

## DATA PROTECTION NOTICE TO INVESTORS

### DIMENSIONAL FUND ADVISORS LTD. DIMENSIONAL FUNDS PLC DIMENSIONAL FUNDS II PLC

#### 1. INTRODUCTION

1.1 For the purposes of data protection law, we act as independent data controllers with respect to certain Personal Data and may receive such information about you. This document is meant to provide you with the notice of our processing of such Personal Data as required by law.

#### 1.2 Definitions:

- **“Affiliate”** means an entity that controls, is controlled by, or is under common control with any Dimensional Entity, including Dimensional Fund Advisors LP, Dimensional Ireland Limited, DFA Australia Limited, Dimensional Fund Advisors Canada ULC, Dimensional Japan Ltd., Dimensional Fund Advisors Pte. Ltd., and DFA Securities LLC;
- **“Dimensional UK”** means Dimensional Fund Advisors Ltd., 20 Triton Street, Regent’s Place, London NW1 3BF, which is included on the UK Information Commissioner’s Office register as a data controller and also is authorised and regulated by the Financial Conduct Authority;
- **“Dimensional Entities”** means Dimensional UK, its Affiliates and the Funds;
- **“Personal Data”** means any information relating to an identified or identifiable person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, or an online identifier or by one or more factors (e.g., physical) specific to that person;
- **“Regulatory Body”** means any regulatory body by which we or the other Dimensional Entities are or become regulated; and
- **“We”, “us” or “our”** is a reference to Dimensional UK and/or, as the context requires, the funds it principally advises, Dimensional Funds plc and Dimensional Funds II plc (the **“Funds”**), each of which is also as a data controller.

#### 2. THE TYPES OF PERSONAL DATA WE COLLECT

We may collect and otherwise process the following Personal Data. The extent of such processing is generally determined by the scope of the relevant services or relationship with you, and if we are unable to process such Personal Data, we may not be able to maintain a relationship or provide services. The lists provided below are non-exhaustive and may not be applicable to you; the lists, however, represent the types of Personal Data we typically receive in the course of ordinary business.

- **Information provided to us by individuals directly:**
  - basic Personal Data (such as name; age; address; gender; nationality; citizenship; telephone number(s); email address; date of birth); and
  - financial or tax information, as requested in connection with our investment management operations (such as details about a financial adviser or other representative or investment professional; investment details; banking or other financial details; employment history; social and/or national insurance number; passport or driver’s license; tax identification number(s) and details of tax residency).
- **Information we otherwise collect or generate, or obtain from other sources:**

- information regarding transactions, including those made on a person’s behalf, such as amounts and dates of trades, the amount of assets in an account, or communications with us;
- business contact information, and a file with a person’s contact history to be used for enquiry purposes;
- upon your visiting our website, certain data with regard to your visit and activities on the website via “cookies”; and
- information we are legally obligated to generate or collect, such as information for compliance or record-keeping obligations.

### **3. HOW WE USE YOUR INFORMATION**

3.1 We may store and process Personal Data in the following ways and for the following purposes, where applicable:

- to assess your application for services or to invest in the Funds;
- to operate the Funds, including managing and administering your investment in a relevant Fund on an on-going basis;
- to manage and track investments, and to analyze and improve services;
- to provide services, such as pertinent communications, including account statements, or related information per our contractual obligations, or the results of our surveys in which you participate;
- to comply with and assess compliance with applicable laws, rules and regulations, and internal policies and procedures (including but not limited to tax or other business reporting purposes);
- to contact you for marketing purposes (see “Marketing” at paragraph 6 below); or
- for the administration and maintenance of databases storing Personal Data.

We will process Personal Data to the extent necessary for the purposes set out above to perform our contractual obligations to you (if there is a contract between us), or otherwise to comply with our legal obligations. We may also process Personal Data in furtherance of our legitimate business interests, such as for the management and administration of our business, for marketing purposes, or to maintain compliance with internal policies and procedures, to the extent that we consider such processing is not prejudicial to a person’s fundamental rights and freedoms. We can seek your specific consent to the processing of your Personal Data for other purposes.

As part of our business and ongoing monitoring, we may from time to time carry out automated decision-making in relation to investors, including, for example, profiling of shareholders or prospective investors in the context of anti-money laundering reviews, and this may result in a shareholder or prospective investor being identified to the Irish Revenue Commissioners and law enforcement or tax authorities, and a Fund terminating its relationship with the shareholder.

### **4. DISCLOSURE OF YOUR INFORMATION TO THIRD PARTIES**

4.1 We may disclose Personal Data to a member of the Dimensional Entities in the circumstances outlined below:

- as required in connection with the management and administration of our business, including the management of an investment;
- to facilitate the provision of services;
- to assess an application for services or to invest in the Funds;
- to assess compliance with applicable laws, rules and regulations as well as internal policies and procedures across the Dimensional Entities; and

- as required in connection with the administration and maintenance of the databases storing Personal Data.

