



Privacy Notice

December 2020

“Arrowstreet,” “we”, “us” and “our” means **Arrowstreet Capital Europe Limited**.

About this privacy notice

Arrowstreet is a controller in respect of your personal data and responsible for ensuring that it uses your personal data in compliance with applicable data protection law, including but not limited to the General Data Protection Regulation 2016/679 (“**GDPR**”) and the Data Protection Act 2018.

This Privacy Notice applies if you are a client or prospective client of Arrowstreet and sets out the basis on which any personal data about you that you provide to us, that we create, or that we obtain about you from other sources, will be processed by us.

Personal data that we collect about you

We will collect and process the following personal data about you:

- > **Information that you provide to us or one of our affiliates.** This includes information about you that you provide us by communicating with us, whether face-to-face, by phone, e-mail or otherwise. This information may include:
 - your full name, business address, email address, and telephone number
- > **Information we collect or generate about you includes:**
 - your full name, title, business address, company affiliation, email address, email communications, telephone number, and notes on our communications with you
- > **Information we obtain from other sources.**
 - Due diligence checks on authorized signers and signatories
 - The privacy notice provided by the service provider conducting such due diligence checks can be found here:

[Service Provider Privacy Notice Link](#)

Uses of your personal data

Your personal data may be stored and processed by Arrowstreet in the following ways and for the following purposes:

- > Contact information, emails, and notes on communications to contact you in connection to providing services under any investment management or subscription agreement
- > Contacting you in order to advise you of other products and services, unless you have indicated otherwise
- > Performing due diligence checks
- > Performing client reporting in connection to services under any investment management or subscription agreement

We are entitled to use your personal data in these ways because:

- > Arrowstreet is performing services under our applicable investment management or subscription agreement;
- > Arrowstreet must comply with its regulatory and legal obligations with respect to Anti-Money Laundering and other applicable laws and regulations;
- > we may need to in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings; or
- > the use of your personal data as described is necessary for our legitimate business interests (or the legitimate interests of one or more of our affiliates), such as:
 - matters related to servicing your account or accounts or in connection to any contractual agreement Arrowstreet has with you;
 - contacting you regarding additional products or services Arrowstreet offers.

Disclosure of your information to third parties

We may disclose your personal data to our affiliates in the circumstances described below:

- > Arrowstreet Capital, Limited Partnership may access your personal data in connection to serving you through the Arrowstreet Capital, Limited Partnership office;
- > Types of personal data accessed include:
 - name and contact information, emails, notes on communications, and due diligence checks

We will take steps to ensure that the personal data is accessed only by employees of such affiliates that have a need to do so for the purposes described in this notice.

We may also share your personal data outside of Arrowstreet and our affiliates:

- > to third party agents or contractors (for example, the providers of our electronic data storage services) for the purposes of providing services to us. These third parties will be subject to confidentiality requirements and they will only use your personal data as described in this privacy notice; and
- > to the extent required by law, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation, establish, exercise or defend our legal rights.

Transfers of personal data outside the European Economic Area

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside of the EEA who work for our affiliates or for one of our service providers.

Where we transfer your personal data outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA. This can be done in a number of ways, for instance:

- > the country that we send the data to might be approved by the European Commission;
- > the recipient has signed a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal data, in addition to other related steps as may be required by other applicable laws.

In other circumstances the law may permit us to otherwise transfer your personal data outside the EEA. In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA (including a copy of the standard data protection clauses, as applicable, which we have entered into with recipients of your personal data) by contacting us in accordance with the “Contacting us” section below.

Retention of personal data

How long we hold your personal data for will vary. The retention period will be determined by various criteria including:

- > the purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose; and
- > legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data.

Your rights

You have a number of legal rights in relation to the personal data that we hold about you. These rights include:

- > the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- > the right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so;
- > in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us;
- > the right to request that we rectify your personal data if it is inaccurate or incomplete;
- > the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it;
- > the right to object to, and the right to request that we restrict, our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally entitled to continue processing your personal data and / or to refuse that request; and
- > the right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out in the “Contacting us” section below.

You can find out more information about your rights by contacting the Information Commissioner’s Office, or by searching their website at <https://ico.org.uk/>.



Contacting us

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed above, please address questions, comments and requests to GDPRArrowstreet@arrowstreetcapital.com.



Important Disclosures

These materials are being provided by Arrowstreet Capital, Limited Partnership (we, us, our, Arrowstreet), or on its behalf by Arrowstreet Capital Europe Limited (Arrowstreet Europe), as a general overview of the firm and its investment advisory services, strategies and capabilities, as applicable. These materials are solely for the benefit of select, qualified institutional investors for educational, informational and discussion purposes only. References to "Arrowstreet" or the "firm" and the other information provided herein (e.g. assets under management, representative clients, investment philosophy) refer to Arrowstreet Capital, Limited Partnership unless otherwise noted.

