

Privacy Notice

Insight Investment Funds Management Limited (the "ACD")

The purpose of this document is to provide you with information on our use, as ACD of the Insight Investment Discretionary Funds ICVC (the "Fund"), of your personal data in accordance with the EU data protection regime introduced by the General Data Protection Regulation (Regulation 2016/679, the "Data Protection Legislation").

In this document, "we", "us" and "our" refer to the ACD. From time to time the ACD may delegate certain functions to affiliates and other third parties.

In addition, the following words and expressions following shall have the following meanings:

"Administrator"	means Bank of New York Mellon (International) Limited;
"Auditor"	means KPMG LLP;
"Depository"	means National Westminster Bank plc;
"EEA"	means the European Economic Area;
"Investment Adviser"	means Insight Investment Management (Global) Limited; and
"Registrar"	means Bank of New York Mellon (International) Limited.

Who this affects

If you are an individual investor, this will affect you directly. If you are an institutional investor that provides us with personal data on individuals connected to you for any reason in relation to your investment with us, this will be relevant for those individuals and you should transmit this document to such individuals or otherwise advise them of its content.

Your personal data

By virtue of making an investment in the Fund and your associated interactions with us (including the initial application and including the recording of electronic communications or phone calls where applicable) or by virtue of you otherwise providing us with personal information on individuals connected with you as an investor (for example directors, trustees, employees, representatives, shareholders, investors, clients, beneficial owners or agents), you will provide us with certain personal information which constitutes personal data within the meaning of the Data Protection Legislation. We may also obtain personal data on you from other public sources.

This includes, but is not restricted to, the following information relating to you and/or any individuals connected with you as an investor (for example, directors, trustees, employees, representatives, shareholders, investors, clients, beneficial owners or agents): name, residential address, email address, contact details, corporate contact information, signature, nationality, place of birth, date of birth, tax identification, credit history, correspondence records, passport number, bank account details, source of funds details and details relating to your investment activity.

In our use of this personal data, the ACD will be characterised as a "data controller" under the Data Protection Legislation and be responsible for ensuring that your personal data is treated in accordance with Data Protection Legislation. In the event that the ACD delegates certain functions to affiliates and/or other third parties such entities will be considered data processors and their use of your personal data will be governed by a written agreement.

When processing your personal data, there may also be times where other service providers to the ACD (including the Administrator and/or Depositary) will be required to use your personal data for purposes they have determined to be lawful and necessary (i.e. to comply with applicable law in the area of anti-money laundering and counter terrorist financing, where required for global tax reporting purposes or where mandated by a court order or regulatory sanction), in which case they will be characterised as "data controllers".

How we may use your personal data

We may collect, store and use your personal data for lawful purposes disclosed below:

- (i) to reflect your ownership of shares in the Fund (i.e. where this is necessary for the performance of the contract to purchase shares in the Fund including without limitation the processing of redemption, conversion, transfer and additional subscription requests and the payment of distributions);
- (ii) to discharge our anti-money laundering obligation to verify the identity of our customers (and, if applicable their beneficial owners) or for prevention of fraud or for regulatory or tax reporting purposes or in response to legal requests or requests from regulatory authorities (i.e. where this is necessary for compliance with a legal obligation to which we are subject); and/or
- (iii) for direct marketing purposes (that is, us or our affiliates or delegates providing you with information on products and services) or for quality control, business, risk and statistical analysis or for tracking fees and costs or for customer service, training and related purposes (i.e. where this is necessary for the purposes of the legitimate interests of us or a third party)

and such legitimate interests are not overridden by your interests, fundamental rights or freedoms and provided that we are acting in a fair, transparent and accountable manner and have taken appropriate steps to prevent such activity having any unwarranted impact on you and also noting your right to object to such uses, as discussed below).

Should we wish to use your personal data for other specific purposes (including, if applicable, any purpose that requires your consent), we will contact you.

Why we may transfer your personal data to third parties

We may share your personal data with our affiliates and delegates.

In certain circumstances, we and/or our authorised delegates may be legally obliged to share your data and other financial information with respect to your interest in the Fund with the HMRC and they, in turn, may exchange this information with foreign tax authorities including tax authorities located outside the EEA.

We anticipate that your personal data may to varying extents be disclosed to, and processed by, (i) the Administrator, (ii) the Registrar, (iii) the Investment Adviser, (iv) the Auditor, (v) the Depositary, and (vi) legal advisers to the Fund and/or ACD, and each of their respective affiliates and this may include certain entities located outside the EEA.

Your personal data may also be disclosed to such other third party service providers as are engaged by us from time to time in order to process the data for the purposes set out above, including credit agencies, document production and printing companies, and their respective affiliates (including certain entities located outside the EEA) and as required by any court of competent jurisdiction or any competent judicial, governmental or regulatory body.

The data protection measures we take

Any transfer of personal data by us or any of our duly authorised delegates outside the EEA shall be in accordance with the conditions in the Data Protection Legislation.

We and our duly authorised delegates shall apply appropriate information security measures designed to protect data in our/our delegates' possession from unauthorised access by third parties or any form of computer corruption.

We shall notify you of any personal data breach affecting you that is likely to result in a high risk to your rights and freedoms.

Your data protection rights

You have certain rights regarding our use of your personal data summarised as follows:

- the right to access your data (in an easily readable form);
- the right to examine and correct your data;
- the right to restrict the use of your data;
- the right to withdraw any consent given to the processing of your data (where applicable);
- the right to receive information regarding any entities we disclose your data to; and
- the right to lodge a complaint with the Information Commissioner's Office (our lead supervisory authority) or a supervisory authority in the EU member state of your usual residence.

You also have the right to object to the processing of your data where we have considered this to be necessary for the purposes of our legitimate interests.

Please note that the right for your data to be erased (the "right to be forgotten") that applies in some contexts is not likely to be applicable to most, if not all, of the personal data we hold, given the specific nature of the purposes for which we use the data, as described above.

Our retention of your personal data

We or our duly authorised delegates may retain your personal data for a period of up to seven years following your disinvestment from the Fund or the point where your business relationship with us has ceased. Thereafter, we and our duly authorised delegates will refrain from collecting any further personal data on you and shall take appropriate steps to dispose of any records containing your personal data, to the extent this is operationally feasible and proportionate.

Changes to this Privacy Notice

We may need to make changes to this Privacy Notice from time to time and shall do so by amending the version of this Privacy Notice published on our website www.insightinvestment.com (the Privacy Notice can be found in the relevant literature library on the website) and we would therefore invite you to review this regularly so you are informed of the latest position as it affects you.

Getting in touch

The ACD has not appointed a data protection officer. However, should you have any queries or wish to discuss your data protection rights with us, please contact privacy@insightinvestment.com.