

## HOW WE USE YOUR PERSONAL INFORMATION

**At Franklin Templeton, we care about your privacy and value the trust you place in us when you share your personal information.**

Accordingly, we wanted to let you know how we deal with the personal information you give us or is given to us by a third party. The aim of this Notice is to explain to you - as Data Subject - what kind of personal information we gather on you, why and how we process it as data controller. Data protection laws changed on 25th of May 2018, with the implementation of the EU GDPR (General Data Protection Regulation). This Notice sets out your rights with regard to this EU regulation.

From time to time, we may update this Notice, and any new version will be posted on our website. We recommend you regularly review it to ensure that you are always aware of our privacy practices.

Our privacy commitments to you:

- We will keep your data safe and private
- We will ensure that you can exercise your rights
- We will train our employees to properly manage your personal information

### 1. To whose personal information does this Notice apply?

This Notice describes our practices when using:

- i) the personal information of individuals based in the European Economic Area (EEA) or individuals outside the EEA to whom our group companies offer our services, including but not limited to individuals who have invested in the relevant Funds at Franklin Templeton (both of which are listed in Appendix 1 of this Notice) or are account holders;
- ii) the personal information of our external directors either based in the EEA or appointed to Funds marketed by Franklin Templeton in the EEA;
- iii) the personal information of the customers of, suppliers to, and firms which refer clients to, our group companies in the EEA; and
- iv) the personal information of persons based in the EEA (1) who may visit Our Websites which are intended for access from within the EEA ("Our Website") as indicated by our country menu or on the webpage itself or (2) who may visit our social media sites.

### 2. What personal information are we collecting and why?

Data Protection laws say that we are allowed to use personal information (including sharing such information with third parties) where we have a proper reason to do so.

Accordingly, we must have one or more of the following reasons:

- To fulfil a contract we have with you;
- When it is our legal duty;
- When it is in our legitimate interest\*;
- When you consent to it.

*(\*) Our legitimate interest is when we have a business or commercial reason to use the information. However, it must not unfairly go against what is right and best for you (more details are available upon request).*

In general, we may collect the following types of personal information you give us or through our third parties:

- Signature,
- Identification data, such as name, sex, age/date of birth, place of birth, contact details including address (private and professional), phone number (private and professional), email (private and professional);
- Profession, job title and position;
- Nationality or Civil status;
- Photograph;
- Passport information or other national identification number;
- Tax identification such as National Insurance Number;
- Personal bank account and financial information such as account identification and number, income and (for professional investors) financial licence;
- Information about the account holders' or investors' transactions;
- Account history with us;
- Financial details such as fees paid and bank account details;

- Financial licence, dealer number and dealer name;
- "Politically Exposed Person" status, criminal convictions and potentially source of wealth relating to an investment;
- Criminal Data required by EU AML directive(s);
- Dealer number and dealer name;
- On Our Website and social media sites, we may collect web activity, cookies information, tracking of engagement;
- Communications including emails, telephone calls, web platform calls and chats, in-person events and webinars, and letters referred to as "Communications" in this notice;
- For some of our offices, CCTV recordings may be collected for the legitimate interests of Franklin Templeton in accordance with local laws.

Depending on your Data Subject profile the reasons for processing your personal information may be different. Further information for each Data Subject profile can be found in section 8.

We also collect personal information about users through Our Website, and Franklin Templeton web pages on social media sites such as Twitter and LinkedIn, and you can refer to section 9 for more information.

### 3. What are your Rights?

Individuals have the following rights, under certain circumstances, in relation to their personal information:

- Right to access personal information
- Right to rectify personal information
- Right to restrict the use of personal information
- Right to request that personal information is erased
- Right to object to processing of personal information
- Right to data portability (in certain specific circumstances)
- Right to lodge a complaint with a supervisory authority.

If you - as an individual - wish to exercise these rights, you can download an Individual Rights Request form which is available at:

<http://www.franklintempletonglobal.com/rights-request-form.pdf>,

or contact us through the address referred to in Appendix 1 of this Notice. A summary of each right and how you can take steps to exercise it is set out below.

Where we receive a request to exercise one of these rights, we shall provide information on the action we take on the request without undue delay and in any event within one month of receipt of the request. This may be extended by a further two months in certain circumstances, for example where requests are complex or numerous.

The information will be provided free of charge, except where requests are manifestly unfounded or excessive, in particular because of their repetitive character. In these circumstances we may charge a reasonable fee or may refuse to act on the request. We will advise you of any fees prior to proceeding with a request.

We may ask for additional information to verify your identity before carrying out a request, if we consider this information insufficient we reserve the right to reject your request.

Where we do not carry out a request, we shall inform you without delay and within one month of receipt of the request, providing our reasons for not taking the action requested.

#### Right to access personal information

Individuals have the right to confirm the following with us:

- Whether or not we process personal information about them
- Certain specified information about the processing

Individuals also have a right to access the personal information and be provided with a copy.

