

**THE WORLD MARKETS UMBRELLA FUND
PUBLIC LIMITED COMPANY**

DATA PROTECTION NOTICE

The World Markets Umbrella Fund plc (the "Fund")

1. Purpose of Notice

This notice sets out details on how personal information ("**Personal Data**") relating to you, as an individual investor / natural person invested or investing in the Fund or relating to you as a director, officer, employee, authorised signatory and / or beneficial owner of a corporate or other entity invested or investing in the Fund will be handled by the Fund as controller of the Personal Data (as specified in Section 3 below of this notice) and / or handled on the Fund's behalf by its third party service providers as and from 25 May 2018.

2. Personal Data Processed by the Fund

The Fund processes: **(i)** Personal Data provided to it or to its relevant service provider(s) by an investor in the Fund via the completed investor application form; **(ii)** Personal Data that it collects, generates or observes while administering your account or the account of the institutional Fund shareholder of which you are a director, officer, employee, authorised signatory and / or beneficial owner; and **(iii)** other Personal Data you provide to the Fund or to the Fund's third party service providers acting on the Fund's behalf such as AML / KYC information. This information includes:

- a. **Information provided to the Fund by you or by the institutional Fund shareholder of which you are a director, officer, employee, authorised signatory and / or beneficial owner:** this might include your name and address (including proofs of name and address), contact details, date of birth, gender, age, telephone number, email address, fax number, nationality, citizenship status, country of residence, bank details, financial information, national identification number, social security number, investment history, tax residency and tax identification number.
- b. **Information that the Fund collects, generates or observes:** this might include information relating to your investment in the Fund or to the investment made in the Fund by the shareholder of which you are a director, officer, employee, authorised signatory and / or beneficial owner; emails; recordings of telephone calls and website usage data.
- c. **Information that the Fund obtains from third party sources:** This might include information obtained for the purpose of the Fund's AML / KYC procedures, information from public websites, social media and information received from your advisers or from intermediaries. Such third parties include:

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| <ul style="list-style-type: none">• 192.com• Companies House |
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Sixth Floor, 2 Grand Canal Square, Dublin 2, Ireland

Directors: Patricia Taylor, Kevin Molony, Josephine Kitcher (UK), Mark Dwyer (UK)

An umbrella investment company with variable capital and having segregated liability between its sub-funds.

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3. Why the Fund Processes your Personal Data

The Fund collects and processes your Personal Data on various legal bases and for different purposes, including those set out below.

Legal Basis	Purpose(s)
<p>Performance of a Contract The Fund must process your Personal Data in order to enter into and perform its contract with you as an individual / natural person investing in the Fund.</p>	<ul style="list-style-type: none"> • to assess the initial application for shares and to facilitate the opening of your account with the Fund. • to facilitate the management and administration of your holdings and dealings in the Fund including, without limitation, the processing of redemption, conversion, transfer and additional subscription requests, manual and STP dealing activities, switches / exchanges, pricing, swing price notifications, cash-flow notification, settlement of contracts, dividends / distributions, bank account reconciliations, debtor / creditor monitoring, shareholder register maintenance and re-registrations, the calculation and processing of fees including retrocession, rebates, renewal commissions and performance fees, the calculation and payment of distributions and the processing and verification of instructions.
<p>Legitimate Interests The Fund may process your Personal Data in order to exercise or preserve its legitimate business interest(s).</p>	<ul style="list-style-type: none"> • to make relevant disclosures in the course of a merger, acquisition or bankruptcy of the Fund or any sub-fund. • to validate and verify information for security purposes, including for the prevention of fraud. • to manage the Fund, including monitoring and resolving complaints. • to send administrative information relevant to the investment in the Fund including without limitation trade confirmation, contract notes, statements and shareholder notifications and mailings. • to exercise or defend a legal claim, including in the context of litigation, arbitration and similar proceedings. • to ensure client service delivery management including but not limited to client reporting, audit support, due diligence visits, service delivery management and to effect change management including project delivery. • <i>For directors, officers, employees, authorised signatories and / or beneficial owners of institutional investors in the Fund:</i> to assess the initial application for shares and to facilitate the opening of the account with the Fund and management and administration of holdings and dealings in the Fund.
<p>Compliance with Legal Obligation The Fund may process your Personal Data in order to comply with its relevant legal and regulatory obligations.</p>	<ul style="list-style-type: none"> • to ensure compliance with the Fund's business, tax and regulatory obligations, including its FATCA/CRS reporting obligations, trustee reporting, client share asset reporting, MI reporting and data extracts. • to assist the Fund's auditors in the auditing of the Fund in accordance with its legal obligations. • to investigate, detect, prevent or prosecute crimes in relation to the prevention of fraud, money laundering and/or terrorist financing, including "know your customer"

