

Privacy Notice

LAST UPDATED: May 2019 (new Addendum added January 2021)

1. Purpose of Notice

In accordance with Regulation (EU) 2016/679 of 27 April 2016, this notice sets out details about how Natixis Investment Managers S.A. ("**Natixis IM**", "**we**", "**us**", or "**our**"), in our capacity as a 'data controller' may collect and/or process personally identifying information relating to you ("**Personal Data**").

2. Personal Data Processed by Natixis IM

Natixis IM processes Personal Data only where it has a lawful basis to do so and only collects Personal Data from you directly as the data subject, from its direct affiliates, or from online databases or other publicly available sources of information, in support of this lawful basis. The amount and type of Personal Data collected and/or processed will vary depending upon the status of our current relationship with you and the information that you have chosen to provide to the Natixis IM group of companies. It may include details such as your name and address, gender, nationality, occupational history, job title, contact information such as your email address and phone number, and similar types of identifying data.

3. Why Natixis IM Processes your Personal Data

Natixis IM collects and processes your Personal Data in order to exercise or preserve its legitimate business interest(s) and to fulfil its legal and regulatory obligations as a regulated financial services firm. This means that Natixis IM may use your Personal Data for the following purposes:

- to inform you, in the framework of ordinary commercial relationships, about products or services similar to those related to your professional interests, or which we otherwise believe you may be interested in based on our prior interactions with you and/or our pre-existing business or personal relationship(s) with you. We may utilize analytics about previous interactions with our marketing materials to help us better identify the above.
- to contact you about events, conferences or seminars organized and/or sponsored by us or one of our affiliated companies;

The provision of your Personal Data to Natixis IM for the purposes described above is entirely discretionary. However please note that a lack of data can be an impediment to the exchange of information necessary for the above purposes.

Natixis IM may also be required to process your Personal Data where it is necessary in order to perform a contract with you. Notably we may need to collect Personal Data in this context to fulfil our legal obligations with respect to anti-money laundering laws and regulations. In such case, please keep in mind that this notice should be read in conjunction with any other applicable policies, terms, conditions, or contractual arrangements in place between you and Natixis IM. Failure to provide us with the requested Personal Data under these circumstances may result in our inability to provide you with the requested products or services.

4. Lawful basis Natixis IM relies upon for processing your Personal Data

For the specific purposes outlined above in section 3, Natixis IM uses your Personal Data because it is necessary for its legitimate interests and such use is not likely to result in unwarranted harm or distress to you, the Data Subject. Natixis IM completed a legitimate interest assessment related to its marketing activities, which is available upon request from Natixis IM's Data Protection Officer whose contact details are available below. You can update your subscription and contact preferences at any time by

following the instructions contained in any marketing communications you may receive from us, by contacting your relationship manager, or by contacting our Data Protection Officer at the contact details provided below.

5. Other Recipients of your Personal Data

We may transfer Personal Data between our Natixis Investment Managers affiliates, if it is necessary to do so for the purposes stated above. We take appropriate and reasonable steps to ensure that only those employees and local offices of Natixis IM that have a legitimate business need for Personal Data are given access to that information. We also maintain appropriate business and technical controls, including physical, electronic and procedural safeguards that comply with the appropriate local laws, to protect your Personal Data. For example, we take precautions to help keep our information systems secure, including the use of firewalls for our Internet-based systems. We also use encryption technologies, user authentication systems and access control mechanisms.

Natixis IM only provides your Personal Data to third parties under the following specific circumstances: (i) if we are required to do so by law, (ii) to fulfil a contract with you, (iii) at your specific request (provided such request does not violate applicable laws or regulations), (iv) with your prior consent, or (v) under certain circumstances, as further described in the next paragraph.

Natixis IM utilizes third party service providers for purposes of conducting our ongoing business and as a result, Natixis IM may need to provide your Personal Data to our third party service providers for the purposes described above. These categories of third party service providers may include:

- Software providers
- Event planners
- IT service providers

Natixis IM ensures that any such data transfers are made in accordance with the requirements of applicable laws and regulations on the protection of personal data and privacy - in particular, Regulation (EU) 2016/679 of 27 April 2016, which is commonly referred to as the "General Data Protection Regulation" or "GDPR". We ensure your Personal Data is subject to a similar level of protection – namely, on the basis of adequate contractual arrangements.

