

**SEI INVESTMENTS GLOBAL, LIMITED**

**SEI GLOBAL MASTER FUND PLC**

**SEI GLOBAL ASSETS FUND PLC**

**SEI GLOBAL INVESTMENTS FUND PLC**

**SEI GLOBAL INVESTMENTS CCF**

**PRIVACY STATEMENT – INVESTORS AND RELATED PARTIES**

SEI Investments Global, Limited (the “**Management Company**”), solely in its capacity as the alternative investment fund manager of SEI Global Investments CCF (the “**CCF**”), and each investment fund listed in Appendix I hereto (each a “**UCITS Fund**” and together with the CCF, the “**Funds**”), will collect and process the Personal Data (described below) of natural persons who are registered shareholders (“**Investors**”), applicants for shares (“**Applicants**”), beneficial owners of registered Investors and Applicants, personal representatives, financial advisors, directors, officers, employees, agents, trustees and / or authorised signatories of registered Investors and Applicants, and directors (for the purposes of and in connection with the appointment of, and ongoing obligations in relation to, such directors), officers, employees, agents of the Management Company, the relevant Fund or the Fund’s or its Investors’ service providers (“**Individuals**”) and other information relating to the dealings of Individuals with the relevant Fund and / or its service providers. This Privacy Statement explains how the Management Company and each UCITS Fund will manage the Personal Data of Individuals, why the Management Company and each UCITS Fund use it, and how Individuals may contact the Management Company and the relevant UCITS Fund in relation to the use of Personal Data.

**Where the Management Company or a UCITS Fund needs to process Personal Data in connection with a registered Investor’s contract with the relevant Fund or in anticipation of an Applicant becoming a registered Investor, or where the Management Company or a UCITS Fund has a legal obligation to collect certain Personal Data relating to an Individual (for example, in order to comply with anti-money laundering and anti-terrorist financing obligations), the Management Company and the UCITS Fund will not be able to deal with the registered Investor or Applicant if the Individual does not provide the necessary Personal Data and other information required by the Management Company or the UCITS Fund.**

“**Personal Data**” means any information which the Management Company or a UCITS Fund has or obtains, or which an Individual provides to the Management Company, a UCITS Fund or the Fund’s service providers, such as his / her name, address, phone number(s), email address, date and place of birth etc, from which that Individual can be directly or indirectly personally identified, and may include information such as passport, driving licence or other identity card detail and bank or shareholder account numbers, tax and social security identifiers and tax residency information, signature, Share transactions detail and online identifiers. Some of this Personal Data may be sensitive Personal Data, such as data revealing racial or ethnic origin, political opinions, or trade union membership (“**Sensitive Personal Data**”).

**Use of Personal Data and Basis of Processing**

The Management Company and each UCITS Fund will use the Personal Data:

1. for the purposes of performing the contract with a registered Investor, or in anticipation of an Applicant becoming a registered Investor, namely:

- (a) for the purposes of providing services to the registered Investor, and setting up and administering the Applicant's or registered Investor's account(s), as the case may be;
  - (b) for the collection of subscriptions and payment of redemptions, distributions and dividends;
  - (c) to deal with queries or complaints from registered Investors;
2. for compliance with the Management Company's legal obligations regarding the CCF or a UCITS Fund's legal obligations, which may include:
- (a) anti-money laundering and anti-terrorist financing (collectively "**AML**") and fraud prevention purposes, including Office of Foreign Assets Control (OFAC) and Politically Exposed Person (PEP) screening for these purposes and to comply with UN, EU and other applicable sanctions regimes;
  - (b) compliance with applicable tax and regulatory reporting obligations and regulatory approvals, including for the avoidance of doubt approval of directors and / or designated persons by the Central Bank of Ireland;
  - (c) where the Management Company or a UCITS Fund is ordered to disclose information by a court with appropriate jurisdiction;
  - (d) recording of telephone calls and electronic communications in order to comply with applicable law and regulatory obligations;
3. where use is for a legitimate purpose of the Management Company or the UCITS Fund, including:
- (a) for day to day operational and business purposes, including quality control, business and statistical analysis, market research or for tracking fees and costs or for customer service, training and related purposes;
  - (b) to take advice from the Management Company's or the UCITS Fund's external legal or other advisors;
  - (c) board reporting and management purposes, including quality assurance;
  - (d) in the event of a merger or proposed merger of a Fund or any sub-fund of a Fund;
4. where use or sharing is for a legitimate purpose of another company in the SEI group of companies (the "**SEI Group**"), or of a third party to which the Management Company or the UCITS Fund provide the Personal Data, including:
- (a) for day to day operational and business purposes;
  - (b) for pursuing corporate and social responsibility objectives;
  - (c) investor relationship management; and
  - (d) calculation and payment by the recipient of commissions and rebates;
5. where necessary to establish, exercise or defend their legal rights or for the purpose of legal proceedings;