#### Right to restrict processing of personal information

Individuals have the right to request that we restrict processing of their personal information where one of the following applies:

- An individual contests the accuracy of the personal information. The restriction will apply until we have taken steps to verify the accuracy of the personal information;

- The processing is unlawful but an individual does not want the personal information to be erased and requests restriction instead;
- We no longer require the personal information for the purposes of processing, but it is still required by an individual in connection with a legal claim;
- An individual has exercised their right to object to the processing. The restriction will apply until we have taken steps to verify whether we have compelling legitimate grounds to continue processing.

#### Right to object to processing of personal information

Where personal information is used to target marketing to an individual, they have the right to object to this at any stage.

An individual also has the right to object to processing of their personal information where the legal basis of the processing is in our legitimate interests. We will have to stop processing until we are able to verify that we have compelling legitimate grounds for processing which override the individual's interests, rights and freedoms, or alternatively that we need to continue processing for the establishment, exercise or defence of legal claims.

#### Right to rectification of personal information

If an individual believes that the personal information we hold on them is inaccurate, they may request that it be amended. They may also request that incomplete personal information be completed, including by providing a written confirmation.

#### Right to request erasure of personal information ("right to be forgotten")

An individual may also request the erasure of their personal information in certain circumstances, including the following (this is not an exhaustive list):

- The personal information is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- The processing was based on consent which has been withdrawn and there is no other legal basis for processing;
- The individual has exercised their right to object to the processing and there are no overriding legitimate grounds for the processing to continue.

There are also certain exceptions where we may refuse a request for erasure, for example, where the personal information is required to comply with a legal obligation or for the establishment, exercise or defence of legal claims.

If an individual does request erasure of their personal information, this will potentially remove records which we hold for their benefit, such as their presence on a suppression list and they will have to contact us to provide personal information if they wish for us to hold this in future.

#### Right to Data Portability

Where we are relying upon the legal basis either of consent or that the processing is necessary for the performance of a contract to which an individual is a party, and that personal information is processed by automatic means (e.g. electronically), an individual has the right to receive all the personal information which they have provided to us in a structured, commonly used and machine-readable format and to transmit this to another controller directly, where this is technically feasible.

#### Supervisory Authority

An individual also has a right to lodge a complaint with a supervisory authority, in particular in the Member State in the European Union where they are habitually resident, where they work or where an alleged infringement of Data Protection laws has taken place.

## 4. Marketing Communications

If you are an account holder and/or investor, business contact, subscriber or potential client covered by this Notice, we will keep you up-to-date with details of our products and services through Communications using the information that you have supplied. When required by regulation and/or law, we will obtain the proper consent to use your contact details, including your email addresses. In any case, you can change your preferences in regards to marketing communications by contacting us.

Additionally, we will ensure that any third party assisting us in marketing our products and services, or with whom we have joint marketing agreements, are under contractual obligations to protect the confidentiality of your personal information, and will use it only to provide services pertaining to the contract.

## 5. International transfers & data sharing

There may be occasions when the relevant Franklin Templeton group company who is the data controller as set out in Appendix 1 of this Notice will be a joint controller with another Franklin Templeton group company. Where the other Franklin Templeton group company is based outside the EEA, then the data controller responsible for responding to requests to exercise your rights will be the relevant company set out in Appendix 1 of this Notice. In all cases, any complaints and requests to exercise your rights should be addressed to the Data Protection Officer (refer to Appendix 1 of this Notice), who will arrange for the responsible joint controller to handle the complaint or request. We may also transfer and maintain your personal information covered by this Notice on servers or databases outside the European Economic Area (EEA).

The countries to which we transfer data outside of the EEA include:

Australia, Bahamas, Bermuda, Brazil, British Virgin Islands, Canada, Chile, China, Colombia, Cayman Islands, Hong Kong, India, Japan, Republic of Korea, Malaysia, Mauritius, Mexico, Singapore, South Africa, Switzerland, Turkey, United Arab Emirates, United Kingdom, United States, and Uruguay.

Some of these countries may not have the equivalent level of data protection laws as those in your location. If we need to transfer personal data outside the EEA, we will take steps to make sure your personal information is protected and safeguarded once it leaves the EEA, in particular, we will use the EU Data Protection Model Clauses approved by the European Commission and permitted under Article 46 of the GDPR. If you would like to obtain the details of such safeguards, you can request these from the Data Protection Officer.

In addition to sharing the information with other group companies and third parties, we may disclose or transfer your personal information to a prospective or actual purchaser or transferee, in the event that a Franklin Templeton company or its assets is / are merged or sold or a sale or transfer is intended.

## 6. Retention Periods

We will retain your personal information covered by this Notice for as long as required to perform the purposes for which the data was collected, depending on the legal basis on which that data was obtained and/or whether additional legal/regulatory obligations mandate that we retain the personal information. In general terms, this will mean that personal information will be kept for the duration of our relationship and:

- the period required by tax, company and financial services laws and regulations; and
- as long as it is necessary for individuals to be able to bring a claim against us and for us to be able to defend ourselves against any legal claims. This will generally be the length of the relationship plus the length of any applicable statutory limitation period under applicable law.

