

Mitteilung an alle Anteilseigner der VAM Fonds:

Anbei finden Sie die Information der Fondsgesellschaft, folgende Fonds sind betroffen:

LU0840938822	VAM Managed (LUX) Balanced - A CAP
LU1235259907	VAM Managed (LUX) Cautions - A CAP
LU1291166335	VAM Managed (LUX) Cautions - A CAP
LU0840939630	VAM Managed (LUX) Balanced - A CAP
LU1235259220	VAM Managed (LUX) Growth - A CAP
LU0840938665	VAM Managed (LUX) Balanced - A CAP
LU0297699406	VAM Managed (LUX) - A USD CAP
LU0404611757	VAM Managed (LUX) - A GBP CAP
LU1235260236	VAM Managed (LUX) Cautions - A CAP
LU0372758598	VAM (Lux) Global Infrastructure - A CAP
LU1235258842	VAM Managed (LUX) Growth - A CAP
LU0372757517	VAM (Lux) World Growth - B CAP
LU2346233203	VAM (Lux) Global Infrastructure - E CAP
LU0214332925	VAM Lux US Mid Cap Growth - A CAP
LU0247234700	VAM (Lux) US Micro Cap Growth - B CAP
LU0247231789	VAM (Lux) US Small Cap Growth - A CAP
LU0247234379	VAM (Lux) US Micro Cap Growth - A CAP
LU0247236747	VAM (Lux) US Large Cap Growth - A CAP

Details können Sie der beigefügten Anlage entnehmen. Falls Ihre Kunden diesen Änderungen nicht zustimmen und die Möglichkeit besteht, die Anteile ohne Gebühren seitens der Fondsgesellschaft zurückzugeben, können Sie den Verkauf der Anteile direkt in MoventumOffice erfassen.

Bitte nehmen Sie zur Kenntnis, dass für die Abwicklung dieser Aufträge die im Preis- und Leistungsverzeichnis von Moventum ausgewiesenen Gebühren und die auf MoventumOffice angegebenen Annahmeschlusszeiten gelten.

VAM MANAGED FUNDS (LUX)
Société d'investissement à capital variable
Registered office: 8-10, rue Genistre
L - 1623 Luxembourg, Grand Duchy of Luxembourg
R.C.S. Luxembourg B 129.579

NOTICE TO SHAREHOLDERS

Luxembourg, 10 February 2022

Dear Shareholder,

We, VAM Managed Funds (Lux) (the **Fund**), wish to inform you, as investor (the **Investor**) about certain outsourcing arrangements to be implemented by our central administration which renders amongst other services transfer agency services, RBC Investor Services Bank S.A. (**RBC**), whereby RBC may be required to disclose and transfer personal and confidential data about you and, as the case maybe, individuals related to you (the **Related Individuals**)(the **Data Transfer**) to other entities in the RBC Group or to third-party sub-contractors (together the **Sub-contractors**).

In this letter (the **Notification Letter**), we provide the Investor with relevant information about the context and extent of the Data Transfer and the steps required from you as Investor to object to the Data Transfer, as the case may be.

Both the Luxembourg legislator and the Luxembourg regulator, the *Commission de Surveillance du Secteur Financier* (the **CSSF**), have imposed additional requirements on (among others) Luxembourg credit institutions, such as RBC, for them to be able to lawfully share personal and confidential data of the Fund and the Fund's Investors with Sub-contractors. The personal and confidential data in question include (but is not limited to) the Investor's or the Related Individuals' identification data and documents (notably first name, last name, telephone number and email address, national identifiers such as passport number, identification code, tax identification number or national insurance numbers and personal features such as date and country of birth, as applicable), account information, contractual and other documentation and transactional information of the Investors (the **Confidential Information**).

As a result, and in order to allow the transfer of Confidential Information as part of the Data Transfer to Sub-contractors, the Fund needs to inform its Investors and obtain their consent to the Data Transfer.