6. International Transfer of your Personal Data

Due to the nature of our business infrastructure your data will be transferred across national borders. This may include the transfer of your Personal Data to jurisdictions whose national data privacy laws do not provide the same level of protection as the data privacy laws of the country in which you work or live. Where Data is transferred to such countries, Natixis IM will base its transfer:

- on one of the binding legal assurances provided for by applicable national data privacy regulations:
 - EG: The signing of contractual clauses of a type approved by the European Commission whereby the recipient of your Data guarantees the protection of your Data to a sufficiently high standard,
- on one of the relevant exemptions for specific transfer situations, as provided for under applicable national data privacy regulations:
 - EG: The transfer of Data to the authorities in accordance with our legal and regulatory obligations or to protect Natixis IM vital interest in the case of an emergency.

To obtain more information about the basis upon which Natixis IM is making these data transfers, you may contact our Data Protection Officer (see below section 9 for the contact details).

7. Retention of your Personal Data

Your Personal Data will not be retained for a period longer than necessary for the purposes of the data processing (as described above), subject to any statutory limitation periods set out under applicable laws and regulations. The criteria used to determine the retention periods includes the length and nature of your relationship with us. Natixis IM will not retain your Personal Data for longer than necessary or permitted, in light of the purpose(s) for which it was obtained.

8. 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 Natixis IM'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 your Personal Data held (either directly or indirectly) by Natixis IM and to access the information that Natixis IM holds about you (either directly or indirectly), free of any charges. However, if such request is unreasonable or excessive, Natixis IM reserves the right to charge you for making such an access request.
Right to Object	You have a right to object at any time to the processing of your Personal Data where Natixis IM 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 Natixis IM 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 Natixis IM does not have an overriding reason to process your Personal Data or if Natixis IM 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 Natixis IM to restrict processing your Personal Data in certain cases, including if you believe that the Personal Data Natixis IM holds about you is inaccurate or that Natixis IM's use of your information is unlawful. If you validly exercise this right, Natixis IM will not carry out any other processing activities with respect to your Personal Data unless and until the issue is resolved.
Right to Data Portability	You may request Natixis IM to provide you with your Personal Data which you have given us in a structured, commonly used and machine-readable format and you may request Natixis IM to transmit your Personal Data directly to another data controller where this is technically feasible. This right only arises where: (1) Natixis IM processes your Personal Data with your consent or where it is necessary to perform a contract with you; and (2) the processing is carried out by automated means.

9. Contact Details - Data Protection Officer

We have appointed a global data protection officer (“DPO”) for the Natixis Investment Managers group of companies. If you have any questions in relation to Natixis IM's use of your Personal Data as described in this notice, or if you would like to submit a request with respect to your rights outlined above, please contact our DPO.

Email address: dpo-natixisim@natixis.com.

Phone number: +33 1 78 40 90 00

Mailing address: Natixis Investment Managers
Attn: Data Protection Officer
43 Avenue Pierre Mendes
75648 Paris Cedex 13 France

If you are not happy with how we are treating your Personal Data for any reason, we strongly encourage you to contact our DPO to discuss these concerns. Our DPO will ensure your inquiry is addressed promptly by the appropriate parties. Please note you also have the right to lodge a complaint with a competent supervisory authority (e.g., in the EU Member State of your habitual residence or place of work, in the place where an alleged infringement occurred, or in those countries where a member of the Natixis IM group of companies is registered with the national data protection authority).

More information about this topic is available on the European Commission's website: https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens/redress/what-are-data-protection-authorities-dpas-and-how-do-i-contact-them_en.

This addendum to Natixis Investment Managers' current Privacy Notice(s) (the "Addendum") contains important new information about your personal data, including an explanation of your rights under applicable data protection laws. **Please read it carefully.**

1. Purpose of the Addendum

Natixis Investment Managers is sending you this Addendum in accordance with Regulation (EU) 2016/679 of 27 April 2016 (commonly referred to as "**GDPR**"), in order to provide you with updated information about how Natixis Investment Managers ("**Natixis IM**", "**we**", "**us**", or "**our**"), in our capacity as a 'data controller', intends to process certain types of personally identifying information relating to you ("**Personal Data**") for the New Purpose described below.

2. Information about Current Data Processing Activities

As a reminder, Natixis IM presently collects and processes certain categories of your Personal Data in order to exercise or preserve its legitimate business interest(s) and to fulfil its legal and regulatory obligations as a regulated financial services firm. Our current Privacy Notice(s), which describe in detail these ongoing data processing activities, are available by clicking [here](#) and/or by navigating to your appropriate country website within im.natixis.com. This Addendum is intended to supplement our current Privacy Notice(s) only, and is not intended to change or replace the content of Natixis IM's existing Privacy Notice(s) in any way.