It may differ from jurisdiction to jurisdiction however, in the majority of cases, this will be during our relationship and then for 10 years after the end of the relationship.

We retain your personal information if you have invested in Funds based in the United Kingdom for 6 years after the end of the relationship. We retain your personal information if you have invested in Funds based in the Republic of Ireland for 7 years after the end of the relationship.

In certain circumstances, data may need to be retained for a longer period of time, for example, where we are in ongoing correspondence or there is a continuing claim or investigation.

Our web logs are kept for 60 days to support investigation and reporting of any attempted security breaches on Our Websites.

## 7. Confidentiality and Security

We have implemented reasonable technical and organisational measures designed to secure personal information from accidental loss and unauthorised access, use, alteration or disclosure. Our employees are required to follow specific procedures with respect to maintaining the confidentiality of our investors' personal information. Additionally, we maintain physical, electronic, and procedural safeguards to protect the personal information that we process. This includes performing ongoing evaluations of our systems containing investor information and making changes when appropriate.

However, as regards information transmitted via the Internet, the Internet is an open system and we cannot and do not guarantee or warrant the security of any information that an individual transmits on or through Our

Website or that we otherwise maintain, although Our Website uses the secure file transfer protocol where appropriate.

## 8. Data Subjects type details

### Account holder and investor personal information

Personal Information we collect about account holders and investors in Franklin Templeton Funds.

Account holders and investors include unitholders and shareholders of the Funds that we operate, administer, and to which we provide transfer agency, registration, other services, or which we distribute.

We collect certain personal information on various accounts but is not limited to the following holders and investors in our Funds, direct from the account holders and investors, through their referring professional adviser, intermediary or bank or other firm or, in the case of Know Your Client Information, from third party lists on Politically Exposed Persons, sanctions or other matters related to our compliance with regulation or risk analysis.

We may collect the information through applications or other forms, whether we receive the forms in writing or electronically. This personal information includes but is not limited to the following:

- identification data and data we use to communicate with account holders and investors, such as their name, position, current and former addresses (private and professional), telephone number (private and professional), email address, age/date of birth, place of birth, nationality, sex, civil status and a photograph;
- identification numbers we receive from account holders and investors or third parties, such as tax, passport, national or other identification number;
- personal bank account and financial information such as account identification and number, income and (for professional investors) financial licence;
- information about the account holders' or investors' transactions (requested through Our Website or otherwise) and account history with us, or with other companies that are part of Franklin Templeton, including investment selection, account balances, shareholdings or unit holdings, redemption fees, and transaction instructions;
- account holders' and investors' Communications or queries to us concerning their investments;
- recordings of Communications;
- information we collect for Know Your Client purposes. This may include information which we will process in order to determine an account holder's or investor's status as a Politically Exposed Person if we have their consent or are otherwise authorised to use this information under applicable law. This may also include information about criminal convictions if we are authorised to use this information under applicable law. In certain circumstances, we will also request information regarding the source of wealth relating to an investment with us;
- where we provide on-line account access (when requested by the account holder or investor or their financial adviser), log-in and similar credentials, and information about use of such access;
- for our events, webinars and engagement with our Websites and social media platforms, we may collect and use your registration details, track event/Website/social media platform engagement for confirmation of continuing education credits or for internal analysis and research to help improve our products and services;
- when invited to participate in any hosted sessions for our Website user development, sessions can include tracking eye movements, mouse clicks and video recording of users' experiences; and
- other general information that we may obtain about account holders and investors such as demographic information.

**How we use account holders' and investors' personal information** We use the personal information we collect about account holders and investors for the following purposes:

- verifying identity, checking transactions for anti-money laundering purposes as required by the [Anti-Money Laundering rules and regulations, as updated](#), assisting in the prevention of fraud, terrorist financing, bribery and corruption, and assisting us to not provide services to persons who may be subject to economic or trade sanctions;
- managing their holdings in the relevant fund or any related account on an on-going basis (including responding to their requests and performing transactions for them), and also enabling their investment adviser, dealer and our Transfer Agency personnel to provide account

management services (including the ability to view the investor's account);

- internal analysis and research to help us improve our services to account holders and investors and to better service their accounts;
- live testing of our systems on an exceptional basis, to resolve issues internally as soon as possible to enable us to deliver high standards of service;
- protecting our account holders' and investors' holdings and data; and
- providing account holders and investors with more choices or information about products and services which may be of interest to them, with the account holder's or investor's consent (see "Marketing Communications" above).

