EDMOND DE ROTHSCHILD

FOR TRADITIONAL CLIENTS / MAY 2026

EDRAM (LUX) - OUTSOURCING and/or PERSONAL DATA SUB-PROCESSING FOR TRADITIONAL CLIENTS

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?[2]**	**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) Canada [4] Malaysia [4] France [4] Spain [4]	- central administration services - investment restrictions and policies monitoring support services - KIID services - FATCA & AEOI services - invoicing & VAT services - IT support services	yes in the context of the following outsourced services: - central administration services - FATCA & AEOI services - Invoicing & VAT services (name of the appointed entity: CACEIS Bank, Luxembourg Branch)	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. Relevant data to comply with KYC requirements
(service provider external to EDR Group) Luxembourg	- desktop publishing, printing, enveloping and mailing services	yes (name of the appointed entity: Victor Buck Services)	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

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

[2] *if applicable, the (global) distributor of the Fund, to which EDRAM(LUX) (acting as **processor** in accordance with the provisions of the relevant (global) distribution agreement) has delegated marketing/distribution functions, is a sub-processor appointed by EDRAM(LUX) to conduct specific personal data sub-processing activities within the meaning of GDPR*

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

4 Countries with processing of client's personal data. The IT servers remain hosted in Luxembourg and France.

** This service is limited to a few dedicated clients.*

(EDR Group entity)
 	
France
	if applicable in the context of EOS & Manco services:
	- data management, middle office and IT subcontractor and project management services
	
	if applicable:
	- Fund Structuring Engineering services*: review of prospectus projects (creation of funds, compartments, new classes, amendments to the prospectus, articles of incorporation, mergers, liquidation of funds, compartments, of classes,…)
	- Project Management services*: Monitor projects
		Yes
		Edmond de Rothschild (France)
			client data and/or client financial data

(service provider external to EDR Group) Luxembourg and (service provider's sub-contractors) France Madagascar [3]	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