

BRANDES INVESTMENT FUNDS PLC

DATA PRIVACY NOTICE

In accordance with the General Data Protection Regulation (697/2016/EU) (the “**GDPR**”) and applicable Irish data protection legislation¹ (collectively, “**Data Protection Legislation**”) Brandes Investment Funds plc (the “**Fund**”) being a data controller, must provide you with information on how the personal data that you provide as part of your subscription to shares in the Fund will be processed by the Fund, its service providers and delegates and their duly authorised agents and any of their respective related, associated or affiliated companies.

As a consequence of your investment, the Fund acting as a data controller may itself (or through third parties including but not limited to State Street Fund Services (Ireland) Limited (the “**Administrator**”), Brandes Investment Partners (Europe) Limited (the “**Manager**”), State Street Custodial Services (Ireland) Limited and Brandes Investment Partners, L.P. together with any sub-distributors that may be appointed from time to time (collectively the “**Distributor**”), local paying agents and mailing firms appointed by any of the foregoing (together the “**Service Providers**”))² process your personal information or, to the extent that you are a non-natural person, that of your directors, officers, employees, intermediaries and/or beneficial owners. Save where otherwise expressly provided, any reference in this Data Privacy Statement to “you” or “your” in the context of processing personal data of data subjects shall be understood to mean and relate to the personal data of your directors, officers, employees, intermediaries and/or beneficial owners as the context may require.

In certain circumstances, the Manager and the Administrator may itself use your personal data for its own purposes and as a result be considered a data controller of such data. In such circumstances, all rights afforded to you as a data subject under the GDPR shall be solely exercisable against Manager and the Administrator.

In this regard, please note the following:

Purposes of Processing and Legal Basis for Processing

The personal data collected from you or provided by you or on your behalf in connection with your holdings in the Fund will be collected, stored, disclosed, used and otherwise processed by the Service Providers on behalf of the Fund for the purposes outlined in the table below.

<i>Processing Activity by or on behalf of the Fund</i>	<i>Legal Basis for Processing</i>
Where you are a natural person, managing and administering your holdings in the Fund and any related account on an ongoing basis	Performance of the contract between the Fund and you
Where you are a natural person, disclosures to third parties such as auditors, regulatory authorities, tax authorities and technology providers in the context of the day to day operations of the Fund	Performance of the contract between the Fund and you

¹ including: (i) the Data Protection Acts 1988 and 2003 and/or any other applicable legislation or regulations implementing Directive 95/46/EC, (ii) the European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011, (iii) the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016), including any amendments thereto, and any consequential national data protection legislation, and (iv) any guidance and/or codes of practice issued by the Irish Data Protection Commissioner or other relevant supervisory authority, including, without limitation, the European Data Protection Board, in each case as amended, supplemented or replaced from time to time

² A full list of all categories of processors who will process data on behalf of the Fund should be provided

<i>Processing Activity by or on behalf of the Fund</i>	<i>Legal Basis for Processing</i>
Where you as an investor are a non-natural person, disclosures to third parties such as auditors, regulatory bodies, tax authorities and technology providers in the context of the day to day operations of the Fund	Pursuing the legitimate interests of the Fund in managing and administering the holdings of the non-natural person in the Fund and any related account on an ongoing basis
Complying with any applicable legal, tax or regulatory obligations imposed on the Fund including legal obligations under Fund law, the UCITS Regulations ³ , CBI UCITS Regulations ⁴ , under tax law and under anti-money laundering / counter terrorist financing legislation	Compliance with a legal obligation to which the Fund is subject
Efficiently manage its directors and its relationship with its Fund Service Providers and other service providers	Performance of the contract between the Fund and relevant party
(i) Carrying out statistical analysis and market research; (ii) Recording, maintaining, storing and using recordings of telephone calls and electronic communications that you make to and receive from the Fund, the Service Providers and their delegates or duly appointed agents and any of their respective related, associated or affiliated companies for any matters related to investment in the Fund, dispute resolution, record keeping, security and/or training purposes; and (iii) direct marketing purposes ⁵ .	Pursuing the legitimate interests of the Fund including: (i) improve and/or tailor services to Shareholders and will assist the Fund to grow its assets under management, meaning that the interests of the Fund and the Data Subject in this case are aligned; (ii) identifying investor preferences to assist with product development and will assist the Fund to grow its assets under management, meaning that the interests of the Fund and the Data Subject in this case are aligned. Further information relating to the balancing test undertaken by the Fund in respect of such processing is available upon request.

