



ALLIANCEBERNSTEIN®

ALLIANCEBERNSTEIN (LUXEMBOURG) S.À R.L. (“AB LUX” OR THE “MANAGEMENT COMPANY”)

DATA PROTECTION DISCLOSURE TO INVESTORS

Applicable to investment funds managed by AB Lux (the “Fund”)

Investors in Share/Units (“Investors”) are informed that certain data relating to them as natural persons or to other identified or identifiable natural persons - such as but not limited to their representatives and ultimate beneficial owners - (all together referred herein as the “Data Subjects”) and their holdings in Share/Units (the “Personal Data”) will be collected, stored and/or processed by the Fund and/or the Management Company acting on behalf of the Fund (acting as joint data controllers) and/or by the Transfer Agent, the Depository, the Paying Agent (if any) and/or certain of their affiliates (acting as data processors) (the “Relevant Parties”) for the purpose of facilitating subscriptions, payment of distributions, if any, redemptions, transfers and exchanges as a result of the Investor’s contractual relationship with the Fund, as well as for the purposes of Investors’ anti-money laundering and tax identification in this context, and in order to comply with their applicable legal obligations including but not limited to, prevention of terrorism financing, prevention and detection of crime, tax reporting obligations such as, but not limited to, FATCA and CRS (if any). The Personal Data will be processed (i) as a result of the contractual relationship between the Investor and the Fund and to provide related services to the Investors and/or (ii) to comply with applicable laws and regulations (including in situations where the Investor has no direct contractual relationship with the Fund).

Data Subjects are hereby informed that processing of Personal Data is required by the Relevant Parties for the proper performance of the services provided to the Fund and its Investors and to comply with applicable laws and regulations. Data Subjects are also informed that the Fund and/or the Management Company will not be in a position to service the Investors without processing Personal Data as described in this Section. For any additional information related to the processing of Personal Data, Data Subjects can contact the Data Protection Officer of the Management Company via post mail at “AllianceBernstein (Luxembourg) S.à r.l., to the attention of the Data Protection Officer, 2-4 rue Eugène Ruppert L-2453 Luxembourg (Grand Duchy of Luxembourg)” or via email at the following address: ABLuxDPO@alliancebernstein.com.

Processed Personal Data includes, but is not limited to, the name, address, email address, telephone numbers, tax information, business contact information, employment, personal financial information and investment history information and the Investors’ individual representatives and/or the Investors’ ultimate beneficial owner (as applicable). Personal Data is collected directly from the Investors, through public sources or through the Investors’ authorized intermediaries.

In connection therewith, Personal Data may be transferred, subject to applicable laws and regulations, to the Relevant

Parties, acting as data processors or as data controllers, which may be located in or outside the European Economic Area (“EEA”). Personal Data may therefore be transferred to entities located in countries which are not covered by an adequacy decision of the European Commission (such as, but not limited to, Singapore, Taiwan, India, Canada and United States of America) or where data protection laws might not exist or be of a lower standard than in the EEA. In particular, Data Subjects are informed that Personal Data may be stored in digital form on servers hosted in such third countries. Personal Data transfers may be carried out (i) based on binding corporate rules concluded within the AB Group and/or (ii) based on standard data protection clauses adopted by the European Commission and/or (iii) where such transfer is necessary for the performance of the services provided to the Fund and/or the Investor as a result of the signature of the Application Form, and/or (iv) where such transfer is necessary for the performance of the services based on a contract concluded between the Fund and/or the Management Company with a third party to which Investors are indirectly part and which is concluded in the Investors’ interest. A copy of safeguards listed under points (i) and/or (ii) above are available to Data Subjects upon request to the Data Protection Officer of the Management Company.

In addition, the Data Subjects are informed that the Relevant Parties may disclose and transfer Personal Data to third parties such as courts and/or legal, governmental or regulatory bodies including tax authorities, auditors and accountants in Luxembourg as well as in other jurisdictions for the purpose of complying with applicable laws and regulations, as long as an international agreement, such as a mutual legal assistance treaty, is in force between the requesting third country and the EEA or Luxembourg.

The Relevant Parties will take reasonable steps to ensure that Personal Data is recorded accurately and maintained in a secure and confidential format. Personal Data will be retained only as long as necessary for fulfilling the services required by Investors or in accordance with applicable laws and regulations.

Personal Data will be processed in compliance with the laws and regulations applicable in Luxembourg.

By submitting Personal Data to the Relevant Parties, the Investors represent that they have authority to provide that Personal Data to the Relevant Parties. If Investors are not natural persons, they undertake to: (i) inform any Data Subject that the Investors provide their Personal Data to the Relevant Parties, inform them about the processing of their Personal Data and their rights as described herein; and (ii) if required obtain in advance any consent for the processing of their Personal Data as described herein, in particular for the

transfer of Personal Data to recipients located outside the EEA and where data protection laws might not exist or be of a lower standard than in the EEA. The Management Company and the Fund may assume, where applicable, that the Data Subjects have, where necessary, given such consent and have been informed of the processing of their Personal Data and of their rights as described herein.

Personal Data will only be used for the purpose for which it was collected, unless the Investors are informed in advance of its use for a different purpose. The Investors (and where applicable, their Data Subjects) are entitled to request (i) the access to, (ii) the correction or completion, (iii) the erasure, (iv) a limitation of the processing of, (v) the portability of any Personal Data processed by the Fund and/or the Management Company, in the manner and subject to the limitations prescribed in applicable laws and regulations. Such request must be directed to the Data Protection Officer of the Management Company mentioned above.

Data Subjects are entitled to address any claim relating to the processing of their Personal Data carried out by the Fund and/or the Management Company in relation with the services provided in accordance with this Application Form to the relevant data protection supervisory authority (i.e. in Luxembourg, the *Commission Nationale pour la Protection des Données*).

Investors expressly recognize that the Relevant Parties processing Personal Data on their behalf will accept no liability with respect to unauthorized third party receiving knowledge of or having access to their Personal Data, except in case of gross negligence or serious misconduct by the Relevant Parties or by any of their respective employees, officers, affiliates, agents and sub-contractors.

Last update: March 17, 2021