

FUNDLOGIC ALTERNATIVES PLC

PRIVACY STATEMENT – SERVICE PROVIDERS, SUPPLIERS AND RELATED PARTIES

FundLogic Alternatives plc (the “**Company**”) will collect and process the Personal Data of natural persons who are directors, officers, employees, agents and / or authorised signatories of the Company’s service providers, distributors, sub-distributors, investment advisors, investment managers, vendors, professional services firms and other commercial partners (“**Individuals**”) for the purposes of and in connection with the Company’s dealings with those commercial entities. This Privacy Statement explains how the Company will manage the Personal Data of those Individuals, why the Company uses it, and how Individuals may contact the Company in relation to the use of Personal Data.

Personal Data means any information which the Company has or obtains, or which an Individual provides to the Company, and specifically his / her name, address, email address, phone number(s), title or position, from which that Individual can be directly or indirectly personally identified.

Use of Personal Data and Basis of Processing

The Company will use the Personal Data:

1. where use is for a legitimate purpose of the Company, including:
 - (a) for the purposes of managing its contracts and relationships with its service providers, distributors, sub-distributors, investment advisors, investment managers, vendors, professional services firms and other commercial partners;
 - (b) for day to day operational and business purposes;
 - (c) board reporting and management purposes, including quality assurance
 - (d) in the event of a merger or proposed merger of the Company or any sub-fund of the Company, or any other restructuring or reorganisation of the Company or any sub-fund of the Company or relating to the assets of the Company or any sub-fund of the Company;
2. where use or sharing is for a legitimate purpose of another company in the Morgan Stanley group of companies, or of a third party to which the Company provides the Personal Data, including:
 - (a) for day to day operational and business purposes;
 - (b) investor relationship management;
3. for compliance with the Company’s legal obligations, including:
 - (a) compliance with applicable tax and regulatory reporting obligations;
 - (b) where the Company is ordered to disclose information by a court with appropriate jurisdiction;
 - (c) recording of telephone calls and electronic communications in order to comply with applicable law and regulatory obligations;

4. where necessary to establish, exercise or defend its legal rights or for the purpose of legal proceedings;
5. where an Individual has consented to use for a particular purpose. If an Individual gives consent for the Company to use his / her Personal Data for a particular purpose, that Individual has the right at any time to withdraw consent to the future use of his / her Personal Data for some or all of those purposes by writing to the address specified below.

The Company will not disclose any Personal Data to any third party, except as outlined above and / or as follows:

- (a) to enable the Company to carry out the obligations under and enforce its contracts with its suppliers, service providers, vendors and other commercial partners;
- (b) to anyone providing a service to the Company or acting as the Company's agent, as data processors, for the purposes of providing services to the Company and on the understanding that they will keep the Personal Data confidential;
- (c) where the Company needs to share Personal Data with its auditors, and legal and other advisors;
- (d) in the event of a merger or proposed merger of the Company or any sub-fund of the Company;
- (e) the disclosure is required by law or regulation, or court or administrative order having force of law, or is required to be made to any of the Company's regulators.

International transfers

Personal Data may be transferred outside Ireland in connection with the uses described above, where an Individual has explicitly consented, and / or as otherwise required or permitted by law.

Many of the countries will be within the European Economic Area (the "EEA"), or will be ones which the European Commission has approved, and will have data protection laws which are the same as or broadly equivalent to those in Ireland. However, some transfers may be to countries which do not have equivalent protections, and in that case the Company shall use reasonable efforts to implement contractual protections for the Personal Data. While this will not always be possible, where the Company is required to transfer the Information where it has a legal obligation to do so, any transfers will be done in accordance with applicable data protection laws, including through the implementation of appropriate or suitable safeguards in accordance with such applicable data protection laws.

Further information in relation to international transfers and any safeguards which are in place may be obtained by contacting the Distributor (details of which are set out in the prospectus in respect of the Company which is available at www.fundlogic.com).

Third Party Providers of Information

The Company may obtain Personal Data relating to Individuals from someone other than that Individual, such as his / her employer. The person providing the information will be asked to warrant that it will only do so in accordance with applicable data protection laws, and that it will ensure that before doing so, the Individuals in question are made aware of the fact that the Company will hold information relating to them and that it may use it for any of the purposes set out in this privacy statement, and where necessary that it will obtain consent to the Company's use of the information.

The Company may, where required under applicable law, notify those individuals that they have been provided with their Personal Data and provide a copy of this Privacy Statement to them.

Recipients of the Personal Data

In any case where the Company shares Personal Data with a third party data controller (including, as appropriate, the Company's advisors), the use by that third party of the Personal Data will be subject to the third party's own privacy policies.

Updates to Personal Data

The Company will use reasonable efforts to keep Personal Data up to date. However, each Individual will need to notify the Company without delay in the event of any change in his / her personal circumstances, or those of the others mentioned above, so that the Company can keep the Personal Data up to date.

Retention of Personal Data

The Company is obliged to retain certain information to ensure accuracy, to help maintain quality of service and for legal and regulatory purposes, and for legitimate business purposes.

Information will be retained for no longer than is necessary for the purpose for which it was obtained by the Company or as required or permitted for legal and regulatory purposes, and for legitimate business purposes. In general, the Company (or its service providers on its behalf) will hold this information for a period of seven years after an Individual ceases to interact with the Company, unless it is obliged to hold it for a longer period under law or applicable regulations.

An Individual's Rights in relation to Personal Data

An Individual may at any time request a copy of his / her Personal Data from the Company. This right can be exercised by writing to the Company at the address specified below.

An Individual also has the right to correct any inaccuracies in, and in certain circumstances, to request erasure, or restriction on the use, of his / her Personal Data, and to object to certain uses of his / her Personal Data, in each case subject to the restrictions set out in applicable data protection laws. Further information on these rights, and the circumstances in which they may arise in connection with the Company's processing of Personal Data can be obtained by writing to the Company at the address specified below.

In any case where the Company is relying on an Individual's consent to process his / her Personal Data, that Individual has the right to change his / her mind and withdraw consent by writing to the address specified below.

Where the Company is relying on a legitimate purpose of the Company, a member of the Morgan Stanley group of companies or a third party recipient of the Personal Data, in order to use and disclose Personal Data, an Individual is entitled to object to such use or disclosure of his / her Personal Data, and if he /she does so, the Company will cease to use and process the Personal Data for that purpose unless the Company can show there are compelling legitimate reasons for it to continue or it needs to use the Personal Data for the purposes of legal claims.

In limited circumstances, an Individual may also have the right to data portability in respect of certain of his / her Personal Data, which means he / she can request that the Company provide it to him / her

in a structured, commonly used and machine-readable format, or transmit it to his / her third party nominee where this is technically feasible.

An Individual also has the right to lodge a complaint about the processing of his / her Personal Data by the Company with the Data Protection Commissioner or relevant supervisory authority.

Contacting the Company

Any queries or complaints regarding the use of the Personal Data by the Company and / or the exercise of individual rights should be addressed to the Distributor (details of which are set out in the prospectus in respect of the Company which is available at www.fundlogic.com).

Last updated 10 May 2018