

INVESTOR PRIVACY NOTICE

PERSONAL DATA PROTECTION POLICY

Last updated on 2 June 2026

Accolade Fund SICAV p.l.c., with registered office at Vision Exchange Building, Territorials Street, Mriehel, Birkirkara, Malta, BKR 3000, is incorporated in accordance with the laws of the Republic of Malta. The Manager of Accolade Fund SICAV p.l.c. and its sub-funds is **Accolade Investment Company Limited** (C 94600), with registered office at Vision Exchange Building, Territorials Street Zone 1, Central Business District, Birkirkara, Malta, 1070, incorporated in accordance with the laws of the Republic of Malta, authorised by the Malta Financial Services Authority (“MFSA”) to provide investment services pursuant to Directive 2011/61/EU.

Accolade Fund SICAV p.l.c. and Accolade Investment Company Limited are hereinafter collectively referred to as “**we**”/“**our**”.

We are committed to protecting your right to privacy. If you wish to contact us regarding our personal data protection measures, please contact us in writing at the above address or by email at investors@accoladefunds.eu. You may also contact us by telephone at +420 220 303 019.

Please read this Personal Data Protection Policy carefully so that you fully understand our procedures for handling your personal data.

The terms “Data Controller”, “Data Subject”, “Personal Data”, “Process”, “Processed”, “Processing”, “Data Protection Officer” and “Data Processor” are used in this notice with the meanings defined by the Applicable Laws and shall be interpreted accordingly. “Applicable Laws” means the relevant personal data protection and privacy legislation, in particular EU Data Protection Regulation 2016/679/EU, data protection laws and relevant legislation subject to any amendments. Any undefined capitalised terms used herein shall have the meaning set out in the Offering Memorandum prepared by Accolade Fund SICAV p.l.c. dated 28 September 2018.

1. UPDATES

We may update this Personal Data Protection Policy in response to any amendments to the Applicable Laws or changes in data processing. We will notify you of any such changes prior to the commencement of the relevant processing.

2. WHAT DOES PERSONAL DATA INCLUDE?

The term “Personal Data” includes all identifiable information about you, such as your first name, surname, address, and any other information that may be processed and that may uniquely identify you.

3. HOW DO WE COLLECT PERSONAL DATA?

We are the Controllers of your Personal Data and will process such Personal Data in connection with your investment in the Fund/sub-funds of Accolade Fund SICAV p.l.c. (the “Fund”), and/or for the other purposes set out in this notice.

Your Personal Data may have been provided to us directly by you, or by third parties such as our agents and business partners. In some cases, we may also collect your Personal Data from third-party sources, such as online search engines or public registers.

We generally collect and process Personal Data for the following purposes:

- as part of onboarding and servicing new clients of the Fund, including any Personal Data collected prior to your subscription for shares in the Fund, any information provided in or in connection with the Subscription Agreement, and any documents or information you are required to provide to us for the purpose of your investment (Art. 6(1)(b) GDPR);
- any information provided to us in connection with any redemption, exchange or transfer of shares in the Fund (Art. 6(1)(b) GDPR);
- to provide you with legally required statements and/or reports (Art. 6(1)(c) GDPR);
- detection and prevention of fraud and other criminal activity which we are legally required to report (Art. 6(1)(c) GDPR);
- development and improvement of our systems, products and services (Art. 6(1)(f) GDPR);
- compliance with legal requirements and obligations, including inter alia MiFID II (Directive 2014/65/EU), where relevant, AIFMD (Directive 2011/61/EU), the Directive on preventing the use of the financial system for money laundering or terrorist financing (Directive 2015/849/EU), FATCA and CRS obligations and other obligations imposed on us by Applicable Laws (Art. 6(1)(c) GDPR);
- security and safety measures that are necessary or required, including but not limited to the security of our premises, property and employees/officers, and the initiation, conduct and defence of litigation (Art. 6(1)(f) GDPR);
- legitimate interests pursued by us or a third party, where such interests are not overridden by your interests, fundamental rights and freedoms (you may object to such processing) (Art. 6(1)(f) GDPR); and
- providing the Accolade Funds Placce web and mobile application service, through which users can access their executed contractual documentation with us, administrator statements and other relevant documentation (Art. 6(1)(b) GDPR); and/or
- use of cookies on our website and in the Accolade Funds Placce application. Cookies are small text files stored on your device when you visit a website. Technical (necessary) cookies are required for the proper functioning of the website and are processed on the basis of our legitimate interest (Art. 6(1)(f) GDPR). For all other types of cookies (analytical, marketing, preference) we require your consent (Art. 6(1)(a) GDPR). You may grant, refuse or change your consent at any time via the cookie banner displayed on the relevant website or application. Detailed information on individual cookies, their purpose and storage duration is available through the cookie settings on the relevant website.

