



**Privacy Notice for Investors and Investees
(EU)**

PRIVACY NOTICE

MetLife Investments strongly believes in protecting the confidentiality and security of your personal data. This document is referred to as our “Privacy Notice” and describes how we use the personal data that we collect and receive about you. Our Privacy Notice contains some terms which you may need help understanding. These terms are listed in the **Glossary** at the end of our Privacy Notice.

This Privacy Notice applies to directors, officers, beneficial owners, legal representative, employees and collaborators of current, prospective and former Investors and Investees (“you”, “your” or “data subject”).

We use: the term “**Investee**” to refer to businesses or organizations to which we make or arrange an investment or provide financing; and the term “**Investor**” to refer to business and organization which invest in our funds and/or financial products.

Who we are

The following companies are referred to as “**MetLife Investments**” in this Privacy Notice:

- MetLife Investment Management Europe Limited, 20 on Hatch, Lower Hatch Street, Dublin 2, Ireland.

MetLife Investments is the data controller of your personal data processing activities mentioned in this privacy notice.

What personal data we collect about you

The types of personal data we collect and process may include your:

- **General Identification and Contact information**, such as your name, contact details including address, email details, phone number(s), age, date of birth, nationality, gender and photograph
- **Financial data**, such as income, assets, bank details, tax residency and tax identification information
- **Government IDs** (e.g. passports and ID Cards) and **Proof of Address** (e.g. utility bills)
- **Employment & Occupational Data**, such as employer, job title and occupational history
- **Background Data**, such as information relating to Political exposed persons (PEP), sanctions lists, anti-money laundering or bad press checks and criminal data
- **Device and Online Data**, such as IP address, cookies, call recordings and website usage

- **Communication data**, such as complaints, interaction with customer service, correspondence and call recordings
- **Special categories of personal data**, such as data relating to political opinions that we may collect during the Know Your Customer process to identify you and perform anti-money laundering due diligence
- **Criminal data**, data related to criminal conviction and offences

How do we collect your personal data?

Most of the information we have about you comes either from you directly or from people at the company you work for, represent, or own. For example, we collect personal details when you complete our forms during the Know Your Customer process, when you share information on our website, or when you contact us. You might give us this information at different times and through different channels, like phone, email, or text.

We may collect or generate information about you when you navigate our website or interact with our information technology systems.

If you need further information about cookies and other tracking technologies that we use, you can also read our [Website Privacy Notice](#) and [Cookie Policy](#), a copy can be found on our website.

We may receive information about you from third parties who are authorised to sell or distribute our investment products and services, such as distributors and intermediaries. This can also include other MetLife Group companies that offer or distribute our products and services. We may also receive information about you from fund service providers such as transfer agents.

Finally, as part of our Know Your Customer process, and because we are a regulated investment company, we (or service providers acting on our behalf) carry out identity checks and screening. These checks help make sure our services are not being used for unlawful, fraudulent, or dishonest activities, and that we meet our legal and regulatory obligations. To complete these checks, we may need to collect personal information about you from authorised third parties, such as:

- Providers of business information
- Identity verification and screening services providers
- Credit, fraud prevention and detection agencies
- Authorities
- Financial services company, including other MetLife group entities
- People that collaborate for the company that you represent or own
- Other public sources, such as Sanction Lists

Why we need your personal data and the legal basis for our processing of personal data

When we collect and process personal data about you or people that represent and own the company that you work for, we do it for specific reasons, and we need a lawful ground. Below there is some examples of reasons we may have to process your personal data and the specific applicable lawful ground.

We may collect information about legal representatives to sign contracts with our Investors and Investees, in this case the lawful ground to process this personal data will be that they are necessary for us to enter a contract with our clients.

We may need to process your personal data to comply with legal and regulatory requirements applicable to MetLife Investments. This can include carrying out anti-money laundering and sanctions screening checks, handling complaints, supporting investigations or litigation, complying with tax laws, or meeting other investment related regulatory requirements. In this case our lawful ground to process your personal data will be to comply with a legal obligation.

