

Manulife Global Fund

Société d'investissement à capital variable

Registered office: 31, Z.A. Bourmicht, L-8070 Bertrange

Grand Duchy of Luxembourg

(the “Company”)

Luxembourg, 5 October 2023

Please be informed that your Personal Data (as defined below) may be collected, recorded, stored in digital form or otherwise, adapted, transferred or otherwise processed and used in accordance with the law of 1 August 2018 on the organization of the National Data Protection Commission and the implementation of the GDPR, the European Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation or “GDPR”) and any other European Union or national legislation which implements or supplements the foregoing.

In this privacy notice, references to “we”, “us” or “our” are references to the Company, acting as controller with respect to the Personal Data.

This privacy notice applies to you and to any third parties whose information you provide to us in connection with our relationship with you, such as your authorized representatives or beneficial owners (the natural persons whose Personal Data we process being referred to as “Data Subjects”). Please ensure that a copy of this privacy notice is provided to any third parties whose Personal Data (as defined below) you provide to us. You also confirm that you have obtained the valid consent from third parties whose information you provide to us (in connection with your investment in the Company) for the collection and processing of their personal data in accordance with the Privacy Notice, where applicable. We may update this privacy notice from time to time and we will notify you in writing of any changes we make. Please also ensure that any Data Subjects whose information you provide to us in connection with our relationship with you are notified of such updates. If you have any questions concerning this Privacy Notice, please contact our Data Protection Officer at Manulife Investment Management (Ireland) Limited whose registered address

is at Second Floor, 5 Earlsfort Terrace, Dublin D02 CK83, Ireland, dpo_europe@manulifeam.com.

You, as a Data Subject, remain responsible to inform any of your potential authorised representatives or beneficial owners about the existence and content of this privacy notice.

1. Which categories of Personal Data are concerned?

“Personal Data” includes data regarding an individual’s identification such as name and first name, date of birth, place of residence, fiscal domicile, address, nationality, telephone number, email address, bank account details, tax number and copies of ID or passport. For the avoidance of doubt, in case of investors which are companies, Personal Data includes personal data of individuals linked to such companies.

2. Where do we obtain Personal Data about you?

Personal Data may be collected, used and stored by us from the following sources:

- i. information provided verbally, electronically or in writing, including information provided on subscription forms, questionnaires, websites and other forms provided by Data Subjects or the company to which they are linked;
- ii. information that is generated in the course of the business of the Company as an investment company which qualifies as an undertaking for collective investment in transferable securities (UCITS);
- iii. information obtained from international sanctions lists, publicly available websites, financial market infrastructures (including settlement service providers, central securities depositaries, exchanges, central clearing counterparties and other similar entities) and other public data sources;

- iv. the performance of contracts that may be entered into by the Company with Data Subjects, the companies they are linked to or third parties (as described below) from time to time;
- v. the use of products and services and your relationship with us, as well as with our affiliates, including members of the Manulife Group (being Manulife Financial Corporation and its subsidiaries and affiliates); and
- vi. information that may be received from third parties, being:
 - a. Manulife Investment Management (Ireland) Limited acting as the management company of the Company;
 - b. the following distributor and sub-distributors (collectively “Distributors” and each a “Distributor”):
 - Manulife Investment Management (Ireland) Limited (the “General Distributor”)
 - Manulife Investment Management (Hong Kong) Limited
 - Manulife Investment Management (Singapore) Pte. Ltd.
 - Manulife Investment Management (Taiwan) Co., Limited
 - Manulife Investment Management (US) LLC
 - Manulife Investment Management (Ireland) Limited
 - c. Citibank Europe plc, Luxembourg Branch acting as the administrator, registrar and paying agent of the Company (the “Administrator, Registrar and Paying Agent”); and
 - d. Manulife Investment Management (Hong Kong) Limited acting as platform administration services provider in respect of the Company.