Regardless of the manner in which we have collected your Personal Data, we will only process, for any purpose, such data as is related to your investment and/or a purpose that is inextricably linked thereto, including the purpose of complying with any legal and regulatory obligations imposed on us.

4. LEGAL BASIS FOR PROCESSING PERSONAL DATA

Your Personal Data is processed on the following legal basis:

- entering into and performance of the contract in connection with your investment in the Fund upon execution of the subscription documents. It is necessary to provide such Personal Data in order to invest in the Fund. If we did not process such data, you would not be able to invest in the Fund (Art. 6(1)(b) GDPR);
- our legitimate interests — in particular legitimate interests that may arise directly or indirectly in connection with your instructions and in connection with sending you updated information about the Fund. We also have a legitimate interest in processing your Personal Data for security and safety reasons. When processing Personal Data on the basis of our legitimate interests, we

ensure that our interests do not override your legitimate interests, rights and freedoms (Art. 6(1)(f) GDPR);

- your explicit consent, in which case processing is limited solely to the purposes stated in the relevant consent request (Art. 6(1)(a) GDPR); or
- compliance with legal obligations imposed on us — in particular those arising from MiFID II (Directive 2014/65/EU), where relevant, AIFMD (Directive 2011/61/EU), the Directive on preventing the use of the financial system for money laundering or terrorist financing (Directive 2015/849/EU), FATCA and CRS obligations and other obligations imposed on us by Applicable Laws (Art. 6(1)(c) GDPR).

On the basis of our legitimate interests or compliance with applicable legal obligations, we may also process your Personal Data for the purposes of establishing, exercising or defending legal claims.

5. RECIPIENTS OF YOUR PERSONAL DATA

We may share your Personal Data with the following third parties:

- the administrator of Accolade Fund SICAV p.l.c. and its sub-funds, Alter Domus Services Malta Limited, registration number C 50530, with registered office at Vision Exchange Building, Territorials Street, Zone 1, Central Business District, Birkirkara, CBD 1070 Malta, which acts as a controller of your personal data; further information on the processing of personal data by AlterDomus is available [here](#);
- Accolade, s.r.o., with registered office at Sokolovská 394/17, Karlín, 186 00 Praha 8, Czech Republic, registration number: 278 51 371, registered in the Commercial Register maintained by the Municipal Court in Prague, file reference C 146043, which acts as a processor of your personal data in connection with the provision of the Accolade Funds Placce web and mobile application service; further information on the processing of personal data by Accolade, s.r.o. is available [here](#);
- specific individuals within our organisation who require such data in the performance of their work;
- our contractual service providers, such as providers of IT, website management, audit, accounting, legal, tax and administrative services, as well as services related to the management of our registered office, always only to the extent necessary for the fulfilment of individual processing purposes and on the basis of an appropriate legal title for processing Personal Data;
- business partners to whom we may be required to transfer your Personal Data at your request;
- third parties to whom we may be required to disclose data pursuant to obligations imposed on us by law;
- your beneficiaries, intermediaries, correspondent and intermediary banks; and
- appointed Managers, Portfolio Managers, Compliance Officers, Money Laundering Reporting Officers, Prime Brokers, Custodians, Investment Researchers and/or Distributors (who are occasionally appointed), acting as our contractual Processors for the collection, storage and processing of Personal Data relating to prospective investors and shareholders.

A specific list of recipients of Personal Data is available in its current version upon request via the contact details provided above. We do not share your Personal Data with any person based outside the EU or EEA without your explicit instruction and consent.

6. AUTOMATED DECISION-MAKING AND PROFILING

Your Personal Data will not be used for any decision-making carried out by automated means without human intervention, including profiling.

Prior to your investment in the Fund and during the investment, we may obtain information from you, inter alia for the purpose of complying with our obligations and, where applicable, for another purpose connected with the Subscription Agreement or other related documents. We may process such personal data for the performance of the Subscription Agreement and/or legal obligations. As stated above, our use of such systems will not result in any automated decision-making.

7. DATA RETENTION

We will retain your Personal Data for the duration of your investment in the Fund and for the further period for which their retention is required by Applicable Laws. Your Personal Data will subsequently be destroyed, unless we have a legal obligation or business need to retain such Personal Data, or require such Personal Data for the establishment or defence of legal claims.