4.2 We may share Personal Data outside of the Dimensional Entities for the following purposes:

- with third-party agents, service-providers and contractors that provide services to us or facilitate the services we provide, including the depository, administrator, stockbrokers, auditors, legal advisers and secretary as noted in a Fund’s Prospectus. These third parties will be subject to confidentiality restrictions and requirements to use the Personal Data shared for limited purposes, such as those described in paragraph 3;
- to the extent required by law (for example, if we are under a duty to disclose Personal Data to comply with any legal obligation, including, without limitation, to comply with tax reporting requirements) or as may be needed to establish, exercise or defend legal rights. This may include disclosure to Regulatory Bodies or tax authorities; and
- to the extent required to transact on your behalf, including portfolio management and other transactions for the Fund.

## 5. **TRANSFERS OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA OR THE UNITED KINGDOM**

5.1 We may transfer Personal Data to other offices of the Dimensional Entities or to the Dimensional Entities’ agents, service-providers and/or contractors outside the European Economic Area (“EEA”) and, in the case of Dimensional UK, outside the United Kingdom (“UK”). This can include transfers to the United States.

5.2 For any transfer of Personal Data outside the EEA or the UK (as applicable), we are committed to providing appropriate safeguards to protect such information. This may be done in a number of ways, for instance:

- the recipient might have signed “model contractual clauses” approved by the European Commission or the UK Government (as applicable), obliging the recipient to protect Personal Data;
- the country that we send the data to might be approved by the European Commission or the UK as offering an adequate level of protection for Personal Data; or
- there is another approved scheme in place for the transfer.

We may also make such a transfer outside the EEA, or UK, where we have your consent to do so or where another legal exception from the requirement to provide appropriate safeguards to protect such information applies. In all cases, we will endeavour that any transfer of your Personal Data is compliant with relevant data protection law.

5.3 You can obtain more details of the protection given to your Personal Data when it is transferred outside the EEA or UK (including a copy of any “model contractual clauses” which we have entered into with recipients of your Personal Data) by contacting us as described in paragraph 10 below.

## 6. **MARKETING**

We may use your Personal Data for marketing services of the Dimensional Entities that may interest you. We provide the option to unsubscribe or opt-out of further communication on each electronic marketing communication sent to you, which you can exercise by following the unsubscribe instructions provided in the communication. You can also opt-out of further communications by contacting us directly using the details provided in paragraph 10 below.

## **7. HOW WE SAFEGUARD YOUR INFORMATION**

- 7.1 We seek to implement controls to maintain the security of information and information systems and to protect client files with appropriate safeguards, according to the sensitivity of the information contained therein. Appropriate controls (such as restricted access) may also be placed on our computer systems. Physical access to areas where Personal Data is gathered, processed or stored is limited to authorized employees.
- 7.2 As a condition of employment, employees of all Dimensional Entities are required to follow all applicable laws and regulations, including in relation to data protection law. Unauthorized use or disclosure of confidential client information by an employee of a Dimensional Entity is prohibited and may result in disciplinary measures.

## **8. RETENTION OF PERSONAL DATA**

We will retain your Personal Data only for as long as is necessary to manage investments in the Funds, meet regulatory requirements and carry out the purposes set out above and/or to comply with any legal obligations (whichever is longer).

## **9. YOUR RIGHTS**

- 9.1 You have a number of legal rights in relation to the Personal Data that we hold 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 the processing of your Personal Data at any time;
  - 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 such data to a third party where this is technically feasible (otherwise known as data portability). 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;
  - in certain circumstances, such as when the processing is carried out on the basis of legitimate interests, the right to request that we restrict the processing of your Personal Data or to object to our processing of your Personal Data. Again, there may be circumstances where you object, or ask us to restrict processing, but we are legally entitled 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 we have infringed any of your rights.
- 9.2 You may exercise your rights by contacting us using the details listed in paragraph 10 below.
- 9.3 You may find out more information about your rights by contacting the relevant privacy regulator (see “Questions and Concerns” below).

## 10. QUESTIONS AND CONCERNS

10.1 If you have questions or concerns about our handling of your Personal Data, please contact us using the following contact information:

*Address:* 20 Triton Street  
Regent's Place  
London NW1 3BF  
United Kingdom  
Attention: Privacy Officer

*Phone Number:* +44 (0)20 3033 3300

*Email Address:* EMEADDataPrivacy@dimensional.com

10.2 We aim to address any privacy-related questions promptly. If you are unhappy with how we are handling your Personal Data, you may lodge a complaint with a privacy regulator, including the privacy regulator of your habitual residence, your place of work or the place where the alleged infringement of your rights has occurred. You may also complain to the privacy regulator in the relevant place of domicile of Dimensional UK or the Funds:

- For Dimensional UK: The UK Information Commissioner (<https://ico.org.uk/>)
- For the Funds: The Irish Data Protection Commissioner: (<https://www.dataprotection.ie>)