

## PART A: HOW WE USE YOUR PERSONAL INFORMATION

**At Franklin Templeton, we care about your privacy and value the trust you place in us when you share your personal information.**

Accordingly, we wanted to let you know how we deal with the personal information you give us or is given to us by a third party. The aim of this Notice is to explain to you - as Data Subject - what kind of personal information we gather on you, why and how we process it as data controller. Data protection laws will change on 25th of May 2018, with the implementation of the EU GDPR (General Data Protection Regulation). This Notice sets out your rights with regard to this new EU regulation.

From time to time, we may update this Notice, and any new version will be posted on our website. We recommend you regularly review it to ensure that you are always aware of our privacy practices.

Our privacy commitments to you:

- We will keep your data safe and private
- We will ensure that you can exercise your rights
- We will train our employees to properly manage your personal information

### 1. To whose personal information does this Notice apply?

This Notice describes our practices when using:

- i) the personal information of individuals based in the European Economic Area (EEA) or individuals outside the EEA to whom our group companies offer our services, including but not limited to individuals who have invested in the relevant Funds at Franklin Templeton (both of which are listed in Part B of this Notice) or are account holders;
- ii) the personal information of our external directors either based in the EEA or appointed to Funds marketed by Franklin Templeton in the EEA;
- iii) the personal information of the customers of, suppliers to, and firms which refer clients to, our group companies in the EEA; and
- iv) the personal information of persons based in the EEA (1) who may visit Our Websites which are intended for access from within the EEA ("Our Website") as indicated by our country menu or on the webpage itself or (2) who may visit our social media sites.

### 2. What personal information are we collecting and why?

Data Protection laws say that we are allowed to use personal information (including sharing such information with third parties) where we have a proper reason to do so.

Accordingly, we must have one or more of the following reasons:

- To fulfil a contract we have with you;
- When it is our legal duty;
- When it is in our legitimate interest\*;
- When you consent to it.

(\* ) *Our legitimate interest is when we have a business or commercial reason to use the information. However, it must not unfairly go against what is right and best for you.*

In general, we may collect the following types of personal information you give us or through our third parties:

- Identification data, such as name, sex, age/date of birth, place of birth, contact details including address (private and professional), phone number (private and professional), email (private and professional);

- Profession, job title and position;
- Signature;
- Nationality or Civil status;
- Photograph;
- Passport information or other national identification number;
- Tax identification such as National Insurance Number;
- Personal bank account and financial information such as account identification and number, income and (for professional investors) financial licence;
- Information about the account holders' or investors' transactions;
- Account history with us;
- Financial details such as fees paid and bank account details;
- Financial licence, dealer number and dealer name;
- "Politically Exposed Person" status, criminal convictions and potentially source of wealth relating to an investment;
- Dealer number and dealer name;
- Communications including emails, telephone calls and letters.

Depending on your Data Subject profile the reasons for processing your personal information may be different. Further information for each Data Subject profile can be found in section 8.

We also collect personal information about users through Our Website, and Franklin Templeton web pages on social media sites such as Twitter and LinkedIn, and you can refer to section 9 for more information.

### 3. What are your Rights?

Individuals have the following rights, under certain circumstances, in relation to their personal information:

- Right to access personal information
- Right to rectify personal information
- Right to restrict the use of personal information
- Right to request that personal information is erased
- Right to object to processing of personal information
- Right to data portability (in certain specific circumstances)
- Right to lodge a complaint with a supervisory authority.

If you - as an individual - wish to exercise these rights, you can download an Individual Rights Request form which is available at [www.franklintempletonglobal.com/rights-request-form.pdf](http://www.franklintempletonglobal.com/rights-request-form.pdf), or contact us through the address referred to in Part B of this Notice.

A summary of each right and how you can take steps to exercise it is set out below.

Where we receive a request to exercise one of these rights, we shall provide information on the action we take on the request without undue delay and in any event within one month of receipt of the request. This may be extended by a further two months in certain circumstances, for example where requests are complex or numerous.

The information will be provided free of charge, except where requests are manifestly unfounded or excessive, in particular because of their repetitive character. In these circumstances we may charge a reasonable fee or may refuse to act on the request. We will advise you of any fees prior to proceeding with a request.

We may ask for additional information to verify your identity before carrying out a request.

Where we do not carry out a request, we shall inform you without delay and within one month of receipt of the request, providing our reasons for not taking the action requested.

## Right to access personal information

Individuals have the right to confirm the following with us:

- Whether or not we process personal information about them
- Certain specified information about the processing

Individuals also have a right to access the personal information and be provided with a copy.