Please note that if we ask you to provide us with your personal data to enable us to comply with our legal or contractual obligations, or to enter into a contract with you and you fail to do so, we may not be able to enter into a contract with you and provide you with our services.

We may also rely on our legitimate interests, or those of a third party, as a lawful ground to process your personal data, unless those interests are overridden by your own interests, rights, or freedoms. For example, we rely on legitimate interests when we process personal data to prevent and detect fraud and for matters related to legal proceedings.

Additionally, MetLife Investments may collect and use your personal data to provide you with information about products, special offers, and services that may be of interest to you (for more information, please refer to the section on Direct Marketing). In such cases, we may rely on our legitimate interest or request your consent as the lawful basis for processing your personal data. Please note that when we ask for your consent, you have always the right to withdraw this consent at any time.

The table below provides further information on types of personal data we process, the reason why we need to process your personal data (“**Purpose**”), and the applicable legal ground (“**Legal basis**”).

Purpose	Type of personal data	Legal basis
To identify and onboard prospective clients	General Identification and Contact Information	Legitimate interest in reaching out to prospective clients to gauge their interest on working with MetLife Investments

Ensure that clients are happy with their relationship with MetLife Investments, and act on their complaints / concerns	General Identification and Contact Information Communication data	To comply with our legal obligations Legitimate interest in maintaining relationship with existing clients
Monitor adherence to applicable regulations and to internal MetLife Investments policies.	General Identification and Contact Information Financial data Employment & Occupational Data	To comply with our legal obligations
To comply with anti-money laundering & counter terrorist financing programs.	All the categories of data specified above including Special Categories where relevant (Section: What personal data we collect about you)	To comply with our legal obligations For special categories of personal data: necessary for reasons of substantial public interest under Article 9(2)(g) For Criminal Data: IRL Data Protection Act 2018 – Section 55
Ensure that the promotional content is suitable to be published and shared with clients / prospective clients	General Identification and Contact Information Employment & Occupational Data Financial data	To comply with our legal obligations Legitimate interest in reviewing promotional material prior to publishing or sharing to ensure it is accurate and appropriate.
Execute sales of financial products on behalf of our clients	General Identification and Contact Information	Performance of our contract with you
Update clients on their investments	General Identification and Contact Information	Performance of our contract with you
Produce Transaction Report form to be sent to the Regulator	General Identification and Contact Information	To comply with our legal obligations
Manage Legal claims and Outside Counsel.	General Identification and Contact Information Communication data Criminal data	Legitimate interest in processing this personal data to allow MetLife Investments to manage legal claims and relationship with external counsels For Criminal Data: IRL Data Protection Act 2018 – Section 55
To provide you with marketing and promotional information, or to contact you to offer our products	General Identification and Contact Information	Legitimate interest in promoting our services); or Your Consent
To enable visitors to access the website securely and to monitor, maintain and improve website performance or tracking user activity	Device and Online Data	Legitimate interests to operate and protect our website; or Your consent
For internal business purposes which may include business and disaster recovery, document retention/storage, IT service continuity (e.g. back-ups and helpdesk assistance) to ensure the quality of our products and services we provide to you	All the categories of data specified above (Section: What personal data we collect about you)	Performance of our contract with you To comply with our legal obligations Legitimate interest in providing our services or products and protect our information systems

If you provide any of the above personal data about another person (e.g. legal representatives and beneficial owners of your company), or we ask you to review, confirm or update information relating to another person, it is your responsibility to ensure that they have had an opportunity to read this Privacy Notice. By providing their personal data, you acknowledge and confirm that they are aware of and have agreed to submitting their information.

To whom we disclose your personal data and why?