6. where an Individual has consented to use for a particular purpose. If an Individual gives consent for the Management Company or a UCITS Fund to use his / her Personal Data for a particular purpose, that Individual has the right at any time to withdraw consent to the future use of his / her Personal Data for some or all of those purposes by writing to the address specified below:

Neither the Management Company nor a UCITS Fund will disclose any Personal Data to any third party, except as outlined above and / or as follows:

1. to enable the Management Company or the UCITS Fund to carry out the obligations under the contract with a registered Investor or in anticipation of an Applicant becoming a registered Investor;
2. to anyone providing a service to a Fund or acting as the Management Company's or the UCITS Fund's agent (which may include the distributor and any paying or representative agents, the investment manager and companies within their group of companies, the administrator and its or their sub-contractors), as data processors, for the purposes of providing services to the Fund and on the understanding that they will keep the Personal Data confidential;
3. where Personal Data needs to be shared with the depositary appointed to the Fund (the "**Depositary**"), in order to enable it to discharge its legal and regulatory obligations;
4. in limited circumstances, where the administrator to the Fund is subject to a separate legal obligation requiring it to act as controller of the Personal Data, including where it is required to use the Personal Data for the discharge of its own AML obligations, or where an Individual has otherwise consented to the Personal Data being shared with the administrator for specific purposes;
5. where the registered Investor or Applicant is a client of the SEI Group, a third party financial advisor or investment manager, or a company within its or their group of companies, with such company or advisor for the purposes outlined above;
6. where the Management Company or the UCITS Fund needs to share Personal Data with its auditors, and legal and other advisors, or in the case of the Management Company with the auditors of the CCF;
7. in the event of a merger or proposed merger, any (or any proposed) transferee of, or successor in title to, the whole or any part of the Fund's business, and their respective officers, employees, agents and advisers, to the extent necessary to give effect to such merger; or
8. the disclosure is required by law or regulation, or court or administrative order having force of law, or is required to be made to any regulator of the Management Company or a Fund.

Neither the Management Company nor a UCITS Fund will otherwise share Personal Data with any third party unless it receives the prior written consent of the relevant Individual to do so.

### **International Transfers**

Personal Data may be transferred outside the European Economic Area (the "**EEA**") in accordance with an Individual's instructions, where an Individual has explicitly consented, and / or as otherwise required or permitted by law.

Many of the countries to which data will be transferred will be within the EEA, or will be ones which the European Commission has approved, and will have data protection laws which are the same as or broadly equivalent to those in Ireland.

However, some transfers may be to countries which do not have equivalent protections, and in that case the Management Company or a UCITS Fund shall use reasonable efforts to implement contractual protections for the Personal Data. While this will not always be possible where the Management Company or the UCITS Fund is required to transfer the information in order to comply with and perform the contract with an Investor / Applicant or where it has a legal obligation to do so, any transfers will be done in accordance with applicable data protection laws, including through the implementation of appropriate or suitable safeguards in accordance with such applicable data protection laws.

For the avoidance of doubt, safeguards in the form of EU Commission approved standard contractual clauses adopted by the SEI Group or other third party delegates or the EU-US Privacy Shield for transfers to the United States will be implemented where personal data is transferred by a UCITS Fund or the Management Company to a service provider for processing.

### **Sensitive Personal Data**

The Management Company and a UCITS Fund may, in limited circumstances, collect and process Sensitive Personal Data in connection with their obligations under applicable AML laws. Any Sensitive Personal Data will only be used and disclosed, as necessary, for such purpose.

### **Third Party Providers of Information**

The Management Company or a UCITS Fund may obtain Personal Data relating to Individuals from someone other than that Individual. This may include Personal Data relating to beneficial owners, partners, directors, officers, employees, advisors or other related persons of an Investor/Applicant or of the person providing the Personal Data. The Personal Data may be obtained from a variety of sources, such as financial advisors to Investors/Applicants, employers of Individuals, and / or direct and indirect service providers to the relevant Fund, such as vendors providing AML and sanctions-checking databases. The person providing the information will be asked to warrant that it will only do so in accordance with applicable data protection laws, and that it will ensure that before doing so, the Individuals in question are made aware of the fact that the Management Company and the UCITS Fund will hold information relating to them and that it may use it for any of the purposes set out in this Privacy Statement, and where necessary, that it will obtain consent to the Management Company's and the UCITS Fund's use of the information. The Management Company and a UCITS Fund may, where required under applicable law, notify those individuals that they have been provided with their Personal Data and provide a copy of this Privacy Statement to them.