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	and other necessary onboarding and ongoing investor checks.
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4. Third Party Recipients of your Personal Data

The Fund may disclose your Personal Data to its relevant service providers and/or other third parties including potentially:

- the Administrator, currently BNY Mellon Fund Services (Ireland) Designated Activity Company
- the Depositary, currently BNY Mellon Trust Company (Ireland) Limited
- Auditors, currently KPMG Chartered Accountants
- Its Legal Advisors, currently William Fry
- the Company Secretary, currently Wilton Secretarial Limited
- the Investment Manager, currently City of London Investment Management Company Limited
- the Italian Paying Agent, currently State Street Bank International GMBH Succursale Italia
- the Irish Revenue and other national revenue authorities;
- national regulators, including the Central Bank of Ireland; and
- An Garda Síochána.

The Fund or its service providers may also disclose your Personal Data to any other persons or entities as agreed between the Fund and the relevant service provider, or as may be required or expressly permitted by applicable laws.

5. International Transfer of your Personal Data

The disclosure of your Personal Data to the third party recipients set out above may involve the transfer of your Personal Data to the USA, India and other jurisdictions outside the European Economic Area ("**EEA**"), which are not the subject of an adequacy decision by the EU Commission. Such countries may not be subject to equivalent data protection laws as countries within the EEA. Any transfer of your Personal Data to jurisdictions outside the EEA may only occur in accordance with the requirements of the GDPR. For example, in connection with the transfer of your Personal Data to jurisdictions outside the EEA, the Fund has authorised the Administrator as its delegate to enter into standard contractual clauses, as prescribed under the GDPR, with relevant parties to whom your Personal Data will be transferred.

6. Retention of your Personal Data

The Fund and the Administrator will retain Personal Data for as long as necessary or permitted in light of the purpose(s) for which it was obtained. The criteria used to determine the retention periods include:

- the length of the Fund's relationship with you / its client;
- whether there is a legal obligation to which the Fund is subject (such as retaining Personal Data obtained for the performance of AML and related checks, which will be kept for **5 years** after termination of the relationship) ; and
- whether retention is advisable in light of the Fund's legal position (such as with respect to statutes of limitations, litigation or regulatory investigations), in which case the Personal Data may be kept for up to **7 years**.

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7. Your Data Protection Rights

You have a number of rights in relation to your Personal Data, which are set out in the table below. **In particular these rights include the right to object to processing of your Personal Data where that processing is carried out for the Fund's legitimate interests.** Note that in certain circumstances these rights might not be absolute.

Right	Further Information
Right of Access	You have the right to request a copy of the Personal Data held by the Fund about you and to access the information which the Fund holds about you. The Fund may charge you for making such an access request where it feels your request is unjustified or excessive.
Right to Object	You have a right to object at any time to the processing of your Personal Data where the Fund processes your Personal Data on the legal basis of pursuing the Fund's legitimate interests.
Right to Rectification	You have the right to have any inaccurate Personal Data which the Fund holds about you updated or corrected.
Right to Erasure	In certain circumstances, you may also have your Personal Data deleted, for example if you exercise your right to object (see above) and the Fund does not have an overriding reason to process your Personal Data or if the Fund no longer requires your Personal Data for the purposes as set out in this notice.
Right to Restriction of Processing	You have the right to ask the Fund to restrict processing your Personal Data in certain cases, including if you believe that the Personal Data the Fund holds about you is inaccurate or the Fund's use of your information is unlawful. If you validly exercise this right, the Fund will store your Personal Data and will not carry out any other processing until the issue is resolved.
Right to Data Portability	You may request the Fund to provide you with your Personal Data which you have given the Fund in a structured, commonly used and machine-readable format and you may request the Fund to transmit your Personal Data directly to another data controller where this is technically feasible. This right only arises where: (1) the Fund processes your Personal Data with your consent or where it is necessary to perform the Fund's contract with you; and (2) the processing is carried out by automated means.

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Where the Fund or the Administrator requires your Personal Data to comply with anti-money laundering or other relevant legal requirements, failure to provide this information may prevent your application for initial subscription of shares / any other dealings in shares in the Fund.

Should you consider that the processing of your Personal Data by the Fund or its service providers infringes the provisions of the GDPR, you may lodge a complaint with a supervisory authority in the EU Member State of your habitual residence, place of work, or in the place of an alleged infringement.

8. Contact Us

If you have any questions in relation to the Fund's use of your Personal Data, or would like to submit a request with respect to your rights above, please contact us at colta@bnymellon.com and +353 1 448 5033.

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