## Right to restrict processing of personal information

Individuals have the right to request that we restrict processing of their personal information where one of the following applies:

- An individual contests the accuracy of the personal information. The restriction will apply until we have taken steps to verify the accuracy of the personal information;
- The processing is unlawful but an individual does not want the personal information to be erased and requests restriction instead;
- We no longer require the personal information for the purposes of processing, but it is still required by an individual in connection with a legal claim;
- An individual has exercised their right to object to the processing. The restriction will apply until we have taken steps to verify whether we have compelling legitimate grounds to continue processing.

## Right to object to processing of personal information

Where personal information is used to target marketing to an individual, they have the right to object to this at any stage.

An individual also has the right to object to processing of their personal information where the legal basis of the processing is in our legitimate interests. We will have to stop processing until we are able to verify that we have compelling legitimate grounds for processing which override the individual's interests, rights and freedoms, or alternatively that we need to continue processing for the establishment, exercise or defence of legal claims.

## Right to rectification of personal information

If an individual believes that the personal information we hold on them is inaccurate, they may request that it be amended. They may also request that incomplete personal information be completed, including by providing a written confirmation.

## Right to request erasure of personal information ("right to be forgotten")

An individual may also request the erasure of their personal information in certain circumstances, including the following (this is not an exhaustive list):

- The personal information is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- The processing was based on consent which has been withdrawn and there is no other legal basis for processing;
- The individual has exercised their right to object to the processing and there are no overriding legitimate grounds for the processing to continue.

There are also certain exceptions where we may refuse a request for erasure, for example, where the personal information is required to comply with a legal obligation or for the establishment, exercise or defence of legal claims.

If an individual does request erasure of their personal information, this will potentially remove records which we hold for their benefit, such as their presence on a suppression list and they will have to contact us to provide personal information if they wish for us to hold this in future.

## Right to Data Portability

Where we are relying upon the legal basis either of consent or that the processing is necessary for the performance of a contract to which an individual is a party, and that personal information is processed by automatic means (e.g. electronically), an individual has the right to receive all the personal information which they have provided to us in a structured, commonly used and machine-readable format and to transmit this to another controller directly, where this is technically feasible.

## Supervisory Authority

An individual also has a right to lodge a complaint with a supervisory authority, in particular in the Member State in the European Union where they are habitually resident, where they work or where an alleged infringement of Data Protection laws has taken place.

## 4. Marketing Communications

If you are account holders and/or investors, business contacts or subscribers covered by this Notice, we will keep you up-to-date with details of our products and services by email using the information that you have supplied. We will first obtain your permission if we use your personal email addresses or anything required by applicable law. In any case, you can change your preferences by contacting us as described below.

Additionally, we will ensure that any outside companies assisting us in marketing our products and services, or with whom we have joint marketing agreements, are under contractual obligations to protect the confidentiality of your personal information, and to use it only to provide the services we have asked them to perform.

## 5. International transfers & data sharing

There may be occasions when the relevant Franklin Templeton group company who is the data controller as set out in Part B of this Notice will be a joint controller with another Franklin Templeton group company. Where the other Franklin Templeton group company is based outside the EEA, then the data controller responsible for responding to requests to exercise your rights will be the relevant company set out in Part B of this Notice. In all cases, any complaints and requests to exercise your rights should be addressed to the Data Protection Officer (refer to Part B of this Notice), who will arrange for the responsible joint controller to handle the complaint or request.

We may also transfer and maintain your personal information covered by this Notice on servers or databases outside the European Economic Area (EEA).

The countries to which we transfer data outside of the EEA include: Australia, Bahamas, Bermuda, Brazil, British Virgin Islands, Canada, Chile, China, Colombia, Cayman Islands, Hong Kong, India, Japan, Republic of Korea, Malaysia, Mauritius, Mexico, Singapore, South Africa, Switzerland, Turkey, United Arab Emirates, United States, and Uruguay.

Some of these countries may not have the equivalent level of data protection laws as those in your location. If we need to transfer personal data outside the EEA, we will take steps to make sure your personal information is protected and safeguarded once it leaves the EEA, in particular, we will use the EU Data Protection Model Clauses approved by the European Commission and permitted under Article 46 of the GDPR. If you would like to obtain the details of such safeguards, you can request these from the Data Protection Officer.

In addition to sharing the information with other group companies and third parties, we may disclose or transfer your personal information to a prospective or actual purchaser or transferee, in the event that a Franklin Templeton company or its assets is / are merged or sold or a sale or transfer is intended.

## 6. Retention Periods

We will retain your personal information covered by this Notice for as long as required to perform the purposes for which the data was collected, depending on the legal basis on which that data was obtained and/or whether additional legal/regulatory obligations mandate that we retain the personal information. In general terms, this will mean that personal information will be kept for the duration of our relationship and:

- the period required by tax, company and financial services laws and regulations; and
- as long as it is necessary for individuals to be able to bring a claim against us and for us to be able to defend ourselves against any legal claims. This will generally be the length of the relationship plus the length of any applicable statutory limitation period under applicable law.

