

GDPR PRIVACY NOTICE

HARDING LOEVNER

COMMITMENT TO CLIENT PRIVACY

Harding Loevner (“**we**”, “**us**”, “**our**”) is committed to protecting the privacy of our clients. The purpose of this GDPR¹ Privacy Notice is to inform our clients of the details of our privacy practices to the extent that they are in scope of the GDPR.

Harding Loevner LP will be a data controller in respect of personal data about you that is collected in the context of sending certain ‘LiveSend’ communications to you (as described further below).

Harding Loevner (UK) Limited will be a data controller in respect of personal data about you where, as a result of servicing, marketing or support activities performed by Harding Loevner (UK) Limited in respect of your role as an investor, client or contact of Harding Loevner LP (or a director, officer, employee and/or owner of an investor, client or similar contact), you have a relationship with Harding Loevner (UK) Limited. Where Harding Loevner (UK) Limited has shared personal data with Harding Loevner LP, Harding Loevner LP may also be a data controller of your personal data.

COLLECTION, RETENTION, USE AND DISCLOSURE OF PERSONAL DATA

We collect, maintain and use personal information in connection with the provision of investment advisory services to you. The types and categories of information we collect, maintain and use include:

- Information (e.g., name, address, contact details, identification number, account numbers, and financial information) that we receive from you to provide investment advisory services;
- Information we receive from professional advisers authorised to act on your behalf (such as accountants, investment consultants and attorneys, if applicable);
- Information that we generate to service your account (e.g., account statements); and
- Information that we may receive from third parties with respect to your account (such as trade confirmations and other reports from brokerage firms and custodians).

We use this information to:

- correspond with you (this is in our legitimate interests in responding to your enquiry or otherwise communicating with you);
- provide investment advisory services to you (this is necessary for the performance of your contract with us);
- send you electronic marketing communications through our e-mail distribution list, where you have consented to this, or as otherwise permitted by the law. You can opt-out at any time by using the opt-out mechanism available in our messages (where we

¹ GDPR refers to the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016) with effect from 25 May 2018, and the UK version of the GDPR

need your consent for this, we rely on that consent, otherwise this is in our legitimate interests in promoting our products and services);

- send certain documents to you via Seismic's 'LiveSend' feature, which provides you with a link to access the document. If you consent, we will receive information about when and where you opened the content, and how long it and its pages were viewed for. This is to help us analyse how and when content is viewed, to help us improve content and its delivery;
- carry out anti-money laundering checks and prevent fraud, terrorist financing, bribery, corruption, tax evasion (this is for compliance with our legal obligations and our legitimate interests in complying with law and regulation applicable to us);
- report tax related information to tax authorities (this is for compliance with our legal obligations and our legitimate interests in complying with law and regulation applicable to us);
- maintain our records (this is in our legitimate interests in conducting our business in a proper manner).

In addition to the uses above, please note that we may also process your information where required by law to do so, or if we reasonably believe that it is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

The retention period for this information is determined by factors such as legal or regulatory requirements and industry guidelines.

We disclose your personal information to non-affiliated third parties only in limited instances and then only in connection with providing investment advisory services to you. Some of the instances are listed below:

- Disclosures to companies that perform services on our behalf (such as IT consultants, accounting firms, and other vendors) subject to agreements that prohibit such companies from disclosing or using the information other than for the services required or as permitted by law;
- Disclosures at your direction to your professional advisers (such as your accountant, attorney and appointed consultant, if applicable);
- Disclosures necessary to provide investment advisory services and client services to your account (such as providing account and trade information to custodians and brokers); and
- Disclosures required by law, for example for anti-money laundering purposes or to tax authorities.

INTERNATIONAL TRANSFERS OF PERSONAL DATA

As Harding Loevner LP is established in the United States, your personal information will be processed in the United States. The disclosure of personal information to third parties may also involve the transfer of data to the United States and other jurisdictions outside the European Economic Area (EEA) and United Kingdom. Such countries may not have the same data protection laws. Any transmission of personal information by Harding Loevner LP and its subsidiaries or its delegates outside the EEA or UK shall be in accordance with the conditions in the EU General Data Protection Regulation (2016/679/EC) and UK General Data Protection Regulation. If you require further information about the measures we have in place, you can request it from the contact details at the bottom of this notice.

For example, we may share personal information with our subsidiaries, such as Harding Loevner (UK) Ltd. for legitimate business purposes. Also, as an affiliate of Affiliated Managers Group, Inc. (AMG), we may share information with AMG about our experiences or about transactions with clients or their accounts.

Where we require your personal information to comply with Anti-Money Laundering (AML) or other applicable legal or regulatory requirements, failure to provide this information means that we may not be able to accept you as a client.

SECURITY OF CLIENT INFORMATION AND ACCESS LIMITATIONS

Harding Loevner LP has policies and procedures in place that are designed to safeguard the confidentiality of personal information. These include:

- Physical, technical and administrative safeguards designed to keep your personal information confidential and secure;
- Limitation of access to personal or non-public information both physically and electronically; and
- Requiring third parties that perform services for us to keep information confidential and secure.

YOUR RIGHTS

Where the processing of your personal data is within scope of the GDPR, you have certain rights in relation to access and control of your personal information under certain circumstances. We will respond to requests for information and, where applicable, will correct, amend, or delete your personal information where required.

Under the GDPR your rights include:

- The right to be informed;
- The right of access;
- The right to rectification;
- The right to erasure;
- The right to restrict processing;
- The right to data portability;
- The right to object; and
- Rights related to automated decision making.

In the limited circumstances where you may have provided your consent to the processing of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

You also have the right to make a complaint at any time to a supervisory authority for data protection issues.

If you have any questions concerning this Privacy Notice please contact Brian Simon, Harding Loevner's Chief Compliance Officer, at Legal&Compliance@hlmnet.com.

August 2022