

Data Privacy Notice

Contrarius ICAV

This notice sets out how Contrarius ICAV (the "ICAV") will process your personal information (as a Data Controller)

Where your details are provided to the ICAV as a consequence of your investment in the ICAV, then the ICAV, acting as a data controller may itself or through a third party such as KBA Consulting Management Limited (the "Manager") acting in its capacity as the Manager of the ICAV, Apex Fund Services (Ireland) Limited (the "Administrator") acting in its capacity as the ICAV's administrator, Contrarius Investment Management Limited (the "Investment Manager" and the "Global Distributor") acting in its capacity as the Investment Manager and Global Distributor of the ICAV, and their affiliates process your personal information or that of your directors, officers, employees and/or beneficial owners, and this personal information may constitute personal data within the meaning of Data Protection Legislation (as defined below).

In connection with the above, please note the following:

Purposes of Processing and Legal Basis for Processing

Your personal data will be processed by the ICAV and its appointed processors including the Manager, the Administrator, the Distributor, the Investment Manager and other delegates or duly authorised agents or related, associated or affiliated companies acting as sub-processors on behalf of the ICAV. This processing of personal data will be for any one or more of the following purposes:

- a) to facilitate the opening of your account with the ICAV and to manage and administer your holding in the ICAV and any related accounts on an on-going basis. The processing of your personal data is necessary for the performance of your contract with the ICAV, including without limitation the processing of redemption, switch, transfer and additional subscription requests, the payment of distributions, tax and other reporting to you or your representatives by email, and the provision of access to the www.contrarius.com website to view transactions and the valuation of your account;
- b) to carry out anti-money laundering checks and related actions which the ICAV considers appropriate. This processing of your personal data is necessary to meet any legal obligations imposed on the ICAV and to pursue the ICAV and the Manager's legitimate interests (and those of the Administrator) in relation to the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions. This processing is done in accordance with the ICAV's, the Manager's and/or the Administrator's anti-money laundering procedures;
- c) to report tax related information to tax authorities. This processing of your personal data is necessary in order to comply with legal obligations to which the ICAV and the Manager are subject;
- d) to disclose information to public and Government authorities that regulate or have jurisdiction over the ICAV, the Manager, the Administrator, the Global Distributor, the Investment Manager and their delegates, agents or affiliates, so as to comply with legal, tax and regulatory obligations applicable to you and/or the ICAV and/or the Manager, the Administrator, the Global Distributor, the Investment Manager and their delegates, agents or affiliates;
- e) to disclose information to third parties who provide services that assist the ICAV to manage and administer your holding in the ICAV and related accounts, including without limitation service providers of the ICAV, financial advisers, auditors, tax advisers, technology providers or to delegates of the ICAV and its or their duly appointed agents and any of their respective related, associated or affiliated companies. This processing of personal data is necessary: (i) for the performance of your contract with the ICAV; (ii) in order to comply with legal obligations to which the ICAV is subject; and (iii) to pursue the ICAV's legitimate interests (including for the operations of the ICAV, network and data security and the prevention of fraud);
- f) to monitor and record calls and electronic communications. This processing of personal data is necessary for: (i) the performance of your contract with the ICAV (e.g. this processing allows us to verify your instructions); (ii) the ICAV's legitimate interest to detect, prevent, investigate and facilitate the prosecution of crime including without limitation fraud; (iii) the ICAV's and/or the Administrator's legitimate interest to improve service delivery (e.g. for quality, business analysis, training and related purposes); (iv) compliance with a legal obligation to which the ICAV is subject, to enforce or defend the ICAV and its affiliates, either itself or through third parties to whom it delegates such responsibilities or rights in order to comply with any legal obligation imposed on the ICAV; and (v) to pursue the ICAV's legitimate interests, including minimizing the risk of error

and potential for disputes in relation to calls and electronic communications;

- g) to carry out statistical analysis and market research in order to pursue the legitimate interests of the ICAV of improving our service to you;
- h) to retain your anti money laundering and other records to assist with the subsequent screening of them by the Administrator, in pursuance of the ICAV's and the Administrator's legitimate interests; and
- i) for any other specific purposes where you give your specific consent.