### **Recipient of the Personal Data**

In any case where the Management Company or a UCITS Fund shares Personal Data with a third party data controller (including, as appropriate, other members of the SEI Group and the Fund's service providers), the use by that third party of the Personal Data will be subject to the third party's own privacy policies. In particular, the Depositary may require the Fund's bank statements and information from the Fund's share register in order to complete cash monitoring and other oversight services which could contain Personal Data. In such circumstances, the Depositary is acting as a data controller. The legal basis for the Depositary obtaining such data is to comply with a legal requirement with respect to the performance of its oversight services to the Company.

## **Updates to Personal Data**

The Management Company and each UCITS Fund will use reasonable efforts to keep Personal Data up to date. However, each Individual will need to notify the Management Company and the UCITS Fund without delay in the event of any change in his / her personal circumstances, or those of the others mentioned above, so that the Management Company and the UCITS Fund can keep the Personal Data up to date.

## **Retention of Personal Data**

The Management Company and each UCITS Fund are obliged to retain certain information to ensure accuracy, to help maintain quality of service and for legal, regulatory, fraud prevention and legitimate business purposes.

It is obliged by law to retain AML related identification and transaction records for five years from the end of the relevant investor relationship or the date of the transaction respectively.

Other information will be retained for no longer than is necessary for the purpose for which it was obtained by the Management Company or the UCITS Fund or as required or permitted for legal, regulatory, fraud prevention and legitimate business purposes. In general, the Management Company and each UCITS Fund (or their service providers on its behalf) will hold this information for a period of seven years, unless it is obliged to hold it for a longer period under law or applicable regulations.

The Management Company and each UCITS Fund may also retain records of telephone calls and any electronic communications for a period of five years and, where requested by the Central Bank of Ireland, for a period of up to seven years.

## **An Individual's Rights in relation to Personal Data**

An Individual may at any time request a copy of his / her Personal Data from the Management Company or a UCITS Fund. This right can be exercised by writing to the address specified below.

An Individual also has the right to correct any inaccuracies in, and in certain circumstances, to request erasure or restriction on the use of, his / her Personal Data, and to object to certain uses of his / her Personal Data, in each case subject to the restrictions set out in applicable data protection laws. Further information on these rights, and the circumstances in which they may arise in connection with the Management Company or a Fund's processing of Personal Data can be obtained by writing to the address specified below.

In any case where the Management Company or a UCITS Fund is relying on an Individual's consent to process his / her Personal Data, that Individual has the right to change his / her mind and withdraw consent by writing to the address specified below.

Where the Management Company or a UCITS Fund is relying on a legitimate purpose of the Management Company / UCITS Fund, a member of the SEI Group or a third party recipient of the Personal Data, in order to use and disclose Personal Data, an Individual is entitled to object to such use or disclosure of his / her Personal Data, and if he / she does so, the Management Company / the UCITS Fund will cease to use and process the Personal Data for that purpose unless the Management Company or the relevant UCITS Fund can show there are compelling legitimate reasons for it to continue or they need to use the Personal Data for the purposes of legal claims.

In limited circumstances, an Individual may also have the right to data portability in respect of certain of his / her Personal Data, which means he / she can request that the Management Company or the

UCITS Fund provide it to him / her in a structured, commonly used and machine-readable format, or transmit it to his / her third party nominee where this is technically feasible.

An Individual also has the right to lodge a complaint with the Data Protection Commission about the processing of his / her Personal Data by the Management Company or a UCITS Fund.

### **Contacting the Funds**

Any queries or complaints regarding the use of the Personal Data by the Management Company or a UCITS Fund and / or the exercise of individual rights should be addressed to the Management Company / UCITS Fund at [siglcbi@seic.com](mailto:siglcbi@seic.com).

**Last updated 25 May 2018**

*This information is issued by SEI Investments (Europe) Limited ("SEIL") 1st Floor, Alphabeta, 14-18 Finsbury Square, London EC2A 1BR, United Kingdom. This document and its contents are directed only at persons who have been categorised by SIEL as a Professional Client for the purposes of the FCA Conduct of Business Sourcebook. SIEL is authorised and regulated by the Financial Conduct Authority. Collective investment Schemes (CIS) are generally medium to long-term investments.*

### **Fund Contact Details**

**Manager:** SEI Investments Global Limited ("SIGL"), Styne House, Upper Hatch Street, Dublin 2, Ireland.

**Investment Adviser:** SEI Investments Management Corporation, 1 Freedom Valley Drive, Oaks, Pennsylvania 19456, USA.

**Custodian:** Brown Brothers Harriman Trustee Services (Ireland) Ltd, 30 Herbert Street, Dublin 2, Ireland.

## **Appendix I**

### **List of UCITS Funds**

SEI Global Master Fund plc

SEI Global Assets Fund plc

SEI Global Investment Funds plc