We justify our processing of account holders' and investors' personal information on the following legal bases:

- performing a legal obligation to which we are subject, which may include certain legal or regulatory disclosures and recording services we provide through Communications;
- performing our obligations under our contracts with account holders and investors;
- performing a task in the public interest, for example where we are carrying out our verification processes in relation to the prevention of fraud, money laundering, terrorist financing, bribery and corruption and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions;
- pursuing our legitimate interests and those of third parties. A legitimate interest will apply only where we consider that it is not overridden by an account holder's or investor's interests or rights which require protection of their personal information.

We have determined that our legitimate interests include the following:

- The improvement and management of our account holder and investor services;
- Our compliance with our regulatory requirements and improving the overall performance of the Funds;
- The conduct of internal audits for the legitimate purposes of managing our business;
- Live testing as described above in scenarios where live data is required, for the legitimate purposes of ensuring the resilience of our systems and continuing high standards of service;
- Tracking the effectiveness of mailing and targeting personalised marketing to account holders and investors for the legitimate purposes of promoting our business and our brand or otherwise where consent has been obtained;
- Obtaining professional (including legal) advice and tracking and reporting on ongoing litigation involving account holders and investors to protect our business and our brand.

If an account holder or investor requires further information regarding our legitimate interests as applied to their personal information, they may contact the Data Protection Officer.

We also process personal information where an account holder or investor has provided consent, such as in the case of certain marketing communications (see "Marketing Communications" above), and the use of information in determining an individual's status as a Politically Exposed Person for Know Your Client purposes. In the event that an account holder or investor wishes to withdraw their consent they should contact the Data Protection Officer.

In certain circumstances, where an account holder or investor does not provide personal information which is required (for example, for us to carry out anti-money laundering checks), we will not be able to provide the products and services under our contract with them or may not be able to comply with a legal obligation on us. We will make it clear if and when this situation arises and what the consequences of not providing the information will be for the account holder or investor.

**Recipients of personal information about account holders and investors** We will disclose account holders' and investors' personal information as follows:

- to our affiliated Franklin Templeton group companies and entities, as detailed in Appendix 1, in order to process the data for the above mentioned purposes;
- and to relevant categories of third parties detailed in Appendix 2.



## External director information

We collect the following information from our external directors (which includes authorised signatories and other officers of our Funds):

- Identification data, such as name, address, phone number, email;
- Tax identification such as National Insurance Number;
- Passport information;
- Financial details such as fees paid and bank account details;
- Communications.

**How we use information we collect about our external directors** We use the personal information we collect about external directors for the purposes of:

- Managing and fulfilling our obligations under our contracts with external directors;
- Compliance with any contractual, legal or regulatory obligations, including our on-boarding processes;
- Management of our business and other legitimate business purposes and otherwise to enable the fulfilment of the duties of our external directors.

We justify our processing of external directors' personal information on the following legal bases:

- performing our obligations, or entering into, a contract with our external directors;
- performing a legal obligation to which we are subject, which may include certain legal or regulatory disclosures;
- performing a task in the public interest, for example where we are carrying out our verification processes in relation to the prevention of fraud, money laundering, terrorist financing, bribery and corruption and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions;
- pursuing our legitimate interests and those of third parties. A legitimate interest will apply only where we consider that it is not overridden by an external director's interests or rights which require protection of their personal information.

We have determined that our legitimate interests include the following:

- The improvement and management of our services;
- Our compliance with our regulatory requirements;
- Improving the overall performance of the Funds.

If an external director requires further information regarding our legitimate interests as applied to their personal information, they may contact the Data Protection Officer.

In certain circumstances, where an external director does not provide personal information which is required (for example, for us to carry out anti-money laundering checks), we will not be able to perform our obligations under the contract with them or may not be able to comply with a legal obligation. We will make it clear if and when this situation arises and what the consequences of not providing the information will be for the external director.

### Recipients of personal information about external directors

We will disclose personal information of external directors as follows:

- to our affiliated Franklin Templeton group companies and entities, as detailed in Appendix 1, in order to process the data for the above mentioned purposes;
- and to relevant categories of third parties detailed in Appendix 2.

## Business contact and potential client information

We collect personal information from our business contacts and potential clients, such as representatives of banks or financial firms, professional advisers, suppliers and potential investors including the following:

- name, job title, profession, and contact details including email;
- where we provide online access to accounts, log-in and similar credentials, and information about our business contacts and potential clients' use of those services;
- Communications with our business contacts and potential clients;
- for our events, webinars and engagement with our Websites and social media platforms, we may collect and use your registration details, track event/Website/social media platform engagement for confirmation of continuing education credits or for internal analysis and research to help improve our products and services;
- when invited to participate in any hosted sessions for our Website user development, sessions can include tracking eye movements, mouse clicks and video recording of users' experiences; and

- financial licence, dealer number and dealer name.

### How we use business contact and potential client information

We use personal information from our business contacts for the following purposes:

- to communicate about the services we offer and provide to mutual clients or investors whom our business contacts refer to us;
- to enable business contacts to use our online services;
- to send marketing communications (see section above on Marketing Communications) about our services and products we think may be of interest to our potential clients, our business contacts or our mutual clients or investors whom they refer to us;
- to invite our business contacts to events;
- for internal analysis and research to help us improve our services;
- to communicate about the goods and services we obtain from our suppliers.