1. PURPOSE AND FEATURES OF THE DATA TRANSFER

The outsourcing arrangements implemented by RBC, and the resulting Data Transfer to Sub-contractors, are a necessity to enable RBC to provide its services with the expected level of performance, efficiency and quality to the Fund and, indirectly, its Investors.

A description of the purposes of the relevant outsourcing arrangements set-up by RBC, the Confidential Information that may be transferred to Sub-contractors thereunder, as well as the country where those Sub-contractors are located, is set out in the Annex 1 appended to this Notification Letter.

The Sub-contractors may not be subject to Luxembourg professional secrecy obligations and the professional secrecy obligations applicable to them (if any) may be less stringent than the Luxembourg professional secrecy legislation. This being noted, RBC is legally bound to, and has committed to the Fund that it will, only enter into outsourcing arrangements with Sub-contractors which are either subject to professional secrecy

obligations by application of law or which will be contractually bound to comply with strict confidentiality rules.

RBC further committed to the Fund that it will take reasonable technical and organisational measures to ensure the confidentiality of the Confidential Information subject to the Data Transfer and to protect Confidential Information against unauthorised processing. Confidential Information will therefore only be accessible to a limited number of persons within the relevant Sub-contractor on “a need to know” basis and following the principle of the “least privilege”. Unless otherwise authorised/required by law, or in order to comply with requests from national or foreign regulatory or law enforcement authorities, the relevant Confidential Information will not be transferred to entities other than the Sub-contractors.

2. INVESTOR’S CONSENT TO THE DATA TRANSFER

You will be deemed having received the relevant information regarding the outsourcing arrangements implemented by RBC, the Confidential Information transferred thereunder and the location of Sub-contractors to which Confidential Information is transferred, as set out in the Annex 1.

Should you object to the transfer of your Confidential Information to Sub-contractors by RBC, you may request redemption of your shares free of charge at any time before 15 March 2022.

If you do not object as described above, you will be deemed as having consented and agreed to the transfer of the Confidential Information to the Sub-contractors, as set out in Annex 1.

3. DATA PROTECTION ASPECTS

Your Investor’s rights, with regards to the processing of your personal data, as defined and described in the Fund’s prospectus, are fully applicable to the Data Transfer to the extent relevant.

Please undertake that, where Confidential Information relating to Related Individuals, such as representatives, contact persons, directors, beneficial owners or other natural persons relating to the Investor are subject to the Data Transfer, such persons must be provided with the information contained in this Notification Letter as well as with the Fund’s prospectus.

You acknowledge that the Confidential Information will be held by the Sub-contractors following the Data Transfer, and may therefore be subject to data processing by them.

The consent provided in accordance with this letter is only provided for the purposes of lifting the confidentiality obligations of the Fund towards the Investor. From a data protection law perspective, the transfer of personal data will not be based on consent, but on the legal grounds specified in the Fund’s prospectus.

If the matters indicated above do not suit your investment requirements, you may request redemption of your shares free of charge at any time before the applicable dealing cut-off time on 15 March 2022.

The redemptions will be carried out in accordance with the terms of the Fund’s prospectus.

Should you have any questions in relation to this Notification Letter, please contact VAM Global Management Company SA at vamglobalmanco@vamgroupflux.com.

Yours faithfully,

The board of directors of the Fund

ANNEX 1

OUTSOURCED ACTIVITIES

Type of Confidential Information transmitted to Sub-contractors	Country where the Sub-contractors are established	Nature of the outsourced activities
Confidential Information (as defined in the Notification Letter)	Belgium Canada Hong Kong India Ireland Jersey Luxembourg Malaysia Poland Singapore United Kingdom United States of America	<ul style="list-style-type: none"> • Transfer agent/shareholders services (incl. global reconciliation) • Treasury and market services • IT infrastructure (hosting services, including cloud services) • IT system management/operation services • IT services (incl. development and maintenance services) • Reporting • Investor services activities