It may differ from jurisdiction to jurisdiction however, in the majority of cases, this will be during our relationship and then for 10 years after the end of the relationship.

We retain your personal information if you have invested in Funds based in the United Kingdom for 6 years after the end of the relationship. We retain your personal information if you have invested in Funds based in the Republic of Ireland for 7 years after the end of the relationship.

In certain circumstances, data may need to be retained for a longer period of time, for example, where we are in ongoing correspondence or there is a continuing claim or investigation.

Our web logs are kept for 60 days to support investigation and reporting of any attempted security breaches on Our Websites.

## 7. Confidentiality and Security

We have implemented reasonable technical and organisational measures designed to secure personal information from accidental loss and unauthorised access, use, alteration or disclosure. Our employees are required to follow specific procedures with respect to maintaining the confidentiality of our investors' personal information. Additionally, we maintain physical, electronic, and procedural safeguards to protect the personal information that we process. This includes performing ongoing evaluations of our systems containing investor information and making changes when appropriate.

However, as regards information transmitted via the Internet, the Internet is an open system and we cannot and do not guarantee or warrant the security of any information that an individual transmits on or through Our Website or that we otherwise maintain, although Our Website uses the secure file transfer protocol where appropriate.

## 8. Data Subjects type details

### Account holder and investor personal information

Personal Information we collect about account holders and investors in Franklin Templeton Funds.

Account holders and investors include unitholders and shareholders of the Funds that we operate, administer, and to which we provide transfer agency, registration, other services, or which we distribute.

We collect certain personal information on various accounts but is not limited to the following holders and investors in our Funds, direct from the account holders and investors, through their referring professional adviser, intermediary or bank or other firm or, in the case of Know Your Client Information, from third party lists on Politically Exposed Persons, sanctions or other matters related to our compliance with regulation or risk analysis.

We may collect the information through applications or other forms, whether we receive the forms in writing or electronically.

This personal information includes but is not limited to the following:

- identification data and data we use to communicate with account holders and investors, such as their name, position, current and former addresses (private and professional), telephone number (private and professional), email address, age/date of birth, place of birth, nationality, sex, civil status and a photograph;
- identification numbers we receive from account holders and investors or third parties, such as tax, passport, national or other identification number;
- personal bank account and financial information such as account identification and number, income and (for professional investors) financial licence;
- information about the account holders' or investors' transactions (requested through Our Website or otherwise) and account history with us, or with other companies that are part of Franklin Templeton, including investment selection, account balances, shareholdings or unit holdings, redemption fees, and transaction instructions;
- account holders' and investors' communications or queries to us concerning their investments;

- recordings of telephone calls;
- information we collect for Know Your Client purposes. This may include information which we will process in order to determine an account holder's or investor's status as a Politically Exposed Person if we have their consent or are otherwise authorised to use this information under applicable law. This may also include information about criminal convictions if we are authorised to use this information under applicable law. In certain circumstances, we will also request information regarding the source of wealth relating to an investment with us;
- where we provide on-line account access (when requested by the account holder or investor or their financial adviser), log-in and similar credentials, and information about use of such access; and
- other general information that we may obtain about account holders and investors such as demographic information.

### How we use account holders' and investors' personal information

We use the personal information we collect about account holders and investors for the following purposes:

- verifying identity, checking transactions for anti-money laundering purposes, assisting in the prevention of fraud, terrorist financing, bribery and corruption, and assisting us to not provide services to persons who may be subject to economic or trade sanctions;
- managing their holdings in the relevant fund or any related account on an on-going basis (including responding to their requests and performing transactions for them), and also enabling their investment adviser, dealer and our Transfer Agency personnel to provide account management services (including the ability to view the investor's account);
- internal analysis and research to help us improve our services to account holders and investors and to better service their accounts;
- live testing of our systems on an exceptional basis, to resolve issues internally as soon as possible to enable us to deliver high standards of service;
- protecting our account holders' and investors' holdings and data; and
- providing account holders and investors with more choices or information about products and services which may be of interest to them, with the account holder's or investor's consent (see "Marketing Communications" above).

We justify our processing of account holders' and investors' personal information on the following legal bases:

- performing a legal obligation to which we are subject, which may include certain legal or regulatory disclosures and recording services we provide by telephone;
- performing our obligations under our contracts with account holders and investors;
- performing a task in the public interest, for example where we are carrying out our verification processes in relation to the prevention of fraud, money laundering, terrorist financing, bribery and corruption and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions;
- pursuing our legitimate interests and those of third parties. A legitimate interest will apply only where we consider that it is not overridden by an account holder's or investor's interests or rights which require protection of their personal information.

