries, banking service providers, paying agents, transfer agents) to process your personal data as controllers under their privacy notices solely for the purposes of providing their services to us, complying with their own (and their affiliates', service providers', agents' and delegates') legal and regulatory obligations or pursuing their legitimate interests as described above in this Privacy Notice, but strictly in connection with the provision of their services to us and in accordance with applicable laws. In certain circumstances, we or they may inform you about how you can access their privacy notices, which will give you further information as to how they use your personal data and how you can exercise your rights in relation to your personal data.

We may disclose your personal data for the purposes set out in this Privacy Notice to other third parties e.g. the police, courts, governmental agencies, tax and other regulatory authorities, where we are legally obliged to do so or in our reasonable opinion such disclosure is necessary to comply with applicable laws and legal processes, support an investigation or to protect our rights and interests.

We may also share your personal data with a potential buyer and their professional advisers in connection with any proposed purchase, merger or acquisition of any part of our business.

As we operate globally, your personal data may be transferred to countries outside the UK, European Economic Area (EEA) or Switzerland, for example, to the United States, Canada, India and Hong Kong. Where the level of protection of personal data in those countries has not been deemed adequate by the European Commission (or e.g. by relevant bodies or applicable laws in the UK or in other countries outside the EEA), we put in place standard data protection clauses or third parties engaged by us may rely on other transfer mechanisms (e.g. binding corporate rules) to provide appropriate safeguards to ensure that your personal data will remain adequately protected in accordance with applicable data protection laws.

For transfers from the UK, you can find a list of countries deemed adequate by the UK as providing an adequate level of protection: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/international-transfers-after-uk-exit/#adequacy>

For transfers of personal data from the EEA, you can find a list of countries deemed by the European Commission as providing an adequate level of protection at https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en

You can obtain a copy of the European Commission standard data protection clauses at https://ec.europa.eu/info/law/lawtopic/data-protection/data-transfers-outside-eu/modelcontracts-transfer-personal-data-third-countries_en

If you would like further information regarding our data transfers or transfer mechanisms we may rely on, please contact us using the details set out in the 'How can you contact us?' section below.

How do we protect your personal data?

To protect the security of your personal data, we implement appropriate technical and organisational security measures which include physical and technical security safeguards and a governance model that ensures that adequate policies, procedures and controls are in place within our organisations.

How long do we hold your personal data for?

We may retain your personal data as long as it remains necessary in relation to the purposes we collected the information for. When determining the appropriate retention period, we consider the risks of the processing, our contractual, legal and regulatory obligations, internal data retention policies and our legitimate business interests as described in this Privacy Notice.

What are your rights in relation to the personal data we hold about you?

Subject to the conditions prescribed in applicable laws, you have the right:

- (i) to access, rectify or request erasure of your personal data;
- (ii) to ask us to restrict the processing of it; and
- (iii) to request the portability of it.

Subject to the conditions prescribed in applicable laws, you have the right:

- (i) to object, on grounds relating to your particular situation, to the processing of your personal data which is based on our or a third party's legitimate interests; and
- (ii) to object to the processing of your personal data for direct marketing purposes.

You can exercise these rights by contacting us using the contact details provided below.

You also have the right to lodge a complaint with your local supervisory authority about our use of your personal data, including in the EU Member State of your habitual residence, place of work or place of the alleged infringement if you consider that our processing of your personal data infringes the GDPR.

How can you contact us?

If you have any questions or concerns about our use of your personal data, please contact our Global Privacy Office by email at emea.privacy@invesco.com or in writing addressed to:

Global Privacy Office

Invesco
Perpetual Park Drive,
Henley-On-Thames,
Oxfordshire,
RG9 1HH
United Kingdom

You can also write to us by sending a letter to the 'Global Privacy Office' at the address of the relevant controller or, where applicable, its designated representative in the EU or the UK, as set out in the next section.

Who are the relevant controllers?