Recipients of Data and International Transfer of Data

The ICAV and/or any of its delegates (including the service providers to the ICAV) and their affiliates may disclose or transfer personal data whether in Ireland, the European Economic Area ("EEA") or to countries outside the EEA, including but not limited to Jersey, South Africa, Bermuda, Australia, the United States and the United Kingdom, in accordance with the requirements of Data Protection Legislation. Such countries may not have the same data protection laws as your jurisdiction. The ICAV and/or any of its delegates will not transfer personal data to a country outside of the EEA unless that country ensures an adequate level of protection or appropriate safeguards are in place or you have explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers to you due to the absence of an adequacy decision and appropriate safeguards, or the transfer is necessary for the performance of a contract between you and the ICAV or the implementation of pre-contractual measures taken at your request. The European Commission publishes a list of countries outside of the European Union ("EU") that are deemed to provide an adequate level of data protection. If a third country does not provide an adequate level of data protection, the ICAV will authorise its delegates, including the Manager, the Administrator, the Global Distributor and the Investment Manager to put in place the relevant contractual clauses concerning data protection with relevant parties outside the EEA to whom personal data will be transferred. Where applicable, you are entitled upon request to receive a copy of the relevant safeguard (for example, EC model contractual clauses) that have been taken to protect personal data during such transfer. Please contact the Administrator if you wish to obtain a copy of the relevant safeguard.

Data Subject Rights

You have the following rights, as a data subject, pursuant to Data Protection Legislation:

1. Right to be informed by the ICAV as data controller of the personal data it holds concerning you and the right to access such personal data. The ICAV will provide you with a copy of the personal data held by it as data controller as soon as practicable and in any event not more than one month after receipt of a valid written request. Generally, the ICAV will not charge you to access such personal data, except where a request is manifestly unfounded or excessive. The ICAV may also request proof of identification to verify an access request.
2. Right to request that the ICAV amend or rectify your personal information.
3. Right to request that your personal information be erased (in certain specific circumstances).
4. Right to restrict the use of your personal information (in certain specific circumstances).
5. Right to data portability in order to transfer your personal data to another data controller in a structured, commonly used, and machine readable format where this is technically feasible, subject to certain conditions.
6. Right to object to the processing of your personal data by the ICAV in certain circumstances.

Where the ICAV, the Manager, the Administrator or other delegates require your personal information to comply with anti-money laundering or other legal requirements, failure to provide this information means that the ICAV may not be able to accept/retain you as an investor in the ICAV.

You have the right to complain to the Data Protection Commission with respect to how the ICAV processes your personal data.

Retention Period

The ICAV, as a data controller within the meaning of Data Protection Legislation, undertakes to hold any personal information provided by you in confidence and in accordance with applicable Data Protection Legislation. The Administrator and the Manager may and will hold all or part of your personal data in accordance with applicable laws even after you have fully redeemed from the ICAV. Your personal data will be kept for no longer than is necessary for the purpose(s) for which it was obtained. In determining appropriate retention periods, the ICAV shall have regard to the Statute of Limitations, 1957 (as amended), and any statutory or regulatory obligations to retain information, including anti money laundering, counter-terrorism, revenue and tax legislation.

It is important that the personal data we hold about you is accurate and current. Please keep us informed, using the Contact Us details below if any of your personal data changes during your relationship with us.

Defined Terms

For the purpose of this notice, "Data Protection Legislation" means the Data Protection Acts 1988 to 2018 (as amended, extended or replaced from time to time) and the General Data Protection Regulation (Regulation (EU) 2016/679) of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC and any implementing legislation and all amendments, extensions or re-enactments thereto. The terms "controller"; "data subject"; "personal data"; "processor"; and "processing" (and any derivations of this term) shall each have the meaning given to them under the Data Protection Legislation.

We may amend this privacy notice from time to time, to reflect any changes in the way that we process your personal data.

Contact Us

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us via the Administrator at administrator@contrarius.com.