The Manager and the Administrator as a data controller of your personal data may also collect, store, disclose, use or otherwise process your personal data for the purposes outlined in the table below.

<i>Processing Activity by Manager</i>	<i>Legal Basis for Processing</i>
Retaining AML and other records (for example, KYC and tax) received in connection with your investment in the Fund	Compliance with a legal obligation to which the Manager is subject, being those legal obligations imposed on it under AML/CTF legislation and regulatory obligations under its authorisation by the Central Bank of Ireland;
Retaining AML and other records (for example, KYC and tax) received in connection with your investment in the Fund	Pursuing the legitimate interests of Manager including: (i) Assisting with any subsequent suitability screening of you in connection with your

³ European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations, 2011 (as may be further amended consolidated or substituted from time to time)

⁴ the Central Bank (Supervision and Enforcement) Act 2013 (Section 48(1)) (Undertakings for Collective Investment in Transferable Securities) Regulations 2015, as may be amended, supplemented or replaced from time to time issued by the Central Bank

⁵ relating to the marketing of other sub-funds within the umbrella fund

<i>Processing Activity by Manager</i>	<i>Legal Basis for Processing</i>
	<p>investment in other funds or products managed by the Manager</p> <p>Further information relating to the balancing test undertaken by the Manager in respect of such processing is available upon request.</p>

<i>Processing Activity by Administrator</i>	<i>Legal Basis for Processing</i>
Retaining AML and other records received in connection with your investment in the Fund	Compliance with Applicable Laws (such as but not limited to conducting the know your customer checks for anti-money laundering purposes and conducting sanctions screening, in each case which the relevant State Street Contracting Entity is required to conduct under applicable laws, regulation or internal policies);
Retaining AML and other records received in connection with your investment in the Fund	Compliance with any request made by any financial services regulator or other public authority or governmental body having jurisdiction over a State Street Contracting Entity, Approved Sub-Processor or a relevant State Street Parent Entity.

Please note that where personal data is processed for purposes of legitimate interests, you have a right to object to such processing and the Fund and its appointed Service Providers will no longer process the personal data unless it can be demonstrated that there are compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Consent

Your consent is not required to process your personal data for the purposes referenced above. However, in order to process your personal data for the purposes outlined below, the Fund and the Manager seek your consent.

Consent to Direct Marketing by the Manager or entities within its group

The Fund and the Manager seek your consent to the transfer of your personal data to, and use by, the Manager and other entities within its group to send you information about other investment products or investment services by letter, by telephone, by email or by other reasonable means of communication.

You have a right not to receive such information. If you consent to receive such information and / or marketing material, please tick here and provide your contact details below:

Consent to transfer of your personal data to the Administrator who may use such data for its own purposes

The Fund and the Administrator seek your consent to the transfer of your personal data to, and use by, the Administrator for the purposes of (i) complying with its legal obligations under relevant AML/CTF legislation and/or (ii) assisting in any subsequent AML screening carried out by it in connection with your investment in any other fund or product administered by the Administrator on behalf of its other clients.

You have a right not to permit the Administrator to use your personal data for such purposes.

If you consent to the use of your personal data by the Administrator for such purposes, please tick here and provide your contact details below:

Please return this section by hand, post or courier, for the attention of Data Privacy Manager, c/o Brandes Investment Partners (Europe) Limited, 36 Lower Baggot Street, Dublin 2, Ireland or by e-mail at UCITSprivacy@brandes.com at your earliest convenience.

FIRST NAME: _____ LAST NAME: _____

ADDRESS: _____

PHONE NUMBER: _____

EMAIL ADDRESS: _____

You have a right to withdraw the consent(s) provided above at any time. However, your withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal. You can withdraw your consent by contacting the Fund using the details outlined under “Contact Us” below.

You also have a right to object to the processing of your personal data by the Fund or the Manager or any other entity within its group for direct marketing purposes.

The performance of this contract with the Fund is **NOT** conditional on your consent to direct marketing.

Profiling and Screening

The Fund and its appointed Service Providers may engage in PEP screening and financial sanctions screening programs defined by the European Union (“EU”), the United Nations (“UN”), Her Majesty’s Treasury (“HMT”) and the Office of Foreign Assets Control (“OFAC”) for the purposes of complying with the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 as may be amended or replaced from time to time and with UN, EU and other applicable sanctions regimes. The implementation of such PEP screening and financial sanctions screening programmes may result in the Fund or its Service Providers refusing an application for Shares in the Fund or delaying or refusing to make any redemption payment or distribution payment to you if you, your directors or any beneficial owner of your Shares appear on such screening programmes. In the event that you are identified as a PEP as a result of the screening process, you may be required to provide additional information and/or documentation to the Fund or its Service Providers. Such processing, which may reveal your political opinion, is considered lawful on the grounds of substantial public interest permitted under Article 9(2)(g) of the GDPR.