- Gatefold Hayes GP Limited, 27-28 Clements Lane, London, England, EC4N 7AE United Kingdom.
- Greenspruce GP Limited, 7 Albemarle Street, London, W1S 4HQ United Kingdom.
- HVH Immobilien Verwaltungs GmbH, Sendlinger Straße 12, 80331 München, Germany.
- Invesco Asset Management (Schweiz) AG, Talacker 34, CH-8001 Zürich, Switzerland.
- Invesco Asset Management Deutschland GmbH, An der Welle 5, D-60322 Frankfurt am Main, Germany.
- Invesco Asset Management Limited, Perpetual Park, Perpetual Park Drive, Henley-On-Thames, Oxfordshire, RG9 1HH United Kingdom.
- Invesco Asset Management Limited (DIFC Branch), 304 & 305, Level 3, Gate Precinct Building 4, Dubai International Financial Centre, Dubai, 506599, United Arab Emirates.
- Invesco Asset Management Österreich – Invesco Asset Management Deutschland GmbH, Rotenturmstrasse 16-18, A-1010 Wien, Austria.
- Invesco Continental Europe Holdings SA, 37A Avenue J.F. Kennedy, L-1855 Luxembourg.
- Invesco Fund Managers Limited, Perpetual Park, Perpetual Park Drive, Henley-On-Thames, Oxfordshire, RG9 1HH United Kingdom.
- Invesco Funds, Vertigo Building – Polaris, 2-4 rue Eugène Ruppert, L-2453 Luxembourg.
- Invesco Global Asset Management DAC, Registered Office, Ground floor, 2 Cumberland Place, Fenian Street, Dublin 2, Ireland.
- Invesco Holding Company Limited, Perpetual Park, Perpetual Park Drive, Henley-On-Thames, Oxfordshire, RG9 1HH United Kingdom.
- Invesco Investment Management Limited, Ground floor, 2 Cumberland Place, Fenian Street, Dublin 2, Ireland. Details of its representative in the UK: Invesco UK Limited, Perpetual Park, Perpetual Park Drive, Henley-On-Thames, Oxfordshire, RG9 1HH.
- Invesco Liquidity Funds plc, Ground floor, 2 Cumberland Place, Fenian Street, Dublin 2, Ireland.
- Invesco Management GmbH, Sendlinger Straße 12, 80331 München, Germany.
- Invesco Management S.A., 37A Avenue JF Kennedy, L-1855 Luxembourg. Details of its representative in the UK: Invesco UK Limited, Perpetual Park, Perpetual Park Drive, Henley-On-Thames, Oxfordshire, RG9 1HH.
- Invesco Management S.A., Dutch Branch, Vinoly Building, Claude Debussylaan 26, 1082 MD Amsterdam, Netherlands.
- Invesco Management S.A. (Luxembourg) Belgian Branch, 235 Avenue Louise 143/4, B-1050, Brussels, Belgium.
- Invesco Management S.A. (Luxembourg) Swedish Filial, c/o Convendum, Jakobsbegsgatan 16, Box 16404, Stockholm 111 43, Sweden.
- Invesco Management S.A., Succursale en France, 18 rue de Londres, 75009 Paris, France.
- Invesco Management S.A. Succursale Italia, Via Bocchetto, 6, 20123 Milano, Italy.
- Invesco Management S.A. Sucursal en España, Calle Goya 6/ 3rd Floor, 28001 Madrid, Spain.
- Invesco Markets plc, 32 Molesworth Street, Dublin 2, Ireland.
- Invesco Markets II plc, 32 Molesworth Street, Dublin 2, Ireland.
- Invesco Markets III plc, Ground floor, 2 Cumberland Place, Fenian Street, Dublin 2, Ireland.
- Invesco (Nominees) Limited, Perpetual Park, Perpetual Park Drive, Henley-On-Thames, Oxfordshire, RG9 1HH United Kingdom.
- Invesco Pensions Limited, Perpetual Park, Perpetual Park Drive, Henley-On-Thames, Oxfordshire, RG9 1HH United Kingdom.
- Invesco Physical Markets plc, Block A, George's Quay Plaza, George's Quay, Dublin 2, Ireland.