We have determined that our legitimate interests include the following:

- The improvement and management of our account holder and investor services;
- Our compliance with our regulatory requirements and improving the overall performance of the Funds;
- The conduct of internal audits for the legitimate purposes of managing our business;
- Live testing as described above in scenarios where live data is required, for the legitimate purposes of ensuring the resilience of our systems and continuing high standards of service;
- Tracking the effectiveness of mailing and targeting personalised marketing to account holders and investors for the legitimate purposes of promoting our business and our brand;

- Obtaining professional (including legal) advice and tracking and reporting on ongoing litigation involving account holders and investors to protect our business and our brand.

If an account holder or investor requires further information regarding our legitimate interests as applied to their personal information, they may contact the Data Protection Officer.

We also process personal information where an account holder or investor has provided consent, such as in the case of certain marketing communications, and the use of information in determining an individual's status as a Politically Exposed Person for Know Your Client purposes. In the event that an account holder or investor wishes to withdraw their consent they should contact the Data Protection Officer.

In certain circumstances, where an account holder or investor does not provide personal information which is required (for example, for us to carry out anti-money laundering checks), we will not be able to provide the products and services under our contract with them or may not be able to comply with a legal obligation on us. We will make it clear if and when this situation arises and what the consequences of not providing the information will be for the account holder or investor.

### Recipients of personal information about account holders and investors

We will disclose account holders' and investors' personal information as follows:

- to our affiliated Franklin Templeton group companies such as transfer agency services, investment advisers, distributors of our Funds in order to process the data for the above mentioned purposes;
- to third parties who have introduced account holders and investors to us, such as financial service providers offering banking, trust, and custodial products and services in order to process the data for the above mentioned purposes, including access through our portal;
- to third parties who work on our behalf or for the account holder or investor to service or maintain accounts, such as administrators, custodians, transfer agencies and investment managers including those external to the Franklin Templeton group of companies;
- to third parties who provide technical services to process transactions requested by investors or related to the administration of their investments, such as suppliers of banking applications and other IT systems, and print services, which we use to process that information;
- to third parties who operate systems relevant to performing transactions for account holders and investors, such as trade messaging systems;
- to third parties providing services to Franklin Templeton group companies, such as its professional advisers (e.g. auditors and lawyers);
- to a party representing an account holder or investor (for example, in response to legal process);
- to competent authorities such as tax authorities, courts, regulators and security or police authorities where required or requested by law or where we consider it necessary.

### External director information

We collect the following information from our external directors (which includes authorised signatories and other officers of our Funds):

- Identification data, such as name, address, phone number, email;
- Tax identification such as National Insurance Number;
- Passport information;
- Financial details such as fees paid and bank account details;
- Communications including emails, telephone calls and letters.

### How we use information we collect about our external directors

We use the personal information we collect about external directors for the purposes of:

- Managing and fulfilling our obligations under our contracts with external directors;
- Compliance with any contractual, legal or regulatory obligations, including our on-boarding processes;
- Management of our business and other legitimate business purposes and otherwise to enable the fulfilment of the duties of our external directors.

We justify our processing of external directors' personal information on the following legal bases:

- performing our obligations, or entering into, a contract with our external directors;
- performing a legal obligation to which we are subject, which may include certain legal or regulatory disclosures;
- performing a task in the public interest, for example where we are carrying out our verification processes in relation to the prevention of fraud, money laundering, terrorist financing, bribery and corruption and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions;
- pursuing our legitimate interests and those of third parties. A legitimate interest will apply only where we consider that it is not overridden by an external director's interests or rights which require protection of their personal information.

We have determined that our legitimate interests include the following:

- The improvement and management of our services;
- Our compliance with our regulatory requirements;
- Improving the overall performance of the Funds.

If an external director requires further information regarding our legitimate interests as applied to their personal information, they may contact the Data Protection Officer.

In certain circumstances, where an external director does not provide personal information which is required (for example, for us to carry out anti-money laundering checks), we will not be able to perform our obligations under the contract with them or may not be able to comply with a legal obligation. We will make it clear if and when this situation arises and what the consequences of not providing the information will be for the external director.

### Recipients of information about external directors

We will disclose personal information of external directors as follows:

- to our affiliated Franklin Templeton companies such as transfer agency services, investment advisers, distributors of our Funds in order to process the data for the above mentioned purposes;
- to third parties who provide services for the benefit of external directors on our behalf, such as payroll providers;
- custodians, brokers, dealing platforms, trade messaging systems, banking platforms, and external third parties providing administration, transfer or asset management services, and other third parties concerned with the services we provide to account holders, investors and institutional clients;
- to third parties who work on our behalf to service or maintain systems processing account information, such as suppliers of the IT systems which we use to process that information, or who provide other technical services, such as printing;
- to third parties providing services to Franklin Templeton, such as its professional advisers (e.g. auditors and lawyers);
- to competent authorities such as tax authorities, courts, regulators and security or police authorities where required or requested by law or where we consider it necessary.