3. Why do we process your Personal Data?

The Personal Data will be processed by us and/or on our behalf (including by the above-mentioned third parties) if necessary for the purposes of:

- i. performance of contracts, including:

- a. processing subscription, redemption and switching orders for shares in the Company;
 - b. payments of dividends and other distributions to shareholders;
 - c. maintaining the register of shareholders of the Company;
 - d. account and distribution fees administration;
 - e. cash movements for transactions settlement purposes;
 - f. calculation and payment of trailer fees remuneration; and
 - g. reconciliation of cash accounts;
- ii. compliance with applicable legal and regulatory obligations which the Company is subject to, such as in relation to:
 - a. anti-money laundering and terrorism financing;
 - b. know your client (KYC) obligations;
 - c. crime detection, prevention, investigation and prosecution;
 - d. tax identification in accordance with applicable legal obligations, including pursuant to the U.S. Foreign Account Tax Compliance Act (“FATCA”) and the Organisation for Economic Co-operation and Development’s Common Reporting Standard for the Automatic Exchange of Information (“CRS”) and any relevant regulations in connection therewith; and
 - e. any applicable supervisory requirements.
- iii. the legitimate interest of the Company (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms):
 - a. assessing and managing risk (in order to determine and manage levels of risk to which the Company is exposed);
 - b. monitoring and recording of calls and electronic communications for quality, security, training, investigation and fraud prevention purposes (to improve the quality of the Company’s services and products, ensure the

security of the Company and its business, and detect and protect against fraud); and

c. production of quality and activity reports (to improve the Company's services and products).

We may also rely on consent as a legal basis for processing of the Data Subject's Personal Data. If consent is relied on, it will be made clear to the Data Subject at the time his/her consent is asked for. The Data Subject will have the right to withdraw such consent at any time.

4. To whom do we disclose your Personal Data?

Generally, we will not provide Personal Data to outside firms, organisations or individuals, unless it is required in the normal course of business, or as otherwise permitted or required by law, or on request from an applicable regulator.

We may disclose certain Personal Data, on a "need to know" basis:

- i. to Manulife Investment Management (Ireland) Limited acting as the management company of the Company;
- ii. to Citibank Europe plc, Luxembourg Branch acting as the Administrator, Registrar and Paying Agent of the Company;
- iii. to Citibank Europe plc, Luxembourg Branch acting as the depositary of the Company;
- iv. to any Distributor;
- v. to any member of the Manulife Group in connection with any internal risk, compliance and reporting and/or administrative services processes and policies, in particular Manulife Financial Corporation, Manulife Investment Management (US) LLC, Manulife Investment Management (Hong Kong) Limited and Manulife Investment Management (M) Berhad;

- vi. to any bank or other party with whom the Company conducts or intends to conduct business that has requested such information;
- vii. to the government of Luxembourg (or to other foreign fiscal or tax authorities, as applicable) as well as to other public authorities (including supervisory or regulatory authorities) in order to comply with any applicable Luxembourg law and the obligation of the Luxembourg government (or other foreign fiscal or tax authorities, as applicable) to automatically exchange information as outlined above, and for the avoidance of doubt, including to any other governmental or regulatory authority, including tax authorities, in the European Economic Area, in any country which is a participating jurisdiction from time to time under CRS or in the United States of America;
- viii. to any competent regulatory, prosecuting, tax or governmental authority having jurisdiction over us or our affiliates or any regulatory authority that requests such information in connection with any proposed investment or disposition of an investment;
- ix. in connection with any litigation or other dispute or otherwise as necessary or appropriate to enforce the interests of the Company;
- x. to our, our affiliates' or the above-mentioned third parties' directors, officers, employees, agents, administrators, attorneys, legal and tax advisors, accountants or other professional service providers (including administrative support providers and processors);
- xi. to other persons as required by any law, rule or regulation or in response to any legal process; and
- xii. otherwise as the Company deems reasonably necessary for the conduct of the Company's business.

Access to Personal Data is restricted to those employees who need to know that information to provide services to the Company and its investors. We will require third party service providers to protect the confidentiality and privacy of your Personal Data and to use the information only for the purpose for which the disclosure is made. For this purpose, service providers receiving Personal Data are bound by agreement with us to keep Personal Data secure.

