EDMOND DE ROTHSCHILD

FOR PE/RE CLIENTS / OCTOBER 2025

EDRAM(LUX) - OUTSOURCING and/or PERSONAL DATA SUB-PROCESSING DEDICATED TO PRIVATE EQUITY AND REAL ESTATE FUNDS

OUTSOURCED AND/OR PERSONAL DATA SUB-PROCESSING SERVICES TO SERVICE PROVIDERS/SUB-PROCESSORS APPOINTED BY EDMOND DE ROTHSCHILD ASSET MANAGEMENT (LUXEMBOURG) ("**EDRAM(LUX)**"):

Country of establishment of the Service Provider/Sub-Processor	**Category(ies) of outsourced services**	**Is the relevant entity a sub-processor appointed by EDRAM(LUX)[1] to conduct specific personal data sub-processing activities within the meaning of GDPR?**	**Type of information transmitted or made available**
(EDR Group entity) Luxembourg and (service provider's sub-contractors) Suisse France	- IT services - archiving & document destruction services	yes in the context of the following outsourced services: - archiving & document destruction services (name of the appointed entity: Edmond de Rothschild (Europe))	client data, client financial data and/or personal data relating to any relevant natural persons whose personal data is processed and transmitted or made available by EDRAM(LUX) in the context of the outsourced services
(service provider external to EDR Group) Luxembourg and (service provider's sub-contractors) Ireland France Germany United States of America [2]	- accounting services (bookkeeping and periodic closing of accounts, annual accounts)	yes (name of the appointed entity: RSM Financial Services Luxembourg)	
(service provider external to EDR Group) Luxembourg	- desktop publishing, printing, enveloping and mailing services	yes (name of the appointed entity: Victor Buck Services)	

[1] *EDRAM(LUX) acting as **processor** (within the meaning of GDPR) in accordance with the provisions of its service agreements*

[2] *Countries with no processing of client's personal data*

(service provider external to EDR Group) France and (service provider's sub-contractors) United States of America	if applicable (in the context of investor portal services): - provision of a communication and exchange portal for clients and investors	yes (name of the appointed entity: eFront Financial Solutions, Inc.)	client data, AML/FCT investor data, client financial data and/or personal data relating to any relevant natural persons whose personal data is processed and transmitted or made available by EDRAM(LUX) in the context of the outsourced services
(service provider external to EDR Group) Luxembourg and (service provider's sub-contractors) France Madagascar [2]	If applicable: - provision of an invoicing portal for the processing and validation of invoices	yes (name of the appointed entity: Numen Europe)	client data, invoicing data and/or personal data relating to any relevant natural persons whose personal data is processed and transmitted or made available by EDRAM(LUX) in the context of the outsourced services