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**DATA PROTECTION INFORMATION FOR INVESTORS OF  
DEUTSCHE ZINSHAUS LUX S.à r.l.**

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**1. Responsible according to Data Protection Act**

Deutsche Zinshaus Lux S.à r.l.  
1c, rue Gabriel Lippmann, L-5365 Munsbach  
Tel. +352 28 80 02 97  
E-Mail: [cm@deutsche-zinshaus.lu](mailto:cm@deutsche-zinshaus.lu)

The responsible company (hereinafter “we“ or “us“) is represented by its Management Board.

**2. Responsible for Data Protection**

Deutsche Zinshaus Lux S.à r.l.  
Mr. Harald Strelen  
1c, rue Gabriel Lippmann, L-5365 Munsbach  
Tel. +352 28 80 02 97  
Email: [hs@deutsche-zinshaus.lu](mailto:hs@deutsche-zinshaus.lu)

**3. Categories of data we process and sources of the data**

We process the following personal data:

- person master data (e.g. salutation, title, first name, surname);
- contact data (e.g. address, email address, telephone number, fax number)

as well as

- company details (e.g. company’s designation and address);
- any additional information needed for an adequate service.

In case we did not receive this data from the affected persons themselves, we received it from our investors. Should we receive data from other sources, we will separately inform you about it, if and as far as we are not exempt due to legal regulations.

Deutsche Zinshaus SCS, SICAV-FIS  
(société en commandite simple)  
1c, rue Gabriel Lippmann  
L-5365 Munsbach  
Luxembourg

Deutsche Zinshaus Lux S.à r.l.  
Management Board:  
Christian Motter, Harald Strelen, Mario Warny

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E [info@deutsche-zinshaus.lu](mailto:info@deutsche-zinshaus.lu)  
[www.deutsche-zinshaus.lu](http://www.deutsche-zinshaus.lu)

Date: 26.02.2019

Commercial Register:  
R.C.S. Luxembourg B 161 614  
USt-IdNr. LU25016272

Hauck & Aufhäuser Privatbankiers KGaA,  
Niederlassung Luxemburg  
IBAN: LU34 0620 0810 3200 0EUR  
BIC: HAUKLULL

#### **4. Purposes for processing of personal data**

We process personal data for purposes of

- fulfilment of our obligations under the terms of the money laundering act (in particular identification, risk assessment);
- execution and settlement of the service relationship including;
- fulfilment of our contractual and legal obligations;
- invoicing;
- processing of mutual claims arising from and in connection with the investment relationship (e.g. interest distributions);
- marketing and sales (e.g. sending publications such as information letters/newsletters or press releases, invitations to and holding of seminars or other events, general investor base maintenance).

#### **5. Legal bases of our data processing**

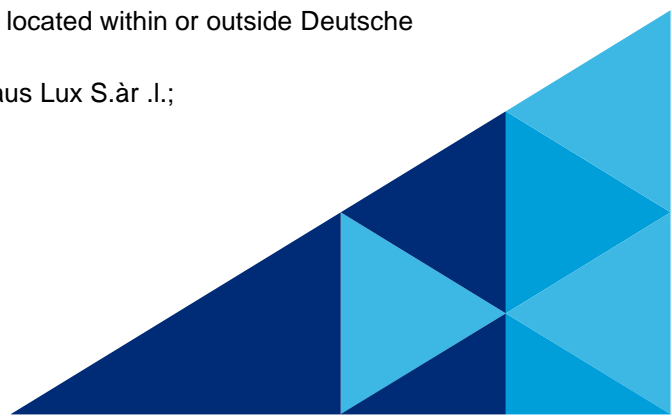
The legal bases for our data processing are

- Art. 6 (1) lit b) GDPR;
- Art. 6 (1) lit c) GDPR for the fulfilment of the legal professional duties we underlie;
- Art. 6 (1) lit. f) GDPR, insofar as the data processing is required to protect our legitimate interests or those of a third party (e.g. for communication with our investors' interlocutors or self-advertising, as long as not covered by Art. 6 (1) lit. a) GDPR and you do not exercise your right of objection according to Art. 21 GDPR, or for the fulfilment of our duties out of the mandate relationship, insofar as not covered by Art. 6 (1) lit. b) GDPR
- Art 6 (1) lit. a) GDPR, insofar as you agreed to the processing of your personal data for certain purposes (e.g. agreement to the mailing of publications).

#### **6. Data recipients**

We transmit personal data to the following recipients in the framework of our business:

- investors
- public authorities, such as fiscal authorities, courts, social insurance agencies, supervisory bodies, enforcement agencies;
- publishing house Bundesanzeiger Verlag GmbH;
- banks, insurance companies, employers' liability insurance associations;
- internal offices that are involved in the implementation of our mandate relationships (e.g. IT & Security);
- contractors (such as IT service providers who may be located within or outside Deutsche Zinshaus Lux S.à r.l.);
- other departments and offices within Deutsche Zinshaus Lux S.à r.l.;



- other Zinshaus companies in accordance with a separately given consent to the transmission and central storage of data;
- depending on the mission and other recipients after consultation with our investors or the person concerned.

