

# Xtrackers (IE) plc

Investment Company with Variable Capital

Registered Office: 78 Sir John Rogerson's Quay, Dublin 2, Ireland

Registered Number: 393802

(the "Company")

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## Important Notice to Shareholders

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### Data protection information in accordance with the EU General Data Protection Regulation ("GDPR")

Dear Shareholder

The following information gives you an overview of the way in which we and other third parties may process your personal data and your rights under data protection law. The specific types of data processed, and how they are processed, are largely determined by the requested/agreed services in question.

#### 1. Who we are

We are Xtrackers (IE) plc, with a registered address at 78 Sir John Rogerson's Quay, Dublin 2, Ireland ("the **Company**"). The Company is a data controller in respect of your personal information that we process in connection with our business. In this Notice, reference to "we", "us" or "our" are references to the Company.

This Notice applies to you and to any third parties whose information you provide to us in connection with our relationship with you. Please ensure that a copy of this Notice is provided to any third parties whose personal data you provide to us. We may update this Notice from time to time and we will notify you in writing of any changes we make.

You, as an investor, remain responsible to inform any of your potential authorised representatives or beneficial owners about the existence and content of this Privacy Notice.

#### 2. The Types of Personal Data that we Process

Due to our contractual relationship with you, or in order to fulfil our legal obligations, we must collect certain personal information from you. If you do not provide this personal data to us, we may not be able to process your investor application or otherwise maintain a business relationship with you or provide you with our services.

We process some or all of the following types of personal data:

Name, address/other contact details (telephone, email address), date/place of birth, gender, nationality, language, marital status, legal capacity, professional group key/type of partnership (employed/self-employed), identification data (e.g. ID card data), authentication data (e.g. specimen signature), tax ID and information, FATCA status, current occupation or previous occupation if relevant and financial status (assets, liabilities, income from employment/self-employment/trade or business, expenses).

### 3. Why do we process your data (purpose of processing) and on what legal basis?

Your personal data will be processed to process, manage and administer your holding(s) and any related accounts, on an ongoing basis. This includes the assessment of your application, the management of your investment, and the provision of associated services to you (such as account statements or other communications relevant to your application or investment).

We process your personal data for the purposes above to the extent necessary to perform our contractual obligations to you.

In addition, we are subject to various legal obligations or statutory requirements (e.g. Companies Act 2014, European Union (Anti-Money Laundering: Beneficial Ownership of Corporate Entities) Regulations 2016, tax laws) as well as supervisory requirements (e.g. of the Central Bank of Ireland). We will process your personal data to the extent necessary to comply with our legal obligations, with such processing including identity verification, prevention of fraud and money laundering and compliance with monitoring and reporting duties required by tax law.

We may also ask for your specific consent to the processing of your personal data for other specific purposes (e.g. to provide marketing or more general information about our services to you). You will have the right to withdraw such consent at any time.

We may also process your personal data in furtherance of our legitimate business interests, which include:

- Assertion of legal entitlements and defence in the event of legal disputes;
- Ensuring IT security and IT operations of the Company;
- Prevention of criminal acts;
- Measures for business control and the further development of products;
- Risk management.

In assessing our legitimate interests listed above, we consider that the processing of your personal data in furtherance of these objectives does not prejudice your interests, fundamental rights or freedoms as a data subject. If you wish to obtain additional information in relation to this, please get in contact with us (see '**Questions and Concerns**').

Where processing is based on the furtherance of our legitimate interest, you have the right to object to this processing of your personal data.

### 4. Disclosure of your information

Your personal data will be disclosed to, and processed by, State Street Fund Services (Ireland) Limited, which will be the administrator of your investment(s) for the purposes of this Notice, and is acting as registrar and transfer agent for the Company.

