M&G (Lux) Investment Funds 1
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3 June 2021

Dear Sir / Madam

We, M&G (Lux) Investment Funds 1 (the **UCI**), wish to inform you (the **Investor**) about certain outsourcing arrangements implemented by our transfer agent, RBC Investor Services Bank S.A. (**RBC**), whereby RBC may be required to disclose and transfer personal and confidential data about you and, as the case maybe, individuals related to you (the **Related Individuals**) (the **Data Transfer**) to other entities in the RBC Group or to third-party subcontractors (together the **Sub-contractors**).

In this letter (the **Notification Letter**), we provide the Investor with relevant information about the context and extent of the Data Transfer.

#### 1. PURPOSE OF THE NOTIFICATION LETTER

Both the Luxembourg legislator and the Luxembourg regulator, the *Commission de surveillance du secteur financier* (the **CSSF**), have imposed additional requirements on (among others) Luxembourg credit institutions, such as RBC, for them to be able to lawfully share personal and confidential data of the UCI and its management company, M&G Luxembourg S.A. (the "Management Company") and the UCI's Investors with Sub-contractors. The personal and confidential data in question include (but is not limited to) the Investor's or the Related Individuals' identification data and documents (notably first name, last name, telephone number and email address, national identifiers such as passport number, identification code, tax identification number or national insurance numbers and personal features such as date and country of birth, as applicable), account information, contractual and other documentation and transactional information of the Investors (the **Confidential Information**).

As a result, and in order to allow the transfer of Confidential Information as part of the Data Transfer to Subcontractors, the UCI needs to inform its Investors of the Data Transfer.

In addition, the UCI would like to inform its Investors that the UCI's updated visa-stamped prospectus dated May 2021 contains the aforesaid disclosure with respect to the Data Transfer.

### 2. PUPOSE AND FEATURES OF THE DATA TRANSFER

The outsourcing arrangements implemented by RBC, and the resulting Data Transfer to Sub- contractors, is a necessity to enable RBC to provide its services with the expected level of performance, efficiency and quality to the UCI, the Management Company and, indirectly, its Investors.

A description of the purposes of the relevant outsourcing arrangements set-up by RBC, the Confidential Information that may be transferred to Sub-contractors thereunder, as well as the country where those Sub-contractors are located is set out in the Annex 1 appended to this Notification Letter.

The Sub-contractors may not be subject to Luxembourg professional secrecy obligations and the professional secrecy obligations applicable to them (if any) may be less stringent than the Luxembourg professional secrecy legislation. This being noted, RBC is legally bound to, and has committed to the UCI and the Management Company that it will, only enter into outsourcing arrangements with Sub-contractors which are either subject to professional secrecy obligations by application of law or which will be contractually bound to comply with strict confidentiality rules.

RBC further committed to the UCI and the Management Company that it will take reasonable technical and organisational measures to ensure the confidentiality of the Confidential Information subject to the Data Transfer and to protect Confidential Information against unauthorised processing. Confidential Information will therefore only be accessible to a limited number of persons within the relevant Sub-contractor, on "a need to know" basis and following



the principle of the "least privilege". Unless otherwise authorised/required by law, or in order to comply with requests from national or foreign regulatory or law enforcement authorities, the relevant Confidential Information will not be transferred to entities other than the Sub-contractors.

#### 3. DATA PROTECTION ASPECTS

The Investor's rights (and the rights of the Related Individuals, where applicable), with regards to the processing of their personal data, as defined and described in the UCI's data privacy notice, are fully applicable to the Data Transfer to the extent relevant. The Investor may obtain a copy of the UCI's data privacy notice upon request.

The Investor hereby undertakes that, where Confidential Information relating to Related Individuals, such as representatives, contact persons, directors, beneficial owners or other natural persons relating to the Investor are subject to the Data Transfer, such persons must be provided with the information contained in this Notification Letter as well as with the UCI's data privacy notice.

The Investor acknowledges that the Confidential Information will be held by the Sub-contractors following the Data Transfer, and may therefore be subject to data processing by them.

From a data protection law perspective, the transfer of personal data will be based on the legal grounds specified in the UCI's data privacy notice.

#### 4. GOVERNING LAW AND JURISDICTION

This Notification Letter is governed by, and shall be construed in accordance with, the laws of the Grand Duchy of Luxembourg.

Any dispute arising in connection with this Notification Letter shall be submitted exclusively to the courts of Luxembourg.

## 5. QUESTIONS IN RELATION TO THE NOTIFICATION LETTER

Should you have any questions in relation to this Notification Letter, please contact RBCIS Customer Support team via this dedicated email address: csmandg@rbc.com

Yours faithfully

Darren Judge

Director, M&G Luxembourg SA Management Company of the UCI Remi Kamiya

Conducting Officer, M&G Luxembourg SA Management Company of the UCI



# **OUTSOURCED ACTIVITIES**

Type of Confidential Information transmitted to Sub-contractors	Country where the Sub-contractors are established	Nature of the outsourced activities
Confidential Information (as defined in the Notification Letter)	Canada India Ireland Luxembourg Malaysia Poland	<ul> <li>Transfer agent/ shareholders services (incl. global reconciliation)</li> </ul>
	United Kingdom	<ul> <li>IT infrastructure (hosting services)</li> <li>IT system management / operation services</li> <li>IT services (incl. development and maintenance services)</li> </ul>
		<ul><li>Reporting</li><li>Investor services activities</li></ul>