Undertaking in connection with other parties

By providing personal data to the Fund, you undertake to be authorised to disclose to the Fund relevant information applicable to the beneficial owner of the investment, to your directors and authorised signatories and to persons that own, directly or indirectly, an interest in the Fund. In this respect you confirm that you have provided these persons with all the information required under applicable data protection law, notably regarding their data protection rights, and received from these persons their authorisation for the processing and transfer of their personal data to us.

Disclosures to Service Providers and / or Third Parties

Personal data relating to you which is collected from you or provided by you or on your behalf may be handled by Service Providers appointed by the Fund and its or their duly appointed agents and any of related, associated or affiliated companies within the Brandes/State Street group(s) for the purposes specified above.

These Service Providers will be obliged to adhere to the data protection laws of the countries in which they operate.

The Fund and/or the Manager/Administrator may disclose your personal data to other third parties where required by law or for legitimate business interests. This may include disclosure to third parties such as auditors and the Central Bank of Ireland, regulatory bodies, taxation authorities and technology providers.

Transfers Abroad

Personal data collected from you or provided by you or on your behalf may be transferred outside of Ireland including to companies situated in countries outside of the European Economic Area (“**EEA**”) which may not have the same data protection laws as in Ireland. These countries include United States of America, Canada, Singapore, India and Hong Kong.

Where data transfers outside of the EEA take place, the Fund and/or the relevant Service Provider have taken the necessary steps to ensure that appropriate safeguards have been put in place to protect the privacy and integrity of such personal data, in particular the implementation of binding corporate rules between companies within the Brandes/State Street group and/or ensuring the implementation of model contracts by the Service Providers and their affiliate. Please contact the Fund at UCITSprivacy@brandes.com should you wish to obtain information concerning such safeguards.

Data Retention Period

The Fund and its appointed Service Providers will retain all information and documentation provided by you in relation to your investment in the Fund for such period of time as may be required by Irish legal and regulatory requirements, being at least six years after the period of your investment has ended or the date on which you had your last transaction with us.

The Manager and the Administrator will retain all information and documentation provided by you for Manager and the Administrator for for such period of time as may be required by Irish legal and regulatory requirements, being at least six years after the period of your investment has ended or the date on which you had your last transaction with them.

Your data protection rights

Please note that you have the following rights under the GDPR. In each case, the exercise of these rights is subject to the provisions of the GDPR:

- (i) you have a right of access to and the right to amend and rectify your personal data.
- (ii) you have the right to have any incomplete personal data completed.
- (iii) you have a right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you carried out by the Fund infringes the GDPR.
- (iv) you have a right to be forgotten (right of erasure of personal data).
- (v) you have a right to restrict processing.
- (vi) you have a right to data portability.

- (vii) you also have the right to object to processing where personal data is being processed for direct marketing purposes and also where the Fund or a Service Provider is processing personal data for legitimate interests.

Where you wish to exercise any of your data protection rights against the Fund or against the Manager and/or the Administrator, please contact us via the details provided below under “Contact Us”.

The Fund or its Service Provider will respond to your request to exercise any of your rights under the GDPR in writing, as soon as practicable and in any event **within one month** of receipt of your request, subject to the provisions of the GDPR. The Fund or its Service Provider may request proof of identification to verify your request.

Failure to provide personal data

As outlined in the section titled “**Purposes of Processing and Legal Basis for Processing**”, the provision of personal data by you is required for us to manage and administer your holdings in the Fund and so that we can comply with the legal, regulatory and tax requirements referenced above. Where you fail to provide such personal data in order to comply with anti-money laundering/counter terrorist financing or other legal requirements, in certain circumstances, we may be prohibited from making redemption or any applicable dividend payments to you **and/or** may be required to discontinue our business relationship with you by compulsorily redeeming your shareholding in the Fund.

Contact us

If you have any questions about the Fund’s, Managers and/or the Administrators use of your personal information, please contact designated person of the Manager responsible for compliance at the following email address/using the following contact telephone number:-

UCITSprivacy@brandes.com
00 353 1 6182700