We justify our processing on the following legal bases:

- performing our obligations under our contracts with other businesses;
- pursuing our legitimate interests and those of third parties. A legitimate interest will apply only where we consider that it is not overridden by a business contact's interests or rights which require protection of their personal information.

We have determined that our legitimate interests include the following:

- The improvement and management of our services;
- The promotion of our business and brand;
- The improvement of the overall performance of the Funds;
- Conducting internal audits for the legitimate purposes of managing our business;
- Tracking the effectiveness of mailing and targeting personalised marketing to business contacts for the legitimate purposes of promoting our business and our brand or where otherwise consent has been obtained;
- Populating client relationship management systems to facilitate ongoing relationships and creating new opportunities for the business.

If a business contact or a potential client requires further information regarding our legitimate interests as applied to their personal information, they may contact the Data Protection Officer. In certain circumstances, where a business contact does not provide personal information which is required (for example, in relation to our online services), we will not be able to perform our obligations under the contract with them or may not be able to provide them with products and services. We will make it clear if and when this situation arises and what the consequences of not providing the information will be for the business contact.

### Recipients of business contacts and potential clients data

We may disclose business contacts' or potential clients' personal information as follows:

- to our affiliated Franklin Templeton group companies and entities, as detailed in Appendix 1, in order to process the data for the above mentioned purposes;
- and to relevant categories of third parties detailed in Appendix 2.

## 9. Web-related collection of personal information

### Information we collect about users of Our Website and social media sites

We collect personal information about users through Our Website, and Franklin Templeton web pages on social media sites such as Twitter and LinkedIn, including the following:

- Information users provide when they enter information on Our Website, such as when submitting a "Contact Us" message (such as name, email address, salutation);
- Information users provide when they subscribe to email newsletters, press releases or other periodicals through Our Website (such as name, email address, salutation, investor type and country of residence);
- Information users provide when posting content on social media sites;
- Information users provide in their social media bio;
- Information users provide when they respond to a survey or marketing communication, such as their opinions about our services and information about themselves (such as age range, services used, how they know us, their opinions of our services);
- Information users provide when they register for an online account through Our Website (such as name, email address, address, date of birth, unique identification numbers (e.g. client reference number, social

security number). The decision to provide this information is optional. However, if the user decides not to provide such information, they may not be able to access certain content or features available on or through Our Website;

- Information captured in our web logs such as device information (e.g. device brand and model, screen dimensions), unique identification numbers (e.g. IP address and device ID), and browser information (e.g. URL, browser type, pages visited, date/time of access);
- Information captured by our cookies (see 'Cookies, Tags and Similar Technologies' section below);
- Advertising information (such as size/type of ad, ad impressions, location/format of ad, data about interactions with the ad);
- Behavioural information (such as information on the behaviour or presumed interests of individuals which are linked to those individuals and may be used to create a user profile); and
- Information users provide in connection with purchasing items from Our Website shops (such as name, payment card information, and billing and delivery address and purchase details).

**Our Websites and online services are for individuals who are at least 18 years of age. Our online services are not designed to be used by minors under the age of 18.**

In certain circumstances, where a website user does not provide personal information which is required (for example, in relation to our online services), we will not be able to perform our obligations under the contract with them or may not be able to provide them with products and services. We will make it clear if and when this situation arises and what the consequences of not providing the information will be for the website user.

[How we use website and social media users' information](#)

We use the personal information we collect from Our Website users and individuals accessing Franklin Templeton web pages on social media sites for the purposes of:

- personalizing their experience of Our Website;
- monitoring social media content to manage relations with our customers and promote our business and brand;
- if there is an interaction on a social media site with a third party social media user that we consider that we should react on, passing a link to the content and third party's profile to the department of interest;
- providing products and services that website users have requested;
- administering the website, investigating any complaints and providing customer service;
- providing website users and individuals accessing our web pages on social media sites with information and offers on products or services that may be of interest to them (see section above on Marketing Communications); and
- performing statistical and trend analysis to improve the user experience and performance of Our Website.

Please see below as regards information we collect through cookies and other tracking technologies.

We justify our processing on the following legal bases:

- consent to receiving our marketing communications (see above section on Marketing Communications), where applicable. In the event that an individual wishes to withdraw their consent they will have an option to "Unsubscribe" or may contact the Data Protection Officer;
- performing our obligations under our contracts with users buying goods and services from our Webshop or registering online to receive our services or using our online services (subject to our separate terms and conditions of supply);
- compliance with the law or regulatory requirements; and
- pursuing our legitimate interests. A legitimate interest will apply only where we consider that it is not overridden by a website or social media user's interests or rights which require protection of their personal information.