### Business contact information

We collect personal information from our business contacts, such as representatives of banks or financial firms, professional advisers and suppliers, including the following:

- name, job title, profession, and contact details including email;
- where we provide online access to accounts, log-in and similar credentials, and information about our business contacts' use of those services;
- communications with our business contacts;
- financial licence, dealer number and dealer name.

### How we use business contact information

We use personal information from our business contacts for the following purposes:

- to communicate about the services we offer and provide to mutual clients or investors whom our business contacts refer to us;

- to enable business contacts to use our online services;
- to send marketing communications about our services and products we think may be of interest to our business contacts or our mutual clients or investors whom they refer to us;
- to invite our business contacts to events;
- for internal analysis and research to help us improve our services;
- to communicate about the goods and services we obtain from our suppliers.

We justify our processing on the following legal bases:

- performing our obligations under our contracts with other businesses;
- pursuing our legitimate interests and those of third parties. A legitimate interest will apply only where we consider that it is not overridden by a business contact's interests or rights which require protection of their personal information.

We have determined that our legitimate interests include the following:

- The improvement and management of our services;
- The promotion of our business and brand;
- The improvement of the overall performance of the Funds;
- Conducting internal audits for the legitimate purposes of managing our business;
- Tracking the effectiveness of mailing and targeting personalised marketing to business contacts for the legitimate purposes of promoting our business and our brand;
- Populating client relationship management systems to facilitate ongoing relationships and creating new opportunities for the business.

If a business contact requires further information regarding our legitimate interests as applied to their personal information, they may contact the Data Protection Officer.

In certain circumstances, where a business contact does not provide personal information which is required (for example, in relation to our online services), we will not be able to perform our obligations under the contract with them or may not be able to provide them with products and services. We will make it clear if and when this situation arises and what the consequences of not providing the information will be for the business contact.

We will obtain the consent of our business contacts to send them marketing communications, where this is required under applicable law. If a business contact wishes to withdraw their consent they should contact the Data Protection Officer.

### Recipients of Business Contact Data

We may disclose business contacts' personal information as follows:

- to our affiliated Franklin Templeton companies such as transfer agency services, investment advisers, distributors of our Funds in order to process the data for the above mentioned purposes;
- to custodians, brokers, dealing platforms, trade messaging systems, banking platforms, and external third parties providing administration, transfer or asset management services, and other third parties concerned with the services we provide to account holders, investors and institutional clients;
- to third parties who work on our behalf to service or maintain business contact databases, and systems processing account information, such as suppliers of the IT systems which we use to process that information, or who provide other technical services, such as printing;
- to third parties providing services to Franklin Templeton, such as its professional advisers (e.g. auditors and lawyers);
- to competent authorities such as tax authorities, courts, regulators and security or police authorities where required or requested by law or where we consider it necessary.

## 9. Web-related collection of personal information

### Information we collect about users of Our Website and social media sites

We collect personal information about users through Our Website, and Franklin Templeton web pages on social media sites such as Twitter and LinkedIn, including the following:

- Information users provide when they enter information on Our Website, such as when submitting a "Contact Us" message (such as name, email address, salutation);
- Information users provide when they subscribe to email newsletters, press releases or other periodicals through Our Website (such as name, email address, salutation, investor type and country of residence);
- Information users provide when posting content on social media sites;
- Information users provide in their social media bio;
- Information users provide when they respond to a survey or marketing communication, such as their opinions about our services and information about themselves (such as age range, services used, how they know us, their opinions of our services);
- Information users provide when they register for an online account through Our Website (such as name, email address, address, date of birth, unique identification numbers (e.g. client reference number, social security number). The decision to provide this information is optional. However, if the user decides not to provide such information, they may not be able to access certain content or features available on or through Our Website;
- Information captured in our web logs such as device information (e.g. device brand and model, screen dimensions), unique identification numbers (e.g. IP address and device ID), and browser information (e.g. URL, browser type, pages visited, date/time of access);
- Information captured by our cookies (see 'Cookies, Tags and Similar Technologies' section below);
- Advertising information (such as size/type of ad, ad impressions, location/format of ad, data about interactions with the ad);
- Behavioural information (such as information on the behaviour or presumed interests of individuals which are linked to those individuals and may be used to create a user profile); and
- Information users provide in connection with purchasing items from Our Website shops (such as name, payment card information, and billing and delivery address and purchase details).