Personal Data that we retain on the basis of your consent will be retained only until your consent is withdrawn.

8. YOUR RIGHTS

In connection with your Personal Data, you have the following specific rights during the period of retention of your Personal Data:

- Right of access — you have the right to find out what Personal Data we hold about you and to receive a copy of such Personal Data;
- Right to lodge a complaint — you have the right to lodge a complaint with the supervisory authority for personal data protection concerning the processing of your Personal Data. In the Czech Republic, this is the Office for Personal Data Protection (contact details provided below);
- Right to erasure — in certain cases, you may request the erasure of Personal Data we hold about you;
- Right to object — you have the right to object and to request that we cease processing your Personal Data in cases where we rely on our legitimate interest or the legitimate interest of a third party in processing your Personal Data;
- Right to data portability — you may request that we provide you with certain Personal Data you have provided to us in a structured, commonly used, machine-readable format (except where such data has been provided to us in handwritten form, in which case such Personal Data will be provided to you upon request in that handwritten form). Where technically feasible, you may request that we provide such Personal Data to a third party designated by you as a controller;
- Right to rectification — you have the right to update or correct any inaccurate Personal Data we hold about you;
- Right to restriction — you have the right to request that we cease using your Personal Data in certain cases, including where you believe we are processing your Personal Data unlawfully or that the Personal Data we hold is inaccurate;
- Right to withdraw consent — where our processing is based on your consent. Withdrawal of consent will not affect the lawfulness of processing based on your consent prior to its withdrawal; and
- Right to be informed of the source — where the Personal Data we hold about you was not provided to us directly by you, you also have the right to be informed of the source from which your Personal Data originates.

Please note that your rights in relation to your Personal Data under Articles 12 to 22 of the GDPR are not absolute and we may not be able to comply with your request if Applicable Laws prevent us from doing so or if they may be restricted in accordance with Article 23(1) of the GDPR.

Please note that we will contact you and keep you regularly informed about legal updates, commercial news and send you newsletters solely on the basis of your explicit consent. In this regard, you have the right to withdraw your consent at any time. You may exercise the rights set out in this section via the contact addresses and telephone number provided above, or through the AlterDomus Data Protection Officer at dataprotection@alterdomus.com or by telephone at +356 22 05 1000.

9. SECURITY OF YOUR DATA

Taking into account the nature, scope, context and purposes of processing, as well as the varying likelihood and severity of risks to the rights and freedoms of natural persons, we will implement and maintain appropriate and sufficient technical and organisational security measures to protect your Personal Data against possible unauthorised, accidental or unlawful destruction or loss, alteration, disclosure or access of Personal Data transmitted, stored or otherwise processed, and will be solely responsible for implementing such measures.

We will ensure that our employees who process your data are informed of such technical and organisational measures and are bound by an obligation of confidentiality with respect to your Personal Data.

The technical and organisational security measures referred to in this provision designate specific security measures aimed at protecting your Personal Data in accordance with all privacy and personal data protection laws.

10. COMPLAINTS

If you wish to lodge a complaint regarding the manner in which we process your Personal Data, you may contact us at any of the contact telephone numbers or addresses provided above. You also have the right to lodge a complaint with the supervisory authority, which for the Czech Republic is the Office for Personal Data Protection, Pplk. Sochora 27, 170 00 Praha 7 (www.uoou.cz) and for the Republic of Malta is the Office of the Information and Data Protection Commissioner (www.idpc.gov.mt).

11. PERSONAL DATA OF DATA SUBJECTS PROVIDED BY THIRD PARTIES

If you are a company, intermediary or other legal entity (including a bank or broker) and you provide us with Personal Data of a third party in the position of a data subject, such as your employees, affiliated persons, service providers, affected clients/customers, directors or other persons associated with your business, you will be solely responsible for ensuring that:

- you immediately inform such Data Subjects of this Personal Data Protection Policy and direct them to it;
- the collection, transfer, provision and Processing of such Personal Data is fully compliant on your part with Applicable Laws;
- as Data Controller of the Personal Data, you retain full responsibility towards the Data Subjects and are obliged to comply with all Applicable Laws;
- prior to providing us with the Personal Data of Data Subjects, you collect all necessary notices, approvals, consents and other required documents;
- you remain responsible for the accuracy and currency of the information provided to us and are obliged to notify us immediately of any changes.

You hereby fully release us from liability and undertake to fully indemnify us, on the first written request, in respect of any expenses, damages or any obligations arising from any (commenced or threatened) actions or litigation brought against us as a result of your having provided us with the above-mentioned Personal Data.