

# Data Protection Statement (the Statement)



Of Gemini Capital Management (Ireland)  
Limited (the “Company”)



**Data Protection Notice,  
GemCap Investment Funds (Ireland) Plc (the “Company”)**

Dear Shareholder,

The following data protection notice is being provided to you in accordance with the Irish Data Protection Acts 2018, the EU Data Protection Directive 95/46/EC, the EU ePrivacy Directive 2002/58/EC (as amended), the General Data Protection Regulation (EU 2016/679) and any relevant transposition of, successor or replacement to those laws (**the “Data Protection Laws”**).

This notice is in respect of your Shareholding in a Sub Fund of the Company. In the event that you have sold or transferred your shares in the Sub Fund of the Company, please provide notice of this document to the transferee or purchaser as soon as possible.

In completing the application form to apply for shares in the Sub Fund of the Company, you have provided personal information, which may constitute Personal Data within the meaning of the Data Protection Laws.

The Personal Data of shareholders may be used for the following purposes:

1. to manage the holding in accordance with the terms of the application form;
2. for legitimate business interests;
3. for any specific purpose where the Shareholder has given specific consent; and
4. to comply with regulatory and legal obligations, including; anti money laundering; counter terrorist financing legislation; the Common Reporting Standard (as implemented in Ireland by Section 89 E, Section 891F and Section 891G of the Taxes Consolidation Act (1997) (as amended). Personal financial information may be shared with the Revenue Commissioners, who may in turn share this data with foreign tax authorities. Please consult the Automatic Exchange of Information webpage on [www.revenue.ie](http://www.revenue.ie) for further information in this regard.

Shareholders’ personal data may be disclosed by the Company to its delegates, professional advisors, service providers, regulatory bodies, auditors, technology providers and any authorised agents or related, associated or affiliated companies of the foregoing for the same or related purposes.

In the event that Shareholders’ personal data is transferred to countries which may not have equivalent data protection laws as Ireland, the Company is required to ensure that the processing of such data is in compliance with the Data