

Northern Trust International Fund
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**NORTHERN
TRUST**

RE: CHANGES TO DATA PRIVACY NOTICES AS PART OF THE NORTHERN TRUST MATRIX™
PROGRAMME

POLAR CAPITAL FUNDS PLC

Dear Investor,

Northern Trust provides Fund Administration services to the above Fund. The purpose of this letter is to inform you, in connection with our role as Administrator of the Fund, of the introduction of an intensive multi-year programme, called Northern Trust Matrix™, which will upgrade, and modernize our technology architecture and operating model across Northern Trust group's transfer agency services. This programme will result in changes to the manner in which your personal data is managed. Please find attached Northern Trust's Data Privacy Notice (DPN), which sets out its obligations and your corresponding rights following the introduction of the Northern Trust Matrix™.

Some of the changes which are being implemented mean that, in providing the Northern Trust Matrix™, Northern Trust and its associated companies will process your personal information as joint data controllers. Northern Trust is therefore updating the Northern Trust DPN to provide you with details of when and how this might arise.

NORTHERN TRUST MATRIX™ - WHAT IS CHANGING?

The Fund will continue to be the data controller of your personal data in connection with your investment in the Fund. In providing administration services directly to the Fund, Northern Trust will continue to act as the data processor of your personal data on behalf of the Fund, and will not act as a joint controller with the Fund.

However, in processing your personal information for associated Northern Trust Matrix™ services (e.g. streamlined customer due diligence, or where you are able to use the new NT Portal), there may be times when Northern Trust and its associated companies will act as joint data controllers in respect of your personal information. Your personal information will not, however, be processed by any Northern Trust entity other than in providing the administration services to the Fund, or in connection with the Northern Trust Matrix™ services.

Should you have any questions with regard to the Northern Trust DPN, please see the section 'How to contact us' in the relevant attached DPN.

Alternatively please use the contact details below:

Email – InvestorNotification@ntrs.com

Phone – +35314345079

Yours sincerely

Head of Client Services Transfer Agency Ireland

Please visit northerntrust.com