We have determined that our legitimate interests include the following:

- Promoting our products, services and Funds through Our Website and other Communications;
- Monitoring, investigating and reporting any attempts to breach the security of Our Websites;
- Improving the performance and user experience of Our Website;
- Performing our obligations under our contracts with our users;
- Managing our business and brand by monitoring our public profile and responding promptly to complaints;

- Improving the security, performance and user experience of Our Website;
- Targeting personalised marketing to website and social media users for the legitimate purposes of promoting our business and our brand.

If a website user or individual accessing our web pages on social media sites requires further information regarding our legitimate interests as applied to their personal information, they may contact the Data Protection Officer.

Survey Information: Occasionally we may ask users to participate in a brief survey to help us make smart choices as we look for ways to improve Our Website. Information users provide in response to such surveys will not be identified with them unless they consent.

#### **Recipients of website and social media user data**

We may disclose personal information of website and social media users as follows:

- to our affiliated Franklin Templeton group companies and entities, as detailed in Appendix 1, in order to process the data for the above mentioned purposes;
- and to relevant categories of third parties detailed in Appendix 2.

#### **External Links**

Our Website may contain links to online websites or content operated and maintained by third parties, over which we have no control. Please consult the privacy policies of these third-party sites to become familiar with their privacy practices and to learn about any choices that these companies may offer you with respect to your personal information.

### **10. Cookies, tags and similar technologies**

A cookie is a small text file which includes a unique identifier that is sent by a web server to the browser on your computer, mobile phone or any other internet enabled device when you visit an on-line site. Cookies and similar technologies are widely used to make websites work efficiently and to collect information about your online preferences.

For simplicity, we refer to all these technologies as "cookies".

Some of Our Website pages may contain electronic images known as web beacons (also known as clear gifs, tags or pixels) that allow us to count users who have visited our pages. Web beacons collect only limited information, e.g. a cookie number, time and date of a page view, and a description of the page on which the web beacon resides. We may also carry web beacons placed by third party advertisers. These beacons do not carry any information that could directly identify you.

#### **How do we use cookies?**

We use cookies and other tracking technologies to customise content and advertising, provide social media features and to see how our visitors move through Our Website. We use this information to make decisions about ways to improve the services we offer you. We may engage third party tracking and advertising providers such as those named below to act on our behalf to track and analyse your usage of Our Website through the use of cookies. These third parties collect, and share with us, usage information about visits to Our Website and, sometimes by correlating this information with other information (e.g. your IP address), measure and research the effectiveness of our advertisements, track page usage, help us target our recommendations and advertising, and track use of our recommendations and advertisements.

#### **Cookies and types of cookies we use**

You can find more information about cookies and the types of cookies we use on our websites in the cookie register which can be found at: [www.franklintempletonglobal.com/privacy/cookie-register](http://www.franklintempletonglobal.com/privacy/cookie-register).

Contact our Data Protection Officer at the address referred to in Appendix 1 of this Notice if you would like a hard copy of this register, or you have any specific queries regarding the cookies which are deployed on Our Website.

You can find more information about cookies, behavioural advertising and online privacy at:

[www.allaboutcookies.org](http://www.allaboutcookies.org) or [www.youronlinechoices.com](http://www.youronlinechoices.com).

#### **Enabling and Disabling Cookies**

You can choose whether to switch on or off cookies by visiting the Cookie Preference centre. You can select which cookie categories you wish to allow.

[PREFERENCES](#)

## APPENDIX 1

### FRANKLIN TEMPLETON GROUP COMPANIES & FUNDS

Franklin Templeton and all its group companies have access to information on individuals covered by this Notice. However, only appropriate data controllers have access to relevant investor data. Franklin Templeton Funds and their Management Companies act as joint-controller.

Below our most impacted fund group companies and funds are noted.

For a full list, please visit:

[www.franklintempletonglobal.com/privacy/fund-entities](http://www.franklintempletonglobal.com/privacy/fund-entities)

#### How to Contact Us

If an individual wishes to exercise their individual rights, or to raise any questions, concerns or complaints concerning this Notice or on our privacy practices, they can contact us at the relevant address for their country listed below. The individual should address the envelope as follows: "FAO Data Protection Officer".

Alternatively, our Data Protection Officer can be contacted directly at:

**Franklin Templeton International Services S.à r.l.**

8A, rue Albert Borschette

L-1246 Luxembourg

Grand Duchy of Luxembourg

Email Address: [DataProtectionOfficer@franklintempleton.com](mailto:DataProtectionOfficer@franklintempleton.com)

#### Franklin Templeton Group Companies

##### AUSTRIA:

Franklin Templeton Austria GmbH  
Universitätsring 10, 4th Floor  
1010 Vienna, Austria

##### BELGIUM:

Franklin Templeton International Services S.à r.l., Belgian Branch  
Rue Belliard, 40  
1040 Brussels, Belgium

##### FRANCE:

Franklin Templeton International Services S.à r.l., French Branch  
14 Boulevard de la  
Madeleine  
75008 Paris, France

