

# **GDPR PRIVACY NOTICE**

## **HARDING LOEVNER LP**

### **COMMITMENT TO CLIENT PRIVACY**

Harding Loevner LP is committed to protecting the privacy of our clients. The purpose of this GDPR<sup>1</sup> Privacy Notice is to inform our clients of the details of our privacy practices.

### **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 we receive from you to provide investment advisory services (such as name, address, identification number, account numbers, and financial information);
- 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).

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 service 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.

### **INTERNATIONAL TRANSFERS OF PERSONAL DATA**

The disclosure of personal information to third parties may involve the transfer of data to the United States and other jurisdictions outside the European Economic Area (EEA). Such countries may not have the same data protection laws. Any transmission of personal

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<sup>1</sup> 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.

information by Harding Loevner LP and its subsidiaries or its delegates outside the EEA shall be in accordance with the conditions in the EU General Data Protection Regulation (2016/679/EC).

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 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**

We respect your right to access and control your personal information. We will respond to requests for information and, where applicable, will correct, amend, or delete your personal information unless legal or regulatory restrictions prevent us from doing so.

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.

If you have any questions concerning this Privacy Notice please contact Lori Renzulli, Harding Loevner's Chief Compliance Officer, at [Legal&Compliance@hlmnet.com](mailto:Legal&Compliance@hlmnet.com).

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