3. New Purpose

In light of the announcement by Natixis IM and H2O AM ("**H2O**") of the transition of the primary global distributor and referral agent role with respect to all of H2O's financial products and investment management services (collectively, the "**H2O Products**") by Natixis IM to H2O, Natixis IM will need to provide certain categories of your Personal Data, as detailed below, directly to H2O. In order for Natixis IM's clients and distribution partners ("**Natixis IM Clients**") to continue distributing H2O Products, and continue servicing their own underlying clients who are currently invested in the H2O products, Natixis IM Clients may need to consider entering into a direct contractual relationship with H2O, once the transition process has concluded. In order to make this transition process as smooth as possible for Natixis IM Clients, we would like to help facilitate Natixis IM Clients' implementation of a new contract directly with H2O (the "**New Purpose**").

4. New Type of Processing Activity; Categories of Personal Data Involved

To fulfil the New Purpose described above, Natixis IM will need to provide certain categories of your Personal Data directly to H2O, by engaging in a cross-border transfer of this Personal Data to H2O. The categories of Personal Data being transferred to H2O include:

- Your full name and your job title
- A brief description of your current role
- Your business email address(es)
- Your business phone number(s)

5. Lawful Basis for the New Type of Processing

For the specific New Purpose outlined above in section 3, Natixis IM will use and process the types of Personal Data outlined above in section 4, because it is necessary in order to exercise or preserve our legitimate business interest(s), and such use is not likely to result in unwarranted harm or distress to you, the Data Subject. In accordance with GDPR, Natixis IM completed a legitimate interest assessment related

to the New Purpose described above. If you would like further detail about this analysis, please contact our Data Protection Officer at the contact details provided below.

6. Recipients of your Personal Data and International Transfers

In connection with the New Purpose, we will transfer your Personal Data to H2O AM, which may include its subsidiaries. Natixis IM ensures that any such Data transfers are made in accordance with the requirements of applicable laws and regulations on the protection of personal data and privacy. We also maintain appropriate business and technical controls, including physical, electronic and procedural safeguards that comply with the appropriate local laws, to protect your Personal Data. For example, we take precautions to help keep our information and email systems secure, including the use of firewalls for our Internet-based systems. We also use encryption technologies, user authentication systems and access control mechanisms.

This transfer of Personal Data to H2O for the New Purpose described above involves the **cross-border transfer** of your personal data to jurisdictions located outside of the European Union – namely, the UK. Such transfers will comply with all applicable data protection laws, including but not limited to GDPR. If you would like more information about the basis upon which Natixis IM is making these cross-border Data transfers, please contact our Data Protection Officer.

7. Retention of your Personal Data

Your Personal Data will not be retained for a period longer than necessary for the purposes of the data processing (these purposes include the New Purpose described above, as well as the purposes described in our current Privacy Notice(s)), subject to any statutory limitation periods set out under applicable laws and regulations. The criteria used to determine the retention periods includes the length and nature of your relationship with us. Natixis IM will not retain your Personal Data for longer than necessary or permitted, in light of the purpose(s) for which it was obtained.

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Right to Rectification	You have the right to have any inaccurate Personal Data which Natixis IM 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 Natixis IM does not have an overriding reason to process your Personal Data or if Natixis IM no longer requires your Personal Data for the purposes as set out in this Addendum (or any of our other Privacy Notice(s) that are applicable to you).

Right	Further Information
Right to Restriction of Processing	You have the right to ask Natixis IM to restrict processing your Personal Data in certain cases, including if you believe that the Personal Data Natixis IM holds about you is inaccurate or that Natixis IM's use of your information is unlawful. If you validly exercise this right, Natixis IM will not carry out any other processing activities with respect to your Personal Data unless and until the issue is resolved.
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We have appointed a global data protection officer (“DPO”) for the Natixis Investment Managers group of companies. If you have any questions in relation to Natixis IM’s use of your Personal Data as described in this Addendum, or if you would like to submit a request with respect to your rights outlined above, please contact our DPO at the information provided below.

Email address: dpo-natixisim@natixis.com.

Phone number: +33 1 78 40 90 00

Mailing address: Natixis Investment Managers
Attn: Data Protection Officer
43 Avenue Pierre Mendes
75648 Paris Cedex 13 France

If you have concerns with how we are treating your Personal Data, we strongly encourage you to contact our DPO to discuss these concerns. Our DPO will ensure your inquiry is addressed promptly by the appropriate parties.

You also have the right to lodge a complaint with a competent supervisory authority (e.g., in the EU Member State of your habitual residence or place of work, in the jurisdiction where an alleged infringement occurred, or in those countries where a member of the Natixis IM group of companies is registered with the national data protection authority, such as Luxembourg or France).

More information about this topic is also available on the European Commission’s website: https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens/redress/what-are-data-protection-authorities-dpas-and-how-do-i-contact-them_en.