##### GERMANY:

Franklin Templeton International Services S.à r.l. Niederlassung Deutschland  
Mainzer Landstr. 16  
D-60325 Frankfurt am Main, Germany  
Franklin Templeton Digital Advisory Services GmbH  
Große Gallusstraße 16 – 18  
60312 Frankfurt am Main, Germany

##### HUNGARY:

Franklin Templeton Magyarország Kft.  
Sas utca 10-12  
1051 Budapest, Hungary

##### IRELAND:

Franklin Floating Rate Fund Plc (FFRF)  
Franklin Emerging Market Debt Opportunities Fund (FTEMDOF)  
JPMorgan House  
International Financial Services Centre  
Dublin 1, Ireland  
Franklin Liberty Shares ICAV (Irish ETF)  
78 Sir John Rogerson's Quay  
Dublin 2, Ireland

##### ITALY:

Franklin Templeton International Services S.à r.l., Italian Branch  
C.so Italia, n.1  
20122 Milano, Italy

##### LUXEMBOURG:

Franklin Templeton Management Luxembourg S.A.  
Franklin Templeton International Services S.à r.l.  
Franklin Templeton Investment Funds (FTIF)  
Franklin Templeton Series II Funds (FTSIIF)  
Franklin Templeton Sharia Funds (FTSF)  
Franklin Templeton Specialized Investment Funds (FTSIF)  
Franklin Templeton Opportunities Fund (FTOF)  
Franklin Templeton Private Real Estate Fund IIIB SCSP  
8A, rue Albert Borschette  
L-1246 Luxembourg, Grand Duchy of Luxembourg

##### NETHERLANDS:

Franklin Templeton International Services S.à r.l., Netherlands Branch  
World Trade Center Amsterdam  
H-toren, 5e verdieping Zuidplein 36  
1077 XV Amsterdam, Netherlands

##### POLAND:

Templeton Asset Management (Poland)  
Towarzystwo Funduszy Inwestycyjnych S.A.  
Franklin Templeton Investments Poland Sp. z o.o.  
Franklin Templeton International Services S.a.r.l. (Sp. z o.o.) Oddział w Polsce  
Franklin Templeton Fundusz Inwestycyjny Otwarty  
Rondo ONZ 1, 29th Floor  
00-124 Warsaw, Poland

##### ROMANIA:

Franklin Templeton International Services S.à r.l., Sucursala Bucuresti  
Fondul Proprietatea S.A.  
Premium Point  
78-80 Buzesti, 8th floor  
District 1, Bucharest, Romania

##### SLOVAKIA:

Franklin Templeton Slovakia, s.r.o.  
Regus Business Centre, Karadzicova 8/A  
821 08 Bratislava, Slovakia

##### SPAIN:

Franklin Templeton International Services S.à r.l., Spanish Branch  
Calle Jose Ortega y Gasset, 29–5a planta  
28006 Madrid, Spain

##### SWEDEN:

Franklin Templeton International Services S.à r.l., Swedish Branch  
Blasieholmsgatan 5  
SE-111 48 Stockholm, Sweden

##### UNITED KINGDOM:

Franklin Templeton Investment Management Limited  
Franklin Templeton Investment Trust Management Limited  
Franklin Templeton Global Investors Limited  
Franklin Templeton Fund Management Limited  
Franklin Templeton Funds (OEIC)  
Franklin Templeton Targeted Strategies Fund ICVC  
Templeton Emerging Markets Investment Trust (Temit)  
Cannon Place, 78 Cannon Street  
London EC4N 6HL, United Kingdom

##### UNITED STATES OF AMERICA:

Templeton Growth Fund (TGF) Inc – Fund  
P.O. Box 33030  
St. Petersburg Florida 33733-8030, USA  
Franklin Templeton Private Real Estate Fund, L.P (Series B/C)  
Franklin Templeton Private Real Estate Fund IIB, L.P.  
Corporation Trust Center, 1  
209 Orange Street, County of New Castle  
Wilmington, Delaware 19801