## **7. Transmission of personal data into third-party countries**

Data will only be transferred to third-party countries (countries outside the European Union and the European Economic Area - EEA) if this is necessary to fulfil the contract (e.g. payment orders), for internal communication or administration, if you have given us your consent or if this is otherwise legally permissible. In this case, the data transfer always takes place after detailed examination and evaluation by our data protection officer and also only if the office in the third country has an adequate level of data protection or if there are suitable guarantees to ensure an adequate level of data protection (Art. 45 ff GDPR) or in exceptional cases neither an adequacy decision nor suitable guarantees are required (Art. 49 GDPR). If and to the extent that you would like to receive further information on the guarantees in individual cases, you are welcome to contact our data protection officer mentioned under point 2.

## **8. Storage duration of personal data**

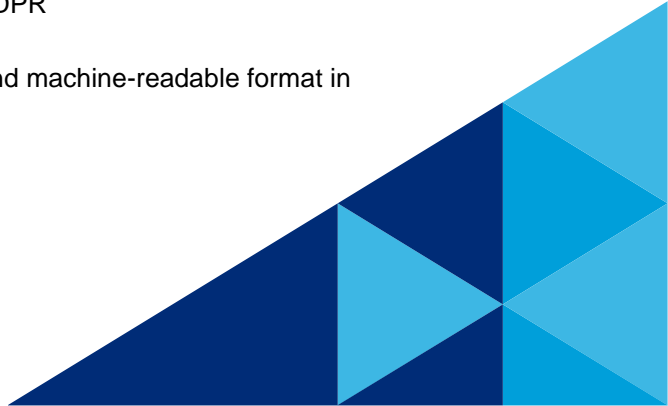
The personal data collected by us will only be stored for as long as is necessary for the fulfilment of the purpose associated with the storage (e.g. mandate support) or for the safeguarding of legitimate storage reasons or obligations. For example, the data is stored for the duration of the statutory retention periods. As a rule, these are 10 years plus a waiting period of further 2 years in order to record cases of a possible suspension of expiry. In the latter case, the data will only be processed to a limited extent, i.e. only to fulfil the reason for retention or the storage obligation and otherwise only with consent, to assert, exercise or defend legal claims, to protect the rights of another natural or legal person or for reasons of an important public interest of the European Union (EU) or an EU member state. If there is a retention obligation, we delete or anonymise the data after the retention obligation has ceased to apply.

## **9. Rights of affected persons**

„Affected persons“, whose data we process, are entitled to the rights stipulated under Art. 15 to 21 GDPR as well as to the right to revoke their consent at any time and to the right to file a complaint with the supervisory authority. These rights can be asserted against us in any form, either directly by using the contact data specified under item 1 or by involving our data protection officer, whose contact data is specified under item 2 above. With the exception of possible transmission or connection fees, the persons concerned do not incur any costs.

- Right to information pursuant to Art. 15 GDPR
- Right to rectification under Art. 16 GDPR
- Right to erasure ('right to be forgotten') pursuant to Art. 17 GDPR
- Right to limitation of processing pursuant to Art. 18 GDPR
- Right to information under Art. 19 GDPR
- Right to transfer your data in a structured, common and machine-readable format in accordance with Art. 20 GDPR
- Right of objection according to Art. 21 GDPR

Discover potential.  
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## **10. Right of revocation of the data processing**

If and to the extent that you have given us your consent to process data, the persons concerned have the right to revoke this consent at any time for the future. The revocation does not affect the lawfulness of the processing carried out on the basis of the consent up to the time of the revocation; rather, the revocation can only "affect the lawfulness of future processing".

If we process personal data to safeguard legitimate interests within the meaning of Art. 6 para. 1 lit. f) GDPR, data subjects have the right under Art. 21 para. 1 GDPR to object to such processing for reasons arising from their particular situation. Data subjects may object to processing for the purposes of direct marketing at any time without stating a reason pursuant to Art. 21 para. 2 GDPR. In order to exercise the right of objection, an informal notification to us (e.g. by e-mail to [cm@deutsche-zinshaus.lu](mailto:cm@deutsche-zinshaus.lu)) stating which data processing is objected to is sufficient.

## **11. No providing requirement**

As a matter of principle, there is no legal requirement according to which a person provides us with your personal data. If, however, we are not provided with the required data, this may result in us not being able to fulfil our obligations under the mandate relationship or not being able to do so in full.

## **12. Legal status**

This data protection information corresponds to the legal status of the date mentioned at the beginning.