To the extent necessary to perform our services and fulfil our contractual obligations to you, we will disclose your personal data to:

- Deutsche Asset Management S.A., Luxembourg, acting in its capacity as the management company of the Company or any of its related companies, affiliates or duly authorised agents;
- State Street Custodial Services (Ireland) Limited, acting in its capacity as depositary or any of their duly authorised agents;
- Deutsche Asset Management (UK) Limited, acting in its capacity as the distributor for the Company or any of their duly authorised agents;
- Deutsche Asset Management Investment GmbH, acting in its capacity as investment manager, or any of their duly authorised agents;

- Dave Burns, Carne Global Financial Services Limited, and any appointed successor, acting in his capacity as money-laundering reporting officer;
- International Financial Data Services (Canada), in its capacity as provider of information technology applications;
- Syntel Services Privacy Limited, which will assist with operations, including account set-up;
- Victor Buck Services S.A., as issuer of contract notes, monthly statements and other update information;
- DST Financial Services International Limited, in its capacity as provider of information technology applications;
- State Street Bank and Trust, which will assist with client account opening;
- Other credit and financial services institutions, comparable institutions and order processors, to which we transfer personal data for the purpose of managing and administering the Company and managing our investment relationship with you;
- The Central Bank of Ireland, the Irish Revenue Commissioners and any other public or regulatory entities or institutions which we are required to disclose your data to pursuant to a legal requirement; and
- Other third parties including professional, legal or financial advisors, auditors and/or technology providers.

We take all reasonable steps to ensure the safety and integrity of your personal information and may, as appropriate, enter into contracts with such third parties to protect the privacy and integrity of any personal data supplied to us.

## 5. Keeping your information secure

We take all reasonable steps to ensure the safety, privacy and integrity of your personal data. We ensure that we have appropriate technical, organisational and security measures, appropriate to the sensitivity of your information to ensure it is secure.

## 6. Transfers outside the European Economic Area

We will transfer your personal data to countries outside the European Economic Area if this is necessary for the performance of our contractual obligations to you, or to the extent that this is required by law. Transfers to countries outside the European Economic Area will, to the extent required, be made to Australia, Canada, Japan, Hong Kong, India, Singapore, Thailand and the United States.

For any transfers of your personal data outside the European Economic Area, we will ensure that appropriate safeguards are in place, which might include one or more of the following:

- The country which we are transferring the personal data to may be approved by the European Commission as offering an adequate level of data protection;
- The recipient of the data may have signed 'standard contractual clauses' approved by the European Commission, obliging them to protect the personal data;
- If the recipient is located in the United States, it might be a certified member of the EU-US Privacy Shield (or such equivalent scheme approved by the appropriate regulatory bodies from time to time).

We may also transfer your personal data to countries outside the European Economic Area where we have obtained your consent to do so. You will be entitled to withdraw such consent at any time.

You can obtain more information about data transfers, appropriate safeguards and standard contractual clauses by contacting us (see '**Questions and Concerns**').

## 7. How long is my data stored for?

We will retain your data for as long as our business relationship with you is continuing. We will also retain your personal data for as long as necessary to comply with any legal requirements (including retention requirements for anti-money laundering purposes). If you have any questions, please contact us (see '**Questions and Concerns**').

## 8. What data protection rights do I have?

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below);
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes;
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it;
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us in writing (see '**Questions and Concerns**').

## 9. Questions and Concerns

If you have any questions or concerns about how we handle your personal data, further information can be obtained from State Street Fund Services (Ireland) Limited (78 Sir John Rogerson's Quay, Dublin 2, Ireland), acting in its capacity as administrator and transfer agent of the Company (by emailing [taregistration.eb@statestreet.com](mailto:taregistration.eb@statestreet.com) or [ETF\\_Servicing@statestreet.com](mailto:ETF_Servicing@statestreet.com)).

If you are unhappy with how we are handling your personal data, or how we respond to a query/complaint about the processing of your personal data, you have the right to make a complaint to the Irish Data Protection Commissioner, or any other relevant privacy regulator.