

Last Updated: September 18, 2024

EEA/UK PRIVACY NOTICE

SCOPE

This Privacy Notice provides additional information to data subjects in the United Kingdom (“**UK**”), the European Economic Area (“**EEA**”) and Switzerland and supplements (so should be read alongside) the Privacy Policy.

In line with Conning Holdings Limited’s (“**Conning**”/“**we**”/“**us**”/“**our**” as applicable) commitment to safeguarding the privacy and confidentiality of the personal data you have entrusted to it, we have published and regularly updated this privacy notice, in which we explain the way we collect and process your information provided to us in or from the UK, EEA and Switzerland (the “**EEA/UK Privacy Policy**”). By providing your information to Conning (whether via one of the channels as stipulated under the section “*Collecting Your Information*” of the general [Privacy Policy](#) (the “**General Privacy Policy**”) or otherwise), you acknowledge the processing set out in this EEA/UK Privacy Policy. Further notices highlighting certain uses Conning wishes to make of your Personal Data together with the ability to opt in or out of selected uses may also be provided to you when Conning collects Personal Data from you if and when required under EEA or UK law.

This EEA/UK Privacy Policy should be read together with the General Privacy Policy and intends to supplement the General Privacy Policy of Conning to provide additional information to you in circumstances where we need to process or use any Personal Data (defined below) in or from the EEA, UK or Switzerland. For use or processing of data that is not in or from EEA, UK or Switzerland, please refer to Conning’s other privacy policies/notices.

If you are an existing client, former client, prospect, business partner or vendor (or trustee, officer, owner or employee of an existing client, former client, prospect, business partner or vendor) of Conning, further details about how Conning uses your Personal Data is set out in your investment management agreement or fund subscription documents, marketing materials or other applicable agreements with Conning. Please refer to those applicable agreements instead.

If you have any questions in relation to this EEA/UK Privacy Policy and wish to contact us, please refer to the “*Contact Us*” section below.

PURPOSES AND LAWFUL BASIS FOR PROCESSING

When we use your personal information, we ensure we have a lawful basis to do so. We will generally rely on the one or more of the following lawful bases:

- **Performance of a contract:** this is relevant where we collect and use your personal information where necessary to enter into a contract with you or to perform our obligations under a contract with you.
- **Legitimate interest:** this is relevant where we use your personal information where it is necessary for our legitimate interests and those interests do not override your rights.
- **Compliance with law or regulation:** this is relevant where we use your personal information where it is necessary to comply with applicable laws.
- **Necessity in connection with a legal claim:** this is relevant where your information is necessary for us to defend or make a legal claim.

- **Consent:** As set out below, there are limited circumstances where we will need your consent to process your personal information. In instances where you give your consent for us to process your personal information, you are able to withdraw your consent at any anytime by contacting us at+1 860.299.2020.

In the relevant table below, we have set out the relevant lawful basis that applies to each processing activity for which we use your personal information.

Visitors and users of our Online Resources, Customers, Vendors and Job Applicants

Processing activity	Types of personal information processed	Lawful basis for processing
Correspondence, responding to your inquiries	<ul style="list-style-type: none"> • Name • Email address • Telephone number • Responses to online forms • SMS 	Legitimate interest (to provide our services)
Direct marketing (not applicable to vendors or job applicants)	<ul style="list-style-type: none"> • Name • Email address • Telephone number • Responses to online forms • SMS • Marketing preferences 	In the UK we typically rely on Legitimate interest (to inform you about our products and services offered to businesses) In jurisdictions where consent is required for this type of marketing, we rely on Consent .
Event registration	<ul style="list-style-type: none"> • Name • Postal address • Email address • Telephone number • Responses to online forms • Financial information • SMS 	Contract performance (where you have entered into an agreement to attend our event) Legitimate interest (to provide you with access to our events)
Applications via our website (job applicants only)	<ul style="list-style-type: none"> • Name • Email address • Telephone number • Responses to online forms • Application information including biographical and work experience information and any other data provided in connection with your application 	Legitimate interest (to consider your application)
Improve our website and services	<ul style="list-style-type: none"> • Website usage information (including cookies information, mobile device information, the type of browser and operating system you use, the date and time and length of your visit, the pages visited, graphics viewed and any documents downloaded, links to other sites you accessed from our online and mobile 	Legitimate interest (to improve our website and services)