Arrowstreet is a registered investment adviser with the United States Securities and Exchange Commission (SEC), and as a Commodity Trading Advisor and Commodity Pool Operator with the U.S. Commodity Futures Trading Commission (CFTC) and is a member of the National Futures Association (NFA), an industry self-regulatory organization. Arrowstreet is also registered as a Portfolio Manager and Exempt Market Dealer under with the Ontario Securities Commission and other relevant provincial authorities and is an appointed corporate authorised representative (Number: 001282039) of Evolution Trustees Limited (ACN: 611 839 519, AFSL: 486217), authorised for the purposes of the *Corporations Act 2001* (Cth) (Corporations Act) to provide certain financial services to wholesale clients in Australia. Arrowstreet Europe is registered in England, company number 07233286 and is authorized and regulated in the United Kingdom by the Financial Conduct Authority. Registration as an investment adviser under applicable SEC rules and regulations (or registration or licensing with any other regulatory authority) does not imply any level of skill or training. The information included herein has not been approved or verified by the SEC or by any other U.S. or foreign securities authority. Any representation to the contrary is unlawful in the U.S. Arrowstreet's principal office is located at 200 Clarendon Street, 30th Floor, Boston, Massachusetts 02116, United States. Arrowstreet Europe's registered office is 116 Park Street, Park House; London W1K 6AF UK.

These materials are being provided on a confidential basis and are not intended for public use or distribution. All information contained in these materials is proprietary and confidential. These materials may not be copied, reproduced, republished, posted, transmitted, disclosed, distributed or disseminated, in whole or in part, in any way without our prior written consent or as required by applicable law.

These materials are not intended as an offer or solicitation for the purchase or sale of any security, financial instrument, investment product or service, nor do they constitute investment advice to buy or sell any particular security, financial instrument, investment product or service. Any such offer would only be made pursuant to the relevant offering documents, the terms of which shall govern in all respects.

To the extent these materials constitute a financial promotion, such promotion is directed exclusively at persons who are professional clients or eligible counterparties for the purposes of the FCA Conduct of Business Sourcebook (COBS) and consequently the services or instruments that may be referred to in these materials are only available for use by such persons. No other person should act upon or rely on this communication.

These materials contain general information only, do not contain any personal advice and do not take into account any prospective investor's objectives, financial situation or needs. These materials do not constitute a prospectus, product disclosure statement, or other disclosure document, and will not be lodged with ASIC. Any potential invitation to acquire financial products will be an offer that does not need disclosure under section 708 of the Corporations Act or Part 7.9 of the Corporations Act. These materials are intended to be provided only to sophisticated investors, wholesale clients, and professional investors to whom disclosure is not required to be made under the Corporations Act (Recipients). By retaining these materials, the Recipient represents that the Recipient is a sophisticated investor as referred to in section 708(8)(a) of the Corporations Act, a wholesale client under section 761G of the Corporations Act, and/or a professional investor under section 9 of the Corporations Act. These materials are not to be distributed to, or disclosed to, retail clients.

These materials may include references to specific securities or financial instruments and such references are for illustrative purposes only and are not intended as investment advice or an endorsement of any particular stock, region or sector. We may have already bought or sold, or may in the future buy and sell, such securities or financial instruments on behalf of our clients. Such securities or financial instruments do not represent all of the securities or instruments that we may trade in on behalf of clients. There can be no assurance that an investment in the securities of these issuers or other financial instruments mentioned herein, or in any actual investment recommendation we make, has been or will be profitable.

These materials contain information that have been developed by us and/or obtained from publicly available documents or other sources considered by us to be reliable. We make no representation or warranty, express or implied, as to the information's accuracy or completeness. Links to third-party websites (if any) do not imply any endorsement by the third party of these materials; nor do they imply any endorsement by this firm of the third-party website or of the link. Information contained on third party websites is not reviewed for accuracy and Arrowstreet assumes no liability for the information contained on these websites.

These materials include statements or other information that may constitute "forward-looking statements" for purposes of applicable securities laws. Forward looking statements include, but are not limited to, statements that refer to targets, expectations, projections, forecasts or other characterizations of future events or circumstances, including any underlying assumptions. The words "anticipate," "believe," "continue," "could," "estimate," "expect," "intends," "may," "might," "plan," "possible," "potential," "predict," "project," "should," "would" and similar expressions may identify forward-looking statements, but the absence of these words does not mean that a statement is not forward-looking. Such statements are based in part on current market conditions, which will fluctuate and may be superseded by subsequent market events or other factors. Forward-looking statements involve known and unknown risks, uncertainties, and other factors that may cause the statements made herein to be materially different from any future results, performance or achievements expressed or implied by such forward-looking statements. Factors which could cause actual results to differ materially from those anticipated include, but are not limited to: competitive and general business, economic, market and political conditions in the United States and abroad from those expected; changes in the legal, regulatory and legislative environments in the markets in which our firm operates; and the ability of our management team to effectively implement certain strategies. Undue reliance should not be placed on these forward-looking statements. Unless otherwise provided herein, the information presented in these materials reflects our views as of the date this information is being provided to the recipient and not as of any other date. Arrowstreet undertakes no duty to update the information provided herein to reflect events or circumstances after the date they were made, whether as a result of new information, future events or otherwise.

These materials should not be construed as legal, accounting or tax advice, nor is it intended to replace the advice of a qualified attorney, accountant or tax advisor. Wherever the potential for profit exists, there is also the potential for loss. Accordingly, there can be no guarantee that any investment strategy will produce the intended results or achieve its investment objective. Past performance is not necessarily indicative of future results. There can be no assurance that any investment strategy will be able to make investments similar to those made in prior periods. The ultimate returns realized by the application of any investment strategy will depend on numerous factors that are subject to uncertainty. Accordingly, there can be no assurance that any return objectives will actually be realized.