



## **Data Protection Notice (the “Notice”)**

### **Introduction**

Eaton Vance Management, Eaton Vance Management (International) Limited, and other subsidiaries of Eaton Vance Corp. (“**Eaton Vance**”, “**we**”, “**us**” and “**our**”) collect information from individuals in the course of our business. Eaton Vance is committed to respecting your privacy and the confidentiality of this information.

### **About this Notice**

For the purposes of data protection law, Eaton Vance is a data controller in respect of your personal data. We are responsible for ensuring that we use your personal data in compliance with data protection law. Personal data includes any information that relates to an identifiable natural person residing in the European Union, or as otherwise specified in regulations applicable in the jurisdictions in which Eaton Vance operates.

This Notice applies to European Union residents whose personal data Eaton Vance collects, including individuals we deal with, receive information from, or send information to. This Notice also sets out the basis on which any personal data that you provide to us, that we create, or that we obtain about you from other sources, will be processed. Please take the time to read and understand this Notice. If you do not accept the terms of this Notice, your use of our website may be restricted.

### **Personal data that we collect**

We will collect and process personal data provided on applications, in documents, and during transactions. We will also collect and process personal data about you that you provide by filling in forms or by communicating with us, whether face-to-face, by phone, e-mail or otherwise. This information may include, but is not limited to, your name and contact information. You may provide us with your personal data for the purposes of receiving information, product or services from Eaton Vance, or in connection with a job application or your employment with us. Eaton Vance may request personal data from you to facilitate the provision of a personalized service.

We may receive your personal data from Eaton Vance affiliates, service providers, agents, financial advisers, brokers, and/or business partners. If such personal data is disclosed to us by a third party, it is the responsibility of the disclosing party to ensure that the personal data is disclosed in accordance with applicable rules and regulations and the necessary consents. We will process personal data disclosed to us by a third party in accordance with this Notice and our internal policies.

Eaton Vance may also incidentally collect data that falls within the scope of this Notice. For example, if you are an existing US resident who is a shareholder in an Eaton Vance fund, Eaton

Vance collects your personal data. Eaton Vance may continue to do so if you relocate to a jurisdiction with different data protection laws, such as the European Union.

Eaton Vance does not knowingly solicit or receive information from individuals under the age of eighteen (18).

When you use Eaton Vance websites, we may collect certain information about you, including your IP address and any other personal data that you provide to us through forms or email. By using our website, you acknowledge that your personal data may be tracked and used for business purposes for which we have a legitimate interest basis. For more information on the business purposes for which we have determined we have a legitimate interest basis for collecting and processing personal data, please see the below section on “Uses of your personal data.”

### **Uses of your personal data**

Eaton Vance may collect, store and process your personal data for a number of purposes. We are entitled to collect, store and process your personal data in instances where we have determined that we have a legitimate interest basis to do so. A legitimate interest basis exists where we are collecting and processing personal data for a legitimate purpose, the processing of the personal data is necessary to achieve that purpose, and our interest in achieving this purpose is not overridden by individuals’ interests in privacy. We have determined that we have a legitimate interest basis collecting and processing personal data to achieve a number of purposes, including (but not limited), the following:

- To gather market intelligence and directly market you;
- To offer you investment services and/or products;
- To fulfill our contract with you;
- To provide you with information about the products and services we offer;
- To send you emails, mailings, and other information that you request;
- To service and maintain accounts and records of transactions;
- To archive communications between you and Eaton Vance;
- To customize and improve your experience while using our websites;
- To monitor, detect, and protect against cyber security threats to our systems, network infrastructure, computers, and websites; and
- To process applications, forms and other documentation.

Eaton Vance may also use your personal data for the purposes of complying with our legal and regulatory obligations and the administration of justice in the jurisdictions in which Eaton Vance

operates. We may also use your personal data to resolve disputes, to establish, exercise or defend our legal rights, or for the purpose of legal proceedings.

Eaton Vance may share your personal data with third-parties, including service providers and vendors such as the providers of our electronic storage. Such third-parties are subject to confidentiality requirements and will provide the service in accordance with this Notice. New third-party service providers and vendors are subject to a risk assessment to determine whether sufficient safeguards are in place with respect to any personal data that they may process on our behalf.

Eaton Vance may also disclose your personal data for due diligence purposes in connection with mergers, reorganizations, sales, dissolutions, or transfers of business in which we are involved.

At your request, Eaton Vance may share your personal data with your advisor, representative, agent, or other designated parties.

### **Transfers of personal data outside the European Economic Area**

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside of the EEA who works for Eaton Vance affiliates or for one of our suppliers.

Where we transfer your personal data outside the EEA, Eaton Vance will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA. This can be done in a number of ways, for instance:

- The country that we send the data to might be approved by the European Commission;
- The recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal data; or
- Where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme.

In other circumstances the law may permit us to otherwise transfer your personal data outside the EEA. In all cases, however, we will ensure that any transfer of your personal data is compliant with relevant jurisdictions’ data protection law.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA by contacting us in accordance with the “Contacting us” section below.

### **Retention of personal data**

How long we hold your personal data for will vary. The retention period will be determined by various criteria including:

- The purpose for which we are using it – we will need to keep the data for as long as is necessary for a legitimate business purpose; and

- Legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data.

Personal data will be destroyed or deleted in accordance with our internal retention policies.

## **Cookies**

Eaton Vance makes use of cookies to analyse how our visitors use our websites and to monitor website performance. This allows us to provide a high quality experience by customising our offering and quickly identifying and fixing any issues that arise. For example, we might use performance cookies to keep track of which pages are most popular, which method of linking between pages is most effective, and to determine why some pages are receiving error messages. We might also use these cookies to highlight articles or website services that we think will be of interest to you based on your usage of the website. The information collected by these cookies is anonymous and is not associated with your personal data by us.

For additional information on Eaton Vance's use of cookies, please see our Cookie Policy.

## **Registered Users**

Some content or pages of the Eaton Vance website are available only to registered users. If you are a user who has previously registered or been registered for access, Eaton Vance may already have some of your personal data, such as your name and email address. Eaton Vance will handle this information in accordance with this Notice.

If you register as a new user for access to restricted content and pages, you will receive an email with a link to review this Notice and the option to opt-out from all communications with Eaton Vance. Any personal data that you provide to Eaton Vance at the time of registration, such as your name and email address, will be handled in accordance with this Notice.

## **Your rights**

You have a number of legal rights in relation to the personal data that Eaton Vance holds about you. These rights include:

- The right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- The right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so;
- In some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us;
- The right to request that we rectify your personal data if it is inaccurate or incomplete;

- The right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it;
- The right to object to, and the right to request that we restrict, our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally entitled to continue processing your personal data and/or to refuse that request; and
- The right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out in the "Contacting us" section below.

You can find out more information about your rights by contacting the data protection regulator in your jurisdiction.

### **Contacting us**

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed above, please address questions, comments and requests to [dataprotection@eatonvance.com](mailto:dataprotection@eatonvance.com).

This Data Protection Policy was last updated on 12 June 2018.