5. Where do we transfer your Personal Data?

Processing Personal Data for the purposes mentioned above may involve the transfer of Personal Data to third parties located outside the European Union, in countries where data protection laws might not exist or be of a lower or different standard than in the European Union, including the United States, India and Hong Kong.

We and any service provider acting on our behalf will ensure that a transfer of your Personal Data to these countries is carried out in compliance with the GDPR. Suitable safeguards are put in place ensuring that such transfer is carried out in compliance with the GDPR. A copy of such safeguards can be requested from the Company's Data Protection Officer or the relevant Distributor.

Your Personal Data will be transferred to the United States, India and Hong Kong based on standard data protection clauses adopted by the European Commission.

6. How long do we keep your Personal Data?

We will collect only such information that is useful and required for the performance of the services we provide to you. Any Personal Data may be held for a period of up to 10 years after the termination of the relationship between you and the Company and in any event no longer than necessary with regard to the purpose of the data processing or as required by law.

7. Who is responsible for your Personal Data?

The Company, acting in its capacity as data controller in relation to your Personal Data, will be responsible for the lawful processing of your Personal Data.

We ensure the confidentiality, privacy and security of your Personal Data. Physical, electronic and procedural safeguards are maintained to protect any Personal Data.

8. What are the Data Subject's rights in relation to Personal Data?

Under certain circumstances, the Data Subject has the right, in accordance with the GDPR, to:

- i. request access to his/her Personal Data and to request a copy of the Personal Data processed by or on behalf of the Company free of charge or subject to an administrative charge if the Data Subject's request is excessive or manifestly unfounded. This enables the Data Subject to receive a copy of the Personal Data we hold about him/her and to check that we are lawfully processing it;
- ii. request the rectification of his/her Personal Data in case of inaccuracy or incompleteness. This enables the Data Subject to have any incomplete or inaccurate information we hold about him/her corrected;
- iii. request the erasure of his/her Personal Data. This enables the Data Subject to ask us to delete or remove Personal Data where the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed. The Data Subject also has the right to ask us to delete or remove his/her Personal Data where the Data Subject has exercised his/her right to object to processing;
- iv. request the restriction of the processing of his/her Personal Data. This enables the Data Subject to ask us to suspend the processing of Personal Data about him/her, for example if the Data Subject wants us to establish its accuracy;
- v. receive the Personal Data concerning him/her, which he/she has provided to us, in a structured, commonly used and machine-readable format and have those Personal Data transmitted to another controller without hindrance from us, where the processing is based either on the Data Subject's consent or on a contract;
- vi. lodge a complaint in relation to data protection issues with the relevant data protection authorities in the member state of the European Economic Area where the Data Subject lives or works, or where the alleged infringement of the GDPR or of the Luxembourg law of 1 August 2018 occurred. In Luxembourg, the competent authority is the Luxembourg data protection authority, the Commission Nationale de la Protection des Données, with its address at 15, Boulevard du Jazz

L-4370 Belvaux (Tel.: (+352) 26 10 60-1 <https://cnpd.public.lu/en/droits/faire-valoir/formulaire-plainte.html>);

vii. withdraw his/her consent at any time (without this withdrawal affecting the lawfulness of processing prior to the withdrawal) in cases where his/her Personal Data has been processed on the legal basis of consent;

viii. object to the processing of his/her Personal Data, at any time and free of charge, where we are relying on a legitimate interest (or that of a third party) and there is something about the Data Subject's particular situation which makes the Data Subject want to object to processing on this ground. The Data Subject also has the right to object where we are processing his/her Personal Data for direct marketing purposes.

To exercise these rights, to withdraw his/her consent, to object to the processing of his/her Personal Data or for any other data protection queries, the Data Subject can contact the Company's Data Protection Officer or the relevant Distributor.

9. Miscellaneous

If a Data Subject fails to provide such information in a form which is satisfactory to the Company, opposes the aforementioned processing of his/her Personal Data or withdraws his/her consent to such data processing, the Company may restrict or prevent any business relationship with the Data Subject.