

DATA PROTECTION NOTICE TO INVESTORS

DIMENSIONAL FUND ADVISORS LTD. AS AUTHORISED CORPORATE DIRECTOR OF DIMENSIONAL FUNDS ICVC

1. INTRODUCTION

1.1 For the purposes of data protection law, we act as an independent data controller 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 or is under common control with any Dimensional Entity;
- “**DFAL**” means Dimensional Fund Advisors Ltd., as authorised corporate director of the Fund, having its registered office address at 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 DFAL, its Affiliates and the Fund;
- “**Fund**” means Dimensional Funds ICVC, an investment company with variable capital incorporated with limited liability and registered in England and Wales with product reference number 228136;
- “**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 Dimensional Entities are or become regulated;
- “**Sub-fund**” means a sub-fund of the Fund;
- “**We**” or “**us**” is a reference to DFAL as a data controller; and
- “**You**” is a reference to you, as an investor in one or more Sub-funds.

2. THE TYPES OF PERSONAL DATA WE COLLECT

2.1 Due to our relationship and/or the services we provide to you, we must obtain certain Personal Data about you. This Personal Data is information which we require in order to allow us to perform our contract with you (if there is a contract between us), or which we may otherwise be required by law to collect.

2.2 We may collect and otherwise process the following Personal Data about you. The extent of such processing is generally determined by the scope of the relevant services or relationship, and if we are unable to process such personal data, we may not be able to maintain a relationship with or provide services to you. The lists provided below are non-exhaustive or 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 that you provide to us:**
 - basic Personal Data (such as name; age; address; gender; nationality; citizenship; address; telephone numbers; email address; date of birth); and

- financial or tax information, as requested in connection with our investment management operations (such as advisor details; investment details; banking or other financial details; employment history; social and/or national insurance number; tax identification number(s) and details of tax residency).

- **Information we collect or generate about you, or obtain from other sources:**

- information regarding your transactions or transactions on your behalf, such as amounts and dates of trades, or the amount of assets in your account, and communications with us;
- a file with your 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 your Personal Data in the following ways and for the following purposes, where applicable:

- to assess your application for services or to invest in a Sub-fund;
- to manage and track your investment, and to analyse and improve services;
- to provide services to you, such as pertinent communications, including account statements, 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); or
- for the administration and maintenance of databases storing Personal Data.

We will process your Personal Data to the extent necessary for the purposes set out above in order 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 your Personal Data in furtherance of our legitimate business interests, such as for the management and administration of our business or to maintain compliance with internal policies and procedures, to the extent that we consider such processing is not prejudicial to your fundamental rights and freedoms. We can seek your specific consent to the processing of your Personal Data for other purposes, including in order to provide you with general information about DFAL and/or the Dimensional Entities’ services.

Where processing is based on your consent, you have the right to withdraw that consent at any time, and you also have the right to object to the processing of your Personal Data which is carried out in furtherance of our legitimate interests.

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

4.1 We may disclose your 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 your investment (or the investment of your client);
- to facilitate the provision of services to you;
- to assess your application for services or to invest in a Sub-fund;

- 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 your 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 to you, including the depository, registrar, administrator, auditor and legal advisers as noted in the prospectus of the Fund. These third parties will be subject to confidentiality restrictions and requirements to use your Personal Data 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 your Personal Data in order to comply with any legal obligation, including, without limitation, in order 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.

5. **TRANSFERS OF PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA**

5.1 We may transfer your 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”), including to offices located in the United States.

5.2 For any transfer of your Personal Data outside the EEA, we are committed to providing appropriate safeguards. This may be done in a number of ways, for instance:

- the recipient might have signed “model contractual clauses” approved by the European Commission, obliging the recipient to protect your Personal Data;
- the country that we send the data to might be approved by the European Commission as offering an adequate level of protection for Personal Data; or
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme (or such equivalent scheme as approved by appropriate Regulatory Bodies from time to time).

We may also make such a transfer outside the EEA where we have your consent to do so. If we rely on your consent to transfer Personal Data outside the EEA, you have the right to withdraw such consent at any time.

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

6. **MARKETING**

- 6.1 We may use your Personal Data for marketing DFAL and/or the Dimensional Entities services that may be of interest to you. Where we do this, we will act in accordance with the provisions of this privacy policy and notice.
- 6.2 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 email you receive. You can also opt-out of further communications by contacting us directly using the contact details provided in paragraph 10 below.

7. **HOW WE SAFEGUARD YOUR INFORMATION**

- 7.1 We seek to implement controls to maintain the security of our 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 authorised 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. Unauthorised 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 your investment, 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;
 - 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 or required to retain it;
 - the right to request that we restrict the processing of your Personal Data in certain circumstances. Again, there may be circumstances where you ask us to restrict its processing of your Personal Data but we are legally entitled or required 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: Data Protection Notice

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 your Personal Data is being handled, 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 UK Information Commissioner, the contact details of which are available on their website: <https://ico.org.uk/>.