

# European Union Privacy Policy

The following privacy disclosures provide information about the collection, use, processing, and sharing of data about individuals located in the European Union. These disclosures apply only to the use of Personal Data in the GDPR processing activities of Kopernik Global Investors, LLC (“Kopernik”) and its affiliated funds (collectively, “we”). These Disclosures apply to GDPR processing activities by electronic means, such as the collection of data through our website or electronic mail.

Defined terms:

“GDPR” means the European Union’s General Data Protection Regulation.

“Personal Data” means information that relates to an individual who is directly or indirectly identified or identifiable.

## **How We Collect and Use Personal Data**

### Personal Data We Collect

- Name
- Address
- E-mail Address
- Birth Date
- Drivers’ License Number
- Social Security Number (if applicable)
- Tax Identification Number
- Signature
- Bank Account Information
- Company Information
- Job title

### How We Collect Data

In order to provide you with individualized service, we collect Personal Data about you from information you provide on applications or other forms and information about your relationship with us. We also collect information such as your e-mail address, phone number, address, job title, and company information from non-clients through inquiries by mail, e-mail, telephone, or through the Kopernik subscription form found on Kopernik’s website on which you may subscribe to receive market commentary. Finally, we collect information about you from your emails or phone calls, such as your name, e-mail address, birth date, or other Personal Data that you may share.

## **How We Use Personal Data**

We use the Personal Data that we collect to carry on various institutional activities such as managing your account, communicating with you about your account, providing account statements, alerting you about a safety or security announcement, responding to subpoenas or other legal actions, enforcing our agreements, and taking action regarding (or providing notice of) fraud or other unlawful activity. As described in more detail below, we rely on your consent to lawfully process your Personal

Data. We will retain your Personal Data for as long as is necessary for the purposes set out in these disclosures, unless a longer period is required under applicable law, or is needed to resolve disputes or protect our legal rights or otherwise comply with legal obligations.

### **Legitimate Interests**

We rely on several legitimate interests in using and sharing your Personal Data. These interests include:

- Furthering research and understanding of the ways our services are used;
- Maintaining an ongoing relationship with clients and prospective clients;
- Exploring ways to develop and grow our business;
- Cybersecurity;
- Administration of our operations;
- Enhancing protection against fraud, intellectual property infringements, crime and security risks; and
- Meeting our obligations and enforcing our legal rights.

### **How We Share and Disclose Personal Data**

We do not disclose any Personal Data about you to anyone, except as permitted by law. So that we may continue to offer you products and services that best meet your investing needs, and to effect transactions that you request or authorize, we disclose the information we collect, as described above, to companies that perform administrative or marketing services on our behalf, such as transfer agents, or printers or mailers that assist us in the distribution of investor materials. With respect to individuals that subscribe to receive emails containing Kopernik commentary and materials, Personal Data including the individual's name, email address, physical address, telephone number, job title, and company will be shared with companies hired to assist with the distribution of the material you have requested to receive. These companies will use this information only for the services for which we hired them and are not permitted to use or share this information with anyone for any other purpose. Kopernik will disclose Personal Data in circumstances where Kopernik believes in good faith that a disclosure is required under applicable law, to cooperate with regulators, or to cooperate with law enforcement authorities. When we are processing Personal Data based on your consent, we generally will retain the information for the period of time necessary to carry out the processing activities to which you consented by sharing your information with Kopernik, subject to your right, under certain circumstances, to have your Personal Data erased.

### **Your Rights**

Under the GDPR, individuals located in the European Union are entitled to the following:

- The right to access – the right to request that Kopernik share copies of your Personal Data. We may charge you a small fee for this service.
- The right to rectification – the right to request that Kopernik correct any information the individual believes is inaccurate or incomplete.
- The right to erasure – the right to request that Kopernik erase your personal data, under certain conditions.

- The right to restrict processing – the right to request that Kopernik restrict the processing of your personal data, under certain conditions.
- The right to object to processing – the right to object to Kopernik’s processing of your personal data, under certain conditions.
- The right to data portability – the right to request that Kopernik transfer the data that it has collected to another organization, or directly to you, under certain conditions.

If you make a request related to your data, Kopernik will have one month to respond to you. If you would like to make a request concerning your data, please call us at 1-813-314-6100 or send an email to [info@kopernikglobal.com](mailto:info@kopernikglobal.com). In order to avoid taking action regarding your Personal Data at the direction of someone other than you, we will ask you for information verifying your identity. If you withdraw your consent to the use or sharing of your Personal Data, then you may not have access to all or any of the services that we provide. Following a request to delete your Personal Data, we may retain and continue to process the data to the extent permitted or required by applicable law.

### **Updates To This Policy**

Kopernik may update or revise this policy at any time and without prior notice by posting a revised policy to Kopernik’s website.