**Our Websites and online services are for individuals who are at least 18 years of age. Our online services are not designed to be used by minors under the age of 18.**

In certain circumstances, where a website user does not provide personal information which is required (for example, in relation to our online services), we will not be able to perform our obligations under the contract with them or may not be able to provide them with products and services. We will make it clear if and when this situation arises and what the consequences of not providing the information will be for the website user.

### How we use website and social media users' information

We use the personal information we collect from Our Website users and individuals accessing Franklin Templeton web pages on social media sites for the purposes of:

- personalizing their experience of Our Website;
- monitoring social media content to manage relations with our customers and promote our business and brand;
- if there is an interaction on a social media site with a third party social media user that we consider that we should react on, passing a link to the content and third party's profile to the department of interest;
- providing products and services that website users have requested;
- administering the website, investigating any complaints and providing customer service;
- providing website users and individuals accessing our web pages on social media sites with information and offers on products or services that may be of interest to them (see section above on Marketing Communications); and

- performing statistical and trend analysis to improve the user experience and performance of Our Website.

Please see below as regards information we collect through cookies and other tracking technologies.

We justify our processing on the following legal bases:

- consent to receiving our marketing communications (see section on Marketing Communications), where applicable. In the event that an individual wishes to withdraw their consent they will have an option to “Unsubscribe” or may contact the Data Protection Officer.
- performing our obligations under our contracts with users buying goods and services from our Webshop or registering online to receive our services or using our online services (subject to our separate terms and conditions of supply);
- compliance with the law or regulatory requirements; and
- pursuing our legitimate interests. A legitimate interest will apply only where we consider that it is not overridden by a website or social media user’s interests or rights which require protection of their personal information.

We have determined that our legitimate interests include the following:

- Promoting our products, services and Funds through Our Website and other communications;
- Monitoring, investigating and reporting any attempts to breach the security of Our Websites;
- Improving the performance and user experience of Our Website;
- Performing our obligations under our contracts with our users;
- Managing our business and brand by monitoring our public profile and responding promptly to complaints;
- Improving the security, performance and user experience of Our Website;
- Targeting personalised marketing to website and social media users for the legitimate purposes of promoting our business and our brand.

If a website user or individual accessing our web pages on social media sites requires further information regarding our legitimate interests as applied to their personal information, they may contact the Data Protection Officer.

Survey Information: Occasionally we may ask users to participate in a brief survey to help us make smart choices as we look for ways to improve Our Website. Information users provide in response to such surveys will not be identified with them unless they consent.

## Recipients of website and social media user data

We may disclose personal information of website and social media users as follows:

- to our affiliated Franklin Templeton companies such as transfer agency services, investment advisers, distributors of our Funds in order to process the data for the above mentioned purposes; and
- to third parties who work on our behalf to service or maintain business contact databases, and systems processing account information, such as suppliers systems supporting Our Website.

## External Links

Our Website may contain links to online websites or content operated and maintained by third parties, over which we have no control. Please consult the privacy policies of these third-party sites to become familiar with their privacy practices and to learn about any choices that these companies may offer you with respect to your personal information.

## 10. Cookies, tags and similar technologies

A cookie is a small text file which includes a unique identifier that is sent by a web server to the browser on your computer, mobile phone or any other internet enabled device when you visit an on-line site. Cookies and similar technologies are widely used to make websites work efficiently and to collect information about your online preferences. For simplicity, we refer to all these technologies as “cookies”.

Some of Our Website pages may contain electronic images known as web beacons (also known as clear gifs, tags or pixels) that allow us to count users who have visited our pages. Web beacons collect only limited information, e.g. a cookie number, time and date of a page view, and a description of the page on which the web beacon resides. We may also carry web beacons placed by third party advertisers. These beacons do not carry any information that could directly identify you.

### How do we use cookies?

We use cookies and other tracking technologies to customise content and advertising, provide social media features and to see how our visitors move through Our Website. We use this information to make decisions about ways to improve the services we offer you.

We may engage third party tracking and advertising providers such as those named below to act on our behalf to track and analyse your usage of Our Website through the use of cookies. These third parties collect, and share with us, usage information about visits to Our Website and, sometimes by correlating this information with other information (e.g. your IP address), measure and research the effectiveness of our advertisements, track page usage, help us target our recommendations and advertising, and track use of our recommendations and advertisements.

## Cookies and types of cookies we use

The table below describes the cookies that we use.