## APPENDIX 2

### THIRD PARTY AND OTHER RECIPIENTS CATEGORIES

Account Holders & Investors	Business Contacts & Potential Clients	External Directors	Website and social media users
<ul style="list-style-type: none"> <li>Administrators</li> <li>Banking Application Suppliers</li> <li>Cloud-based solution providers</li> <li>Couriers</li> <li>Courts</li> <li>Custodians</li> <li>Document Archive, Storage and Destruction Suppliers</li> <li>Events Management Providers</li> <li>Financial Services providers</li> <li>Investment Managers</li> <li>IT Systems Suppliers</li> <li>Parties representing an account holder or investor</li> <li>Print Services Suppliers</li> <li>Professional advisors, i.e. auditors and lawyers</li> <li>Regulators</li> <li>Security or Police Authorities</li> <li>Tax Authorities</li> <li>Trade Messaging System Suppliers</li> <li>Transfer Agencies</li> </ul>	<ul style="list-style-type: none"> <li>Administrators</li> <li>Asset Management services</li> <li>Banking Platforms</li> <li>Brokers</li> <li>Business Contact database administrators</li> <li>Cloud-based solution providers</li> <li>Couriers</li> <li>Courts</li> <li>Custodians</li> <li>Dealing platforms</li> <li>Document Archive, Storage and Destruction Suppliers</li> <li>Events Management Providers</li> <li>IT Systems Suppliers</li> <li>Print Services Suppliers</li> <li>Professional advisors, i.e. auditors and lawyers</li> <li>Regulators</li> <li>Security or Police Authorities</li> <li>Tax Authorities</li> <li>Trade Messaging System Suppliers</li> <li>Transfer Agencies</li> </ul>	<ul style="list-style-type: none"> <li>Administrators</li> <li>Asset Management services</li> <li>Banking Platforms</li> <li>Brokers</li> <li>Cloud-based solution providers</li> <li>Couriers</li> <li>Courts</li> <li>Custodians</li> <li>Dealing platforms</li> <li>Document Archive, Storage and Destruction Suppliers</li> <li>Events Management Providers</li> <li>IT Systems Suppliers</li> <li>Payroll Providers</li> <li>Print Services Suppliers</li> <li>Professional advisors, i.e. auditors and lawyers</li> <li>Regulators</li> <li>Security or Police Authorities</li> <li>Tax Authorities</li> <li>Trade Messaging System Suppliers</li> <li>Transfer Agencies</li> </ul>	<ul style="list-style-type: none"> <li>Account Processing System suppliers</li> <li>Business Contact database administrators</li> <li>Social Media Providers</li> </ul>

#### What these Third Parties do

**Account Processing System suppliers** - Third parties working on FT's behalf to service or maintain business contact databases, and systems processing account information, such as suppliers' systems supporting Our Website.

**Administrators** - Third parties working on FT's behalf or for the account holder, investor or institutional client to service or maintain accounts.

**Asset Management services** - Third parties working on FT's behalf or for the account holder, investor and institutional clients providing administration, transfer or asset management services.

**Banking Application Suppliers** - Third parties providing technical services to process transactions requested by investors, or relating to the administration of their investment, specifically for banking systems.

**Banking Platforms** - Third parties working on FT's behalf or for the account holder, investor and institutional clients providing administration, transfer or asset management services.

**Brokers** - Third parties working on FT's behalf or for the account holder, investor or institutional client to service or maintain accounts.

**Business Contact database administrators** - Third parties working on FT's behalf to service or maintain business contact databases, and systems processing account information, such as suppliers' systems supporting FT's Website(s).

**Cloud-based solution providers** - Third parties who provide technical services to process transactions requested by investors, or relate to their investment administration, specifically for IT systems. This also includes cloud-based solutions such as Translations services, and Training solutions.

**Couriers** - Third parties working on FT's behalf to provide courier services.

**Courts** - Competent third-party authorities where required or requested by law, or where we consider it necessary.

**Custodians** - Third parties working on FT's behalf or for the account holder, investor or institutional client to service or maintain accounts.

**Dealing platforms** - Third parties working on FT's behalf or for the account holder, investor or institutional client to service or maintain accounts.

**Document Archive, Storage and Destruction Suppliers** - Third parties working on FT's behalf to provide document archive and storage services.

**Events Management Providers** - Third parties working on FT's behalf to plan, organise and facilitate events.

**Financial Services providers** - Third parties who have introduced account holders and investors to FT. These service providers offer banking, trust and custodial products and services in order to process the data, including access through our portal.

**Investment Managers** - Third parties working on FT's behalf or for the account holder or investor to service or maintain accounts.

**IT Systems Suppliers** - Third parties who provide technical services to process transactions requested by investors, or relate to their investment administration, specifically for IT systems.

**Parties representing an account holder or investor** - Third parties representing an account holder or investor, e.g. in response to a legal process.

**Payroll Providers** - Third parties who provide services on FT's behalf, for the benefit of external directors.

**Print Services Suppliers** - Third parties who provide technical services to process transactions requested by investors, or relate to their investment administration, specifically for print services.

**Professional advisors, i.e. auditors and lawyers** - Third parties who provide services to Franklin Templeton group companies, such as its professional advisers (e.g. auditors and lawyers).

**Regulators** - Competent third-party authorities where required or requested by law, or where we consider it necessary.

**Security or Police Authorities** - Competent third-party authorities where required or requested by law, or where we consider it necessary.

**Social Media Providers** - Social Media providers supporting Franklin Templeton web pages, such as Twitter and LinkedIn.

**Tax Authorities** - Competent third-party authorities where required or requested by law, or where we consider it necessary.

**Trade Messaging System Suppliers** - Third parties who operate systems relevant to performing transactions for account holders, investors or institutional clients.

**Transfer Agencies** - Third parties working on FT's behalf or for the account holder, investor or institutional client to service or maintain accounts.