

**DB ETC Plc**  
**(the Company)**  
**Privacy Notice**

This privacy notice explains the manner in which the Company collects, processes and maintains personal data about you pursuant to the Data Protection Law.

**You should review this notice carefully as it contains information about the treatment of your personal data and your rights under the Data Protection Law.**

Interpretation: For the purposes of this privacy notice: (i) **Data Protection Law** means the Data Protection (Jersey) Law 2018, as amended from time to time (ii) **data controller, data processor, data subject, personal data, and processing** shall have the meanings given to them under the Data Protection Law, (iii) **we, us or our** means the Company in its capacity as data controller of the personal data, and (iv) **you or your** means the securityholder under the Secured ETC Precious Metal Linked Securities Programme (the **Programme**) (the **investor**) and includes any person owning or controlling the investor, having a beneficial interest in the investor, or for whom the investor is acting as agent or nominee. For the avoidance of doubt, **Processor** (as defined below) shall include Deutsche Bank AG, London Branch (and its affiliates) acting as arranger and distributor in relation to the Programme in its capacity as processor of the personal data, and Computershare Investor Services (Jersey) Limited (**Computershare**) acting as registrar of the Company in its capacity as processor of the personal data.

**Sources of personal data:** Personal data includes identifiers such as: name, date of birth, gender, address, email address, nationality, tax identification number (**TIN**), financial and investment qualification, shareholder reference number, national identification number, telephone/mobile number, fax number, bank details, and power of attorney details.

The Company collects personal data about investors mainly through the following sources:

- (a) subscription forms, investor questionnaires and other information provided by the investor in writing (including any anti-money laundering, identification, and verification documentation), in person, by telephone (which may be recorded), electronically or by any other means;
- (b) from third party vendors, transfer agencies, financial intermediaries and/or financial administrators including but not limited to Computershare;
- (c) transactions within the Programme, including account balances, investments, distributions, payments and withdrawals; and
- (d) we may also collect personal data relating to you from credit reference agencies and available public databases or data sources, such as news outlets, websites and other media sources and international sanctions lists.

**Purposes:** The storage, processing and use of personal data will take place for the following purposes:

*Where the processing is necessary for compliance with a legal obligation to which the Company is subject*

- (a) to comply with in-house procedures and statutory/regulatory requirements applicable to the Company (including (where applicable) under FATCA, CRS, AML legislation and customer due diligence verification purposes).

*Where the processing is necessary for the Company to perform a contract to which you are a party or for taking pre-contract steps at your request*

- (a) to manage or administer your investment and any related accounts on an ongoing basis;
- (b) to administer and operate the Programme and/or the Company;
- (c) risk management and risk controlling purposes relating to the Company or any entity in the same group as the Company.

*Where the processing is necessary in order to pursue the Company's legitimate interests*

- (a) to carry out statistical analysis or market research;
- (b) for direct marketing purposes;
- (c) to help detect, prevent, investigate, and prosecute fraud and/or other criminal activity, and share this data with our legal, compliance, risk and managerial staff to assess suspicious activities;
- (d) to investigate and respond to any complaints about us and to help maintain service quality and train staff to deal with complaints and disputes.

*Where you consent to the processing of personal data*

- (a) for any other specific purpose to which you have given specific consent.

As a data controller, we will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

### **Automated decision-making**

We do not envisage that any decisions will be taken about you using fully automated means, however we will notify you in writing if this position changes.

**Disclosure of personal data:** Any disclosure of personal data shall be in accordance with the obligations of the disclosing party under the Data Protection Law. Further:

- (a) where you have notified us of your adviser, the personal information provided may be shared with such adviser. You must notify us in writing if you no longer wish us to share your personal information with your adviser or of any change to your

adviser. Your adviser should have its own arrangements with you about its use of your personal information;

- (b) if we undergo a group reorganization or are sold to a third party, the personal information provided to us may be transferred to that reorganized entity or third party and used for the purposes highlighted above;
- (c) we may share your personal information with companies or other entities or persons affiliated with the Company and any third party to whom the Company may delegate certain functions in relation to the Company which may include an administrator, registrar, distributor and/or other service providers (**Processors**) for the purposes set out in this Privacy Notice;
- (d) in the course of the processing of personal data such personal data may be transferred to Processors situated or operating in countries outside of Jersey and the European Economic Area, and such countries may not have data protection laws equivalent to those in Jersey and the EEA. The Company will, where required to do so by law or where it considers appropriate, implement contracts which seek to ensure that any such entity is contractually bound to provide an adequate level of protection in respect of the personal data transferred to it.

**Investor rights:** you have the right to:

- (a) access your personal data;
- (b) correct your personal data where it is inaccurate or incomplete;
- (c) restrict under certain circumstances the further processing of your personal data;
- (d) ask for erasure of your personal data under certain circumstances;
- (e) object to the use of your personal data (including for direct marketing purposes);
- (f) ask for personal data portability under certain circumstances.

Further, you may at your discretion refuse to communicate personal data to the Company or object to some processing of your personal data. There are situations where the Company can refuse to comply with such a request, for example, where it is subject to a legal obligation to process the data. The Company may also reject your investment or withhold payments until such time as the requisite data has been provided.

Where the processing is based on your consent, the withdrawal of consent shall not affect the lawfulness of processing for other reasons and based on other grounds where this is permitted under applicable law.

**Exercise of rights:** You may exercise your rights by writing to the Company at the following e-mail address: [privacy@dws.com](mailto:privacy@dws.com).

**Complaints:** Should you have any unresolved complaints in relation to the retention or processing of personal data, you may lodge a complaint with the Data Protection Authority in Jersey: Tel +44 (0)1534 716530 or at [www.OICJersey.org](http://www.OICJersey.org).

**Retention of Personal Data:** The personal data shall not be held by the Company for longer than necessary with regard to the purposes of the data processing, subject to any limitation periods provided by law.

**Changes to Privacy Notice:** The Company reserves the right to update this Privacy Notice at any time, and will ensure that any update to this privacy notice is made available on its website [www.etc.dws.com](http://www.etc.dws.com). We encourage you to regularly review this and any updated Privacy Notice to ensure that you are always aware of how personal data is collected, used, stored and disclosed. We may also notify you in other ways from time to time about the processing of your personal data.