

PRIVACY POLICY

1. Introduction

- 1.1 This is the Privacy Policy of Global X Management Company (Europe) Limited, which is referred to as the “**Company**”, “**us**” or “**we**” throughout this Privacy Policy. This Privacy Policy provides details of the way in which we Process Personal Data in line with our obligations under Data Protection Law.
- 1.2 Capitalised terms used in this Privacy Policy are defined in the Glossary in Annex I.

2. Background and Purpose

- 2.1 The purpose of this Privacy Policy is to explain what Personal Data we Process and how and why we Process it. In addition, this Privacy Policy outlines our duties and responsibilities regarding the protection of such Personal Data. The manner in which we Process Personal Data will evolve over time and we will update this Policy from time to time to reflect changing practices and will use reasonable endeavours to bring such changes to your attention.
- 2.2 In addition, in order to meet our transparency obligations under Data Protection Law, we will provide this Privacy Policy by reference in various points of data capture used by us e.g. subscription application forms etc.

3. The Company as a Data Controller and Data Processor

- 1.1 The Company will act as a Data Controller in respect of Personal Data provided to the Company by various individuals in connection with (i) the management, operation and administration of the funds managed by the Company (each a “**Fund**” and together, the “**Funds**”), (ii) the discretionary management of segregated mandate portfolios (“**Separate Portfolios**”), and (iii) using the Company’s permission to provide investment advice in relation to the marketing by the Company of its individual portfolio management services for Separate Portfolios and exchange traded products, ((ii) and (iii), the “**MiFID Services**”).
- 1.2 As described in the table below, the following types of Personal Data are processed by the Company for the following purposes:

Categories of Data Subject	Types of Personal Data	Purpose of Processing	Lawful Basis under GDPR
Shareholders /clients	Name, mailing and residential addresses, email address, telephone number, beneficiary name, nationality, date of birth, account number, bank account	To manage and administer a Shareholder’s holding in the Fund and/or any a client’s Separate Portfolio and any related accounts on an ongoing basis.	As required for the performance of the contract between the Shareholder and the Fund, the shareholder and the Company and a Separate Portfolio client and the Company (per Art. 6(1)(b) GDPR).

Categories of Data Subject	Types of Personal Data	Purpose of Processing	Lawful Basis under GDPR
	details, tax identification number.		
Shareholders/clients	Name, mailing and residential addresses, email address, telephone number, beneficiary name, nationality, date of birth, account number, bank account details, tax identification number.	To carry out statistical analysis and market research.	As necessary and proportionate in the Company's legitimate business interests in analysing market information (per Art. 6(1)(f) GDPR).
Shareholders/clients	Name, mailing and residential addresses, email address, telephone number, beneficiary name, nationality, date of birth, account number, bank account details, tax identification number.	To comply with legal and regulatory obligations applicable to the Shareholder, client and/or the Fund from time to time, without limitation, applicable tax, anti-money laundering and counter terrorist financing legislation. In particular, in order to comply with the Common Reporting Standard (as implemented in Ireland Section 891C and Section 891E to Section 891G (inclusive) of the Taxes Consolidation Act 1997 (as amended) and regulations made pursuant to those sections), Shareholders' or clients' personal data (including financial information) may be shared with the Irish tax authorities and the Revenue Commissioners. They in turn may exchange information (including personal data and	To comply with legal obligations to which the Company is subject (per Art. 6(1)(c) GDPR).

Categories of Data Subject	Types of Personal Data	Purpose of Processing	Lawful Basis under GDPR
		financial information) with foreign tax authorities (including foreign tax authorities located outside the European Economic Area). Please consult the AEOI (Automatic Exchange of Information) webpage on www.revenue.ie for further information in this regard.	
Directors and any other individuals performing “controlled functions” within the Company under the Central Bank of Ireland’s Fitness & Probity regime.	Name, mailing and residential addresses, email address, telephone number, date of birth, nationality, etc.	Compliance with the Central Bank of Ireland’s Fitness & Probity regime as required under the Central Bank Reform Act 2010.	To comply with legal obligations to which the Company is subject (per Art. 6(1)(c) GDPR).
Employees of the Company and other service providers to the Fund.	Name, mailing address, email address and telephone number, etc.	Performance of a service agreement between the Company or other service providers and the Fund.	As required for the performance of the contract between the Company or other service providers and the Fund (per Art. 6(1)(c) GDPR).

4. Special Categories of Data

The Company will not ordinarily obtain or Process Special Categories of Data (“SCD”), however, if in the very limited circumstances where it does so (for example, in relation to any data relating to the health of a director of the Company) it shall Process such Personal data in accordance with Data Protection Law.

5. Individual Data Subject Rights

5.1 Data Protection Law provides certain rights in favour of data subjects. The rights in question are as follows (the “Data Subject Rights”):

- (a) the right of access to Personal Data;
- (b) the right to amend and rectify any inaccuracies in Personal Data;
- (c) the right to erase Personal Data (right to be forgotten);
- (d) the right of data portability of Personal Data;

- (e) the right to restrict Processing;
- (f) the right to object to Processing;
- (g) the right to withdraw consent to Processing without affecting the lawfulness of Processing based on consent before its withdrawal;
- (h) where processing is based on consent, a right to withdraw that consent to processing; and
- (i) the right to object to automated decision making, including profiling.