We may use and share your personal data with other companies in the MetLife Group to:

- receive services or outsource certain activities to our affiliates (e.g. IT services)
- help us prevent fraud, money laundering, terrorism and other crimes by verifying what we know about you
- provide you with information about MetLife, our products, special offers and services that may be of interest
- distribute and sell investment products
- fulfil other business purposes such as product development and website administration
- help us to manage our relationship with you
- perform research for us
- audit our business

We may also share your personal data with third parties who help us provide our investment products and services to you, or when it is necessary to comply with our obligations. For example, we may share your personal data:

- with regulatory bodies in order to comply with the law or rules that may apply to MetLife Investments
- with credit reference agencies, police, consumer reporting and fraud prevention agencies to check your identity, credit history and whether you have any criminal record, during the onboarding or when you execute a transaction with us
- with other financial services providers and claims investigation to prevent frauds and comply with our regulatory obligations (e.g. AML)
- with government agency or courts to comply with a search warrant or court order, or in case of investigations and law enforcement requests
- with third parties that administer our funds
- with service providers (e.g. IT services) and law or consultancy firms that provide services to us
- with companies that print and distribute mailings or companies that help us to perform marketing activities

When we share your personal data with third parties who perform business services for us, we require them to take appropriate steps to protect your personal data and only use the personal data for the purpose of performing those services.

Other reasons we may share what we know about you include:

- enforcing our agreement with you

- protecting the rights, property, or safety of MetLife Investments, our customers, or others
- doing what a court, regulator or government agency requires us to do, for example, complying with a search warrant or court order or acting as required or permitted by applicable law or regulation

Where we transfer your information?

We may transfer your personal data to other countries. The countries in the European Economic Area are considered to provide the same level of protection to personal data as the Republic of Ireland does. Where we transfer personal data or share it with others outside the European Economic Area, we ensure that we, and those persons or companies who we transfer it, agree to protect it from improper use or disclosure, in accordance with data protection law by Model Clauses or other appropriate mechanisms such as an Adequacy decision handed down by the European Commission

Companies outside the European Economic Area with whom we may share your personal data include our other group companies and service providers located in the United Kingdom. When your data is transferred to the United Kingdom we rely on Adequacy decision issued by the European Commission.

Furthermore, we may share your personal data with MetLife Group companies, IT providers and other suppliers located in the United States. When your personal data is transferred to the United States we may rely either on Adequacy decision - in case third parties adhere to the Data Privacy Framework (DPF) - or in other appropriate safeguard required under Applicable Data Protection Law, such as Standard Contractual Clauses.

Your data will be also transferred via remote access within the MetLife Group to India for the purposes of providing intragroup services. When your personal data is transferred to India, we will rely on appropriate safeguard required under Applicable Data Protection Law, such as Standard Contractual Clauses.

Please contact us if you would like further details about our data transfers or the standard data protection clauses we have put in place.

How we protect your personal data

The security and confidentiality of your personal data is extremely important to us. We have technical, administrative, and physical security measures in place to:

- protect your personal data from unauthorised access and improper use;
- secure our IT systems and safeguard information; and

- ensure we can restore your information in situations where the information is corrupted or lost in a disaster recovery situation.

Where appropriate, we use encryption or other security measures which we deem appropriate to protect your personal data. We also review our security procedures periodically to consider appropriate new technology and updated methods.

Direct marketing

We may offer you the opportunity to receive marketing from us in relation to products, special offers or services that we believe may be of interest to you. We normally send direct marketing by email if we have your email address, but may choose to contact you via other methods, if you have provided your consent for us to market to you using these methods. If you would like us to stop marketing to you, we offer simple ways to do this. Whenever you receive direct marketing you are told how you can unsubscribe. You can also select the 'unsubscribe' option on any email marketing communications we send to you.

How long will we keep your information?

We will typically need to retain your information throughout the duration of our relationship with you, and potentially beyond that point to comply with all applicable laws and privacy legislation to which we are subject, and to protect our legal rights in the event of a claim being made. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the purposes for which we process it and whether we can achieve those purposes through other means. Further details can be provided upon written request.

