

ETC Privacy Notice

This privacy notice explains the manner in which Amundi Physical Metals plc (the “**Issuer**”) collects, processes and maintains personal data about you pursuant to the Data Protection Law (as defined below).

You should review this notice carefully as it contains information about the treatment of your personal data and your rights under Data Protection Law.

Interpretation

For the purposes of this privacy notice: (i) “**Data Protection Law**” means the General Data Protection Regulation (EU) 2016/679 and the Irish Data Protection Acts 1988 to 2018, as amended from time to time (ii) “**controller**”, “**processor**”, “**data subject**”, “**personal data**”, and “**processing**” shall have the meanings given to them under the Data Protection Law, “**we**”, “**us**” or “**our**” means the Issuer in its capacity as controller of the personal data, and “**you**” or “**your**” means the Securityholder under the Secured Precious Metal Linked ETC Securities Programme (the “**Programme**”) (the “**investor**”) and includes any person owning or controlling the investor, having a beneficial interest in the investor, or for whom the investor is acting as agent or nominee. For the avoidance of doubt, “**Processor**” (as defined below) shall include HSBC Securities Services (Ireland) DAC (and its affiliates) acting as Administrator in relation to the Programme and HSBC Continental Europe acting as Issuing and Paying Agent in relation to the Programme, each in their capacity as processor of the personal data.

Sources of personal data

Personal data includes identifiers such as: name, date of birth, gender, address, email address, nationality, tax identification number (“**TIN**”), financial and investment qualification, shareholder reference number, national identification number, telephone/mobile number, fax number, bank details, and power of attorney details.

The Issuer collects personal data about investors mainly through the following sources:

- (a) subscription forms, investor questionnaires and other information provided by the investor in writing (including any anti-money laundering, identification, and verification documentation), in person, by telephone (which may be recorded), electronically or by any other means;
- (b) from third party vendors, transfer agencies, financial intermediaries and/or financial administrators;
- (c) transactions within the Programme, including account balances, investments, distributions, payments and withdrawals; and
- (d) we may also collect personal data relating to you from credit reference agencies and available public databases or data sources, such as news outlets, websites and other media sources and international sanctions lists.

Purposes

The storage, processing and use of personal data will take place for the following purposes:

- (a) Where the processing is necessary for compliance with a legal obligation to which the Issuer is subject to comply with in-house procedures and statutory/regulatory requirements applicable to the Issuer (including (where applicable) under FATCA, CRS, AML legislation and customer due diligence verification purposes).

- (b) Where the processing is necessary for the Issuer to perform a contract to which you are a party or for taking pre-contract steps at your request:
 - (i) to manage or administer your investment and any related accounts on an ongoing basis;
 - (ii) to administer and operate the Programme and/or the Issuer;
 - (iii) risk management and risk controlling purposes relating to the Issuer or any entity in the same group as the Issuer.
- (c) Where the processing is necessary in order to pursue the Issuer's legitimate interests:
 - (i) to carry out statistical analysis or market research;
 - (ii) for direct marketing purposes;
 - (iii) to help detect, prevent, investigate, and prosecute fraud and/or other criminal activity, and share this data with our legal, compliance, risk and managerial staff to assess suspicious activities;
 - (iv) to investigate and respond to any complaints about us and to help maintain service quality and train staff to deal with complaints and disputes.
- (d) Where you consent to the processing of personal data for any other specific purpose to which you have given specific consent.

As a controller, we will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Automated decision-making

We do not envisage that any decisions producing legal or other significant effects will be taken about you using fully automated means, however we will notify you in writing if this position changes.