	<p>resources or used to navigate to our online and mobile resources, IP address browser type and version as more fully detailed in our cookies policy)</p> <ul style="list-style-type: none"> • Responses to online forms 	
Exercise and defense of legal claims	<ul style="list-style-type: none"> • Name • Postal address • Email address • Telephone number • SMS • Website usage information as described above • Where applicable, application information as described above 	<p>Legal obligation (where the processing activity is required by law or regulation)</p> <p>In all other cases, legitimate interests (to comply with our obligations)</p>
To re-organize or make changes to our business	<ul style="list-style-type: none"> • Name • Postal address • Email address • Telephone number • SMS • Marketing preferences • Website usage information as described above • Where applicable, application information as described above 	Legitimate interest (restructuring our business)
Understand our customers and potential customers better and tailor our products and services (not applicable to vendors or job applicants)	<ul style="list-style-type: none"> • Name • Postal address • Email address • Telephone number • SMS • Website usage information as described above (Customers (Global)) 	Legitimate interest (to ensure the quality and legality of Conning's services, to allow Conning to improve its services and to allow Conning to provide you with the content and services on the websites)
<p>To comply with legal or regulatory requirements</p> <p>Conning may process your Personal Data to comply with its regulatory requirements or dialogue with its regulators or defend or prosecute claims as applicable which may include disclosing your Personal Data to third parties, the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world. For example, the transaction and trade reporting Conning needs to undertake in order to comply with Conning's obligations under MiFID II. Where permitted, Conning will direct any such request to you or notify you before</p>	<ul style="list-style-type: none"> • All categories of personal data collected (as outlined above), to the extent relevant 	<p>Legal obligation (to the extent we are legally required to undertake the processing). Otherwise,</p> <p>Legitimate Interest (to cooperate with law enforcement and regulatory authorities)</p>

responding unless to do so would prejudice the prevention or detection of a crime.		
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Additional processing undertaken in respect of customers, only

If you are a customer located in the UK, EEA or Switzerland, we will undertake the following additional processing of your personal data:

Processing activity	Types of personal information processed	Lawful basis for processing
Providing products and services to you and to inform you of any changes	<ul style="list-style-type: none"> Name Postal address Email address Telephone number Financial information Responses to online forms SMS 	<p>Contract performance (where you have entered into an agreement to receive our products and services)</p> <p>In all other cases, legitimate interest (to provide products and services)</p>
Verify your identity, protect against fraud and manage risk	<ul style="list-style-type: none"> Name Postal address Email address Telephone number SMS Information relating to political views 	<p>Legitimate interest (to ensure that you fall within Conning's acceptable risk profile and to assist with the prevention of crime and fraud)</p> <p>When we process special category data, we rely on substantial public interest (prevention of crime)</p>
Monitor certain activities (service quality and compliance with procedures)	<ul style="list-style-type: none"> Name Postal address Email address Telephone number Financial information Responses to online forms SMS 	<p>Legitimate interest (to ensure the quality and legality of Conning's services)</p>

INTERNATIONAL TRANSFERS

As an international company, we may store or transfer your personal information to other Conning entities around the world and particularly to our headquarters located in the USA. Where this is the case, we will ensure that the importing jurisdiction offers an adequate level of data protection, or we will provide the personal information under a comprehensive, flexible, and global compliance framework which implements appropriate measures and safeguards to ensure that your personal information is protected in accordance with applicable data protection laws.

Where we make an international data transfer, we generally will rely on the EU Standard Contractual Clauses (together with the UK International Data Transfer Addendum, where applicable) which include safeguards to provide for an adequate level of data protection unless another safeguard derogation applies.

