

**Privacy Notice**  
**LDI Solutions Plus ICAV (the "ICAV")**

The purpose of this document is to provide you with information on our use 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 ICAV. From time to time the ICAV may delegate certain functions to affiliates and other third parties.

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

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| <b>"Administrator"</b>      | means Northern Trust International Fund Administration Services (Ireland) Limited; |
| <b>"AIFM"</b>               | means Insight Investment Management (Europe) Limited;                              |
| <b>"Depositary"</b>         | means Northern Trust Fiduciary Services (Ireland) Limited;                         |
| <b>"EEA"</b>                | means the European Economic Area; and  |
| <b>"Investment Manager"</b> | means Insight Investment Management (Global) 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 ICAV 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 ICAV will be characterised as a "data controller" under the Data Protection Legislation. In the event that the ICAV 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 ICAV (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) **Where this is necessary for the performance of a contract:** We process your personal data to reflect your ownership of shares in the ICAV and for the performance of the contract to purchase shares in the ICAV including without limitation the processing of repurchase, conversion, transfer and additional subscription requests and the payment of distributions.
- (ii) **Where this is necessary for compliance with a legal obligation to which we are subject:** We process your personal data 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.
- (iii) **Where this is necessary for the purposes of the legitimate interests:** We process your personal data 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. Where we process personal data on the basis of our legitimate interests, we do so in a fair, transparent and accountable manner and take appropriate steps to prevent such activity having any unwarranted impact on you. We do not process your personal data where

such legitimate interests are overridden by your interests, fundamental rights or freedoms. You have a right to object to us processing your personal data on the basis of our legitimate interests.

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**

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 ICAV with the Irish Revenue Commissioners 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 AIFM, (iii) the Investment Manager, (iv) the ICAV's independent auditors, (v) the Depositary, (vi) the ICAV's secretary and registered office provider, and (vii) the ICAV's legal advisers, 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 Chapter V of the Data Protection Legislation.

- (i) Where we transfer personal data outside of the EEA to a country in respect of which the European Commission has adopted an adequacy decision, we transfer this personal data on the basis of Article 45 of the Data Protection Legislation (Transfers on the basis of an adequacy decision).
- (ii) Where we transfer personal data outside of the EEA to a country in respect of which the European Commission has not adopted an adequacy decision, we transfer this personal data on the basis of Article 46 of the Data Protection Legislation (Transfers subject to appropriate safeguards). We ensure that appropriate safeguards are in place in respect of any such

transfer such as standard contractual clauses as adopted by the European Commission in accordance with Article 46(2) of the Data Protection Legislation on 4 June 2021.

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 Data Protection Commission (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 ICAV 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](http://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 ICAV 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](mailto:privacy@insightinvestment.com).