Cookie name / provider / type	What these cookies do	Life of Cookies
Performance cookies, such as those used for Google Analytics	<p>These cookies collect information on how users use Our Websites, in order to help us fix technical issues or errors, and highlight areas such as navigation where we can improve Our Website. For example, Google Analytics uses cookie identifiers to track the number of visitors to the website, providing us with the volumes and sources of web page traffic. This allows us to analyse web traffic patterns and run tests to optimize web pages and visits against key metrics.</p> <p>The information collected by Google Analytics itself is anonymous but if you respond to a marketing email then a random Id is generated for Google Analytics which we can use along with your email address to manually identify you from other information we already hold in your customer profile. We may then use this information to generate potential sales leads for products we think you might be interested in.</p> <p>You can find more information about how Google Analytics safeguards your data at: <a href="http://www.google.com/intl/en/analytics/privacyoverview.html">http://www.google.com/intl/en/analytics/privacyoverview.html</a></p>	Up to 24 months
Targeting cookies, such as those provided by Marketo	<p>Marketo cookies track your IP address (which we anonymise) in order to infer your location, company (for financial advisers) and other details which can help us to build a user profile. This allows us to tailor the content presented to you on Our Website, or send you targeted communications through email or social media if you have provided us with an email address through Our Website with consent to receive updated product information.</p> <p>Franklin Templeton engage in multi-channel promotional activity (advertising, email marketing, social media targeted advertising). Marketo cookies measure the effectiveness of these campaigns by tracking responses and initiating appropriate automated reactions. For example, should you respond to an email campaign but do not complete the user journey then we may send you an additional automated communication to prompt a response from yourself.</p> <p>You can find more information about how Marketo safeguards your data at: <a href="https://www.marketo.com/company/trust/">https://www.marketo.com/company/trust/</a></p>	Up to 24 months
Other targeting cookies, such as those used by advertising platforms we may use like Revjet, Adwords, Bing Advertising, Doubleclick, Facebook, Twitter, LinkedIn, Outbrain, Demandbase, Pulsepoint and Dianomi	<p>In addition to Marketo, we may use other cookies to target and re-target visitors to Our Websites with digital advertising that is most relevant to the user. These cookies are also used to limit the number of times you see an advert or particular content, as well as help measure the effectiveness of an advertising or marketing campaign. Using existing cookies from many sites already on your computer, we partner with 3rd party companies to deliver advertising to specific computers. For more information about digital advertising visit AdChoices at: <a href="http://www.youradchoices.com">www.youradchoices.com</a>.</p>	Up to 24 months
Social media cookies	<p>We allow users to share Our Websites on social media such as Facebook and Twitter. These cookies are not within our control. Please refer to the respective privacy policies of the social media provider for how their cookies work.</p>	n/a
Functionality cookies, such as 'policy_*' and 'segment_*	<p>These cookies help us customise Our Website content based on a user's preferences. They remember the user's choices such as identifying the user as a particular investor type (Retail, Professional or Institutional), their language, the country pages visited and any changes the user makes to text size or other parts of Our Website pages. The information these cookies collect may be anonymised and they cannot track browsing activity on other websites.</p>	6 months
Essential cookies, such as 'JSESSIONID'	<p>These cookies are essential for parts of Our Website to operate. They enable users to move around Our Website and allow us to recognise a user within Our Website so that we can provide them with service they asked for such as remembering the user's sign-in details.</p>	Up to 12 months

## 10. Cookies, tags and similar technologies *(continued)*

If you have any specific queries regarding cookies which are deployed on Our Website, we maintain a Cookie Register which you can request from the Data Protection Officer.

You can find more information about cookies, behavioural advertising and online privacy at [www.allaboutcookies.org](http://www.allaboutcookies.org) or [www.youronlinechoices.eu](http://www.youronlinechoices.eu).

### How do I reject cookies?

If you do not want to be tracked by Google Analytics cookies you can opt-out by installing a browser plug-in here:

<https://tools.google.com/dlpage/gaoptout/>.

If you do not want to be tracked by Marketo cookies you can opt-out by clicking the link here:

[https://www.franklintempletonglobal.com/marketo-optout.page?marketo\\_opt\\_out=true](https://www.franklintempletonglobal.com/marketo-optout.page?marketo_opt_out=true)

If you do not want to receive any cookies from our emails then do not download any images or click any links when you open the email. You may first have to disable automatic downloading of images on your email client.

At any time, you can prevent cookies from being set on your browser. For instructions on how to block, delete or disable cookies, please consult your browser's 'Help' or 'Support' section. Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of Our Website. Please also note that you cannot disable web beacons (clear gifs, pixels, tags) but these typically work in conjunction with other cookies and so will become largely ineffective if you disable cookies in your browser settings.

Please consult the following links for information on cookie management and blocking according to your browser:

Explorer: <http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11>.

Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Chrome: <https://support.google.com/chrome/answer/95647?hl=en>

Safari: [https://support.apple.com/kb/PH19214?locale=en\\_GB](https://support.apple.com/kb/PH19214?locale=en_GB)

You can also find more information and manage cookie storage at <https://www.aboutcookies.org/> and [www.youronlinechoices.eu](http://www.youronlinechoices.eu)

## PART B: FRANKLIN TEMPLETON GROUP COMPANIES & FUNDS

Franklin Templeton and all its group companies listed below will have access to information on individuals covered by this Notice. However, only the appropriate data controllers will have access to relevant investor data.