5.2 These Data Subject Rights will be exercisable by data subjects subject to limitations as provided for Data Protection Law. Data subjects may make a request to the Company to exercise any of the Data Subject Rights by contacting the head of compliance, Laura Kearney lkearney@globalxetfs.com. Requests shall be dealt with in accordance with Data Protection Law.

6. Failure to provide Personal Data

In certain cases, the Company has contractual and statutory obligations to process Personal Data relating to you. In the event that you refuse to provide such Personal Data to the Company, the Company will not be able to provide you with its services.

7. Data Security and Data Breach

7.1 The Company undertakes to hold any Personal Data provided by Shareholders and client to whom the Company provides MiFID Services in confidence and in accordance with the Data Protection Law. Accordingly, we and our service providers have technical and organisational measures in place to protect Personal Data from unlawful or unauthorised destruction, loss, change, disclosure, acquisition or access. Personal Data are held securely using a range of security measures including, as appropriate, physical measures such as locked filing cabinets, IT measures such as encryption, and restricted access through approvals and passwords.

7.2 The GDPR obliges Data Controllers to notify the Data Protection Commission and affected data subjects in the case of certain types of personal data security breaches. Any Data Breaches identified in respect of Personal Data controlled by the Company will be dealt with in accordance with Data Protection Law and the Company's Data Breach Procedure.

8. Disclosing Personal Data

8.1 From time to time, we may be legally obliged under applicable laws to disclose Personal Data to third parties or allow third parties to access Personal Data which we Process. For example, where a law enforcement agency or regulatory authority submits a valid request for access to Personal Data or for the purposes of fraud prevention or investigation. In relation to Shareholders, the Company may be required to disclose Personal Data relating to U.S. Reportable Persons to the U.S. Internal Revenue Service for purposes of FATCA compliance.

8.2 We may also disclose Personal Data to delegates, professional advisors, service providers (e.g., investment managers, distributors, administrators and depositaries) regulatory bodies, auditors, technology providers and any of the respective related, associated or affiliated companies of the foregoing for the same or related purpose(s). Where we enter into agreements with third parties we will ensure that the appropriate

contractual provisions are in place where required by Data Protection Law. To the extent that such Processing is undertaken based on the instructions of the Company and gives rise to a Data Controller and Data Processor relationship, the Company will ensure that such relationship is governed by a contract which includes the data protection provisions prescribed by Data Protection Law.

9. Data Retention

We will keep Personal Data for as long as is necessary for the purposes of processing, which may be for:

- (i) the duration of the investment by a shareholder in the Fund or the agreement with a client to whom the Company provides MiFID Services and afterwards in accordance with the Company's legal and regulatory obligations and any applicable record retention policy of the Company;
- (ii) such period as may be deemed by us to be necessary in light of applicable statutory limitation periods; and
- (iii) otherwise only for as long as the retention of such Personal Data is deemed necessary for the purposes for which that Personal Data are Processed (as described in this Privacy Policy).

10. Data Transfers Outside the EEA

From time to time, the Company may transfer Personal Data to countries outside the EEA including the US and the UK, which may not have the same or equivalent Data Protection Law as Ireland. If such transfer occurs, the Company will ensure that such processing of Personal Data is in compliance with Data Protection Law and, in particular, that appropriate measures are in place such as an adequacy decision of the European Commission such as Commission Decision of 28 June 2021 in favour of the United Kingdom or for transfers to the US or Hong Kong, entering into standard contractual clauses (as published by the European Commission and amended or updated from time to time) or ensuring that the recipient is Privacy Shield certified, if appropriate.

11. Further Information/Complaints Procedure

Further information about this Privacy Policy and/or the Processing of Personal Data by or on behalf of the Company may be made available if necessary by contacting Laura Kearney, the Designated Person for Regulatory Compliance, at Laura Kearney lkearney@globalxetfs.com. While investors have a right to make a complaint in respect of compliance with Data Protection Law directly to the Irish Data Protection Commission, investors will be requested to contact Laura Kearney, the Designated Person for Regulatory Compliance, at Laura Kearney lkearney@globalxetfs.com in the first instance to give us the opportunity to address any concerns that they may have.

ANNEX I

Glossary

In this Privacy Policy, the terms below have the following meaning:

“Data Breach” means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise Processed.

“Data Controller” means the entity which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

“Data Processor” means the party that Processes Personal Data on behalf of the Data Controller.

“Data Protection Law” means the Irish Data Protection Acts 1988 to 2018 and the General Data Protection Regulation (No 2016/679) (**“GDPR”**) and any other laws which apply to the Company in relation to the Processing of Personal Data.

“European Economic Area” or **“EEA”** means Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, Iceland, Liechtenstein, and Norway.

“Personal Data” is any information relating to a living individual which allows the identification of that individual. Personal Data can include:

- a name, an identification number;
- details about an individual’s location; or
- any other information that is specific to that individual.

“Processing” means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. **“Process”** and **“Processing”** are interpreted accordingly.

“Special Categories of Personal Data” are types of Personal Data that reveal any of the following information relating to an individual: racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership. Special Categories of Personal Data also include the Processing of genetic data, biometric data (for example, fingerprints or facial images), health data, data concerning sex life or sexual orientation and any Personal Data relating to criminal convictions or offences.