Please contact us at the details shown below if you would like to see a copy of the specific safeguards applied to the export of your personal information.

RETENTION

Our retention periods for personal information are based on business needs and legal requirements. We will retain your personal information while we are using it, for purposes described above. We may continue to retain it after we have ceased such uses for certain legitimate business purposes.

The length of time for which we will retain your personal information will depend on the purposes for which we need to retain it. After we no longer need to retain your personal information, we will delete it or securely destroy it in accordance with our records retention policy.

YOUR RIGHTS

You have a number of rights in relation to your personal information, which are summarized below.

Access. You have the right to access and receive a copy of your personal information, and other supplementary information.

Rectification. You have the right to have inaccurate personal information rectified or completed if it is incomplete.

Objection. You have the right, when we process personal information on the grounds of legitimate interests, to object to the processing of your personal information for compelling and legitimate reasons relating to your particular situation, except in cases where legal provisions expressly provide for that processing. In addition, you have the right to object at any time where your personal information is processed for direct marketing purposes, please contact us using the details shown below if you would like to do this.

Portability. You have the right to receive your personal information that you have provided to us in a structured, commonly used and machine-readable format and have the right to transmit them to other data controllers without hindrance. This right only exists if the processing is based on your consent or a contract and the processing is carried out by automated means.

Restriction. You may request to restrict processing of your personal information (i) while we verify your request – if you have contested the accuracy of the personal information about you which we hold; (ii) if the processing is unlawful and you oppose the erasure of it and request restriction instead; (iii) if we no longer need it, but you tell us you need it to establish, exercise or defend a legal claim; or (iv) while we verify your request if you have objected to processing based on public or legitimate interest.

Erasure. You may request to erase your personal information if it is no longer necessary for the purposes for which we have collected it, you have withdrawn your consent and no other legal grounds for the processing exist, you objected and no overriding legitimate grounds for the processing exist, the processing is unlawful, or erasure is required to comply with a legal obligation.

Right to refuse or withdraw consent. Please note that in case we ask for your consent to certain processing, you are free to refuse to give consent and you can withdraw your consent at any time without any adverse negative consequences. Please contact us using the details shown below if you would like to withdraw consent to direct marketing.

Right to lodge a complaint. You also have the right to lodge a complaint with a supervisory authority, in the jurisdiction of your residence, or the location where the issue that is the subject of the complaint occurred.

- Details of the UK data protection authority can be found at www.ico.org.uk.
- Details of the applicable data protection supervisory authority for EEA jurisdictions can be found at https://edpb.europa.eu/about-edpb/about-edpb/members_en.
- Our primary EU regulator is:
 Die Bundesbeauftragte für den Datenschutz
 und die Informationsfreiheit
 Husarenstraße 30
 53117 Bonn
 Tel. +49 228 997799 0; +49 228 81995 0
 Fax +49 228 997799 550; +49 228 81995 550
 e-mail: poststelle@bfdi.bund.de
- Details of the Swiss data protection supervisory authority can be found at <https://www.edoeb.admin.ch/edoeb/en/home.html>.

Please note that certain conditions and exemptions apply to the exercise of many of these rights and so you will not be able to exercise them in all situations. However, we will consider and evaluate each request that we receive and respond in accordance with our legal obligations.

Entity name	Address	Data Protection Contact
Conning Asset Management Limited	24 Monument Street, London, EC3R 8AJ, UK	Paul Martindale, Director, Compliance +44 2073 371958 Paul.Martindale@conning.com
Conning (Germany) GmbH	Gertrudenstr. 30-36, 50667 Köln Nordrhein-Westfalen, Germany	Sylvia Carduck, Legal Assistant, Conning +49 221 96750448 sylvia.carduck@conning.com
Conning, Inc.	One Financial Plaza, Hartford, CT 06103, USA	Director, Operational Risk Phil Durosko +1-860-299-2141 phil.durosko@conning.com
Conning & Company	One Financial Plaza, Hartford, CT 06103, USA	Phil Durosko, Operational Risk Phil.durosko@conning.com