We safely and securely destroy data which we no longer need to keep in accordance with our data retention policies.

We will also consider if and how we can minimise over time the personal data that we use, and when we continue to use data for statistical or research purposes, we will ensure that the data is anonymised so that you cannot be identified by or from it in any way.

Automated decision making

We do not currently use any processing systems which make decisions and produce legal effects for you, or which may otherwise significantly affect you, based solely on automated processing of your personal data.

How will you know if we amend this Privacy Notice?

We may amend this Privacy Notice from time to time. Any changes we make to this Privacy Notice in the future will be posted to our website

(<https://investments.metlife.com/europe/regulatory-disclosures/>). This Privacy Notice was last updated on 14/05/2026.

Your Privacy Rights

This section explains your rights in relation to your personal data. The various rights are not absolute and are subject to certain exceptions or qualifications.

In order to exercise any of the rights described you can contact us using the details in the section “**How to contact us**”.

Rights	What does it mean?
1. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about your rights and how we use your personal data. This is why we are providing you with details about your information in this Privacy Notice
2. The right of access	You have the right to obtain access to your personal data and obtain a copy (if we are processing it), and other certain information (similar to that provided in this Privacy Notice). This is so you are aware and can check that we’re using your personal data in accordance with data protection law.
3. The right to rectification	You are entitled to have your personal data corrected if it’s inaccurate or incomplete.
4. The right to erasure	This is also known as ‘the right to be forgotten’ and enables you to request the deletion or removal of your personal data where there’s no compelling reason for us to keep using it. This is not an absolute right to erasure. We may have a right or obligation to retain the information, such as where we are under a legal obligation to do so or have another valid legal reason to retain it.
5. The right to restrict processing	In certain situations you have the right to ‘block’ or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their personal data to be ‘blocked’ to make sure the restriction is

	respected in future. This may affect our ability to provide services to you.
6. The right to data portability	You have rights to obtain a copy of some of the personal data that we hold on you and reuse or share it for your own purposes.
7. The right to object	You have the right to object to certain types of processing, including processing for direct marketing
8. Withdraw consent	When processing of your personal data is based on consent, you can withdraw your consent at any time

You also have the right to lodge a complaint with a supervisory authority in the European Economic Area in the place where you live or work, or in the place where you think an issue in relation to your personal data has arisen. A list of national supervisory authorities in the EEA can be found on the [European Data Protection Board website](#).

How to Contact us

To contact us about this privacy statement or any data protection issue or to exercise your rights, please use:

- MetLifeInvestmentsEUPrivacyChampion@metlife.com

Glossary

Data Controller is the person or organisation which decides the purposes and means of the processing of personal data either on its own or with others.

Credit Reference Agencies are companies which collect personal data relating to the credit ratings of individuals and make it available to organisations such as insurers and banks.

Fraud Prevention Agencies collect, maintain and share, personal data internationally on known and suspected fraudulent activity.

Model clauses are standard contractual clauses which have been approved by the European Commission as providing adequate safeguards to enable personal data to be transferred outside the European Economic Area.

Personal data is any personal information relating to an individual who can be identified, directly or indirectly, by reference to that information.

Processing means any operation or set of operations which is performed on personal data such as collection, recording, organisation, structuring, storage, alteration, retrieval, consultation, use, disclosure, erasure or destruction.

Special categories of personal data are types of personal data which might show a person's race, ethnicity, political opinions, religious or philosophical beliefs, trade union membership, sex life or sexual orientation, details about their health and any genetic or biometric data.

Beneficial owners A beneficial owner is the natural person who ultimately owns 25% or more of an entity, or otherwise exercises control through other means, and if no such person exists, the senior managing official is considered the beneficial owner.

Adequacy Decision is a decision by the European Commission confirming that a country outside the EEA provides an adequate level of data protection for personal data transfers.