### How to Contact Us

If an individual wishes to exercise their individual rights, or to raise any questions, concerns or complaints concerning this Notice or on our privacy practices, they can contact us at the relevant address for their country listed below. The individual should address the envelope as follows: "FAO Data Protection Officer".

Alternatively, our Data Protection Officer can be contacted directly at:

### Franklin Templeton International Services S.à r.l.

8A, rue Albert Borschette

L-1246 Luxembourg

Grand Duchy of Luxembourg

Email Address: [DataProtectionOfficer@franklintempleton.com](mailto:DataProtectionOfficer@franklintempleton.com)

### Franklin Templeton Group Companies

#### AUSTRIA:

Franklin Templeton Austria GmbH  
Universitätsring 10  
4th Floor, 1010 Vienna, Austria

#### BELGIUM:

Franklin Templeton International Services S.à r.l., Belgian Branch  
28 avenue Marnix  
1000 Brussels, Belgium

#### FRANCE:

Franklin Templeton France SA  
20 Rue de la Paix  
75002 Paris, France

#### GERMANY:

Franklin Templeton Investment Services GmbH  
Franklin Templeton Investment Management Limited, German Branch  
Mainzer Landstr. 16  
D-60325 Frankfurt am Main, Germany

#### NETHERLANDS:

Franklin Templeton Investment Management Limited  
World Trade Center Amsterdam  
H-toren, 16e verdieping  
Zuidplein 134  
1077 XV Amsterdam, Netherlands

#### HUNGARY:

Franklin Templeton Magyarország Kft.  
1051 Budapest  
Sas utca 10-12,  
Hungary

#### ITALY:

Franklin Templeton International Services S.à r.l., Italian Branch  
C.so Italia, n.1  
20122 Milano, Italy

#### LUXEMBOURG:

Franklin Templeton Management Luxembourg S.A.  
Franklin Templeton International Services S.à r.l.  
8A, rue Albert Borschette  
L-1246 Luxembourg  
Grand Duchy of Luxembourg

#### POLAND:

Templeton Asset Management (Poland)  
Towarzystwo Funduszy Inwestycyjnych S.A.  
Franklin Templeton Investments Poland Sp. z o.o.  
Rondo ONZ 1, 29th Floor  
00-124 Warsaw, Poland

#### ROMANIA:

Franklin Templeton Investment Management Ltd UK  
Premium Point  
78-80 Buzesti, 08th floor  
District 1, Bucharest, Romania

#### SLOVAKIA:

Franklin Templeton Slovakia, s.r.o.  
Regus Business Centre  
Karadzicova 8/A  
821 08 Bratislava, Slovakia

#### SPAIN:

Franklin Templeton Investment Management Limited  
Calle Jose Ortega y Gasset, 29-5a planta  
28006 Madrid, Spain

#### SWEDEN:

Franklin Templeton Investment Management Limited  
Blasieholmsgatan 5  
SE-111 48 Stockholm, Sweden

#### UNITED KINGDOM:

Franklin Templeton Investment Management Limited  
Franklin Templeton Global Investors Limited  
Franklin Templeton Fund Management Limited  
Cannon Place, 78 Cannon Street  
London EC4N 6HL, United Kingdom

**For the following Funds, please contact directly the DPO.**

**Luxembourg domiciled products:**

Franklin Templeton Investment Funds (FTIF)  
Franklin Templeton Series II Funds (FTSIIF)  
Franklin Templeton Sharia Funds (FTSF)  
Franklin Templeton Specialized Investment Funds (FTSIF)  
Franklin Templeton Opportunities Fund (FTOF)

**US domiciled products:**

Templeton Growth Fund (TGF) Inc - Fund  
Franklin Templeton Private Real Estate Fund, L.P (Series B/C)  
Franklin Templeton Private Real Estate Fund IIB, L.P. (TBC)  
Franklin Templeton Private Real Estate Fund IIIB, L.P.

**Cayman domiciled products:**

FTAIF-TSEMF V (Templeton Strategic Emerging Markets Fund V (private equity))

**Ireland domiciled products:**

Franklin Floating Rate Fund Plc (FFRF)  
Franklin Emerging Market Debt Opportunities Fund (FTEMDOF)  
Franklin LibertyShares ICAV (Irish ETF)

**Poland domiciled products:**

Franklin Templeton Fundusz Inwestycyjny Otwarty

**Romania domiciled Products:**

Fondul Proprietatea

**United Kingdom domiciled products:**

Franklin Templeton Funds (OEIC)  
Templeton Emerging Markets Investment Trust (TEMIT)