Disclosure of personal data

Any disclosure of personal data shall be in accordance with the obligations of the disclosing party under the Data Protection Law. Further:

- (a) where you have notified us of your adviser, the personal information provided may be shared with such adviser. You must notify us in writing if you no longer wish us to share your personal information with your adviser or of any change to your adviser. Your adviser should have its own arrangements with you about its use of your personal information;
- (b) we may share your personal information with any third party to whom the Issuer may delegate certain functions in relation to the Issuer which may include Amundi Asset Management S.A.S (and its affiliates) in its capacity as Arranger and Advisor under the Programme, HSBC Corporate Trustee Company (UK) Limited in its capacity as Trustee and Security Trustee under the Programme, HSBC Bank plc in its capacity as Custodian under the Programme and/or other service providers (“**Processors**”) for the purposes set out in this Privacy Notice. Some of these third parties are located outside the European Economic Area (the “**EEA**”); and
- (c) in the course of the processing of personal data such personal data may be transferred

to Processors situated or operating in countries and territories outside of the EEA and the UK and such countries and territories may not have data protection laws equivalent to those in the EEA and the UK. When we transfer personal data to entities outside of the EEA or the UK, we will do so on the basis of (a) an adequacy decision from the European Commission; or (b) on the basis of European Commission-approved standard contractual clauses which will ensure that any such entity is contractually bound to provide an essentially equivalent level of protection in respect of the personal data transferred to it. For more information about these transfer mechanisms and to obtain a copy of any relevant contract concerning the transfer of your personal data, please contact us using the details provided below.

Investor rights

You have the right to:

- (a) receive information about how we process your personal data and to access your personal data;
- (b) rectify your personal data where it is inaccurate or incomplete;
- (c) restrict under certain circumstances the further processing of your personal data;
- (d) ask for erasure of your personal data under certain circumstances;
- (e) object to the use of your personal data (including for direct marketing purposes);
- (f) ask for personal data portability under certain circumstances.

Further, you may at your discretion refuse to communicate personal data to the Issuer or object to some processing of your personal data. There are situations where the Issuer may not be able to comply with such a request, for example, where it is subject to a legal obligation to retain or process the data, or where the data is required to perform the investment services. If you refuse to provide certain information to the Issuer (e.g. contact information), then the Issuer may not be able to provide investment services to you.

Where the processing is based on your consent, you may withdraw your consent at any time. However, the withdrawal of consent shall not affect the lawfulness of processing based on such consent before the consent is withdrawn, nor will it affect the lawfulness of processing based on other grounds.

You also have the right to lodge a complaint with a supervisory authority under the GDPR. For further information, see the “Complaints” section below.

Exercise of rights

You may exercise your rights by writing at the following e-mail address: dpo@amundi.com or by letter to the following address: Amundi Asset Management – BSC / SEC / PCA – 90, boulevard Pasteur – 75730 PARIS Cedex 15.

Complaints

Should you have any unresolved complaints in relation to the retention or processing of personal data, you may lodge a complaint with the Irish Data Protection Commission at www.dataprotection.ie. Alternatively, you may submit a complaint to your local supervisory authority, the details of which are available at https://edpb.europa.eu/about-edpb/about-edpb/members_en.

Retention of Personal Data

We keep your personal data only as long as necessary to fulfil: (a) the specific purpose for which the

data is processed; (b) the Issuer's legitimate business and operational needs; and (c) in order to comply with the legal obligations to which the Issuer is subject. The retention period is determined on a case-by-case basis and depends on several factors, including:

1. The nature of the information and why it is collected and processed (e.g. we process investor personal data in order to administer the Programme).
2. Whether the information is required for legal reasons (e.g. compliance with KYC obligations, in addition to obligations under FATCA and CRS).
3. Our operational retention needs (e.g. fraud detection and prevention; training staff to deal with complaints and disputes; maintaining financial records).

Generally speaking, the Company retains personal data for at least the duration of the relevant statute of limitations, in order to ensure that it is able to establish and defend legal claims relating to the Programme.

For further information on the Company's retention practices, please contact us at

Changes to Privacy Notice

The Issuer reserves the right to update this Privacy Notice at any time, and will ensure that any update to this privacy notice is made available on its website [www.amundi.cfm]. We encourage you to regularly review this and any updated Privacy Notice to ensure that you are always aware of how personal data is collected, used, stored and disclosed. We may also notify you in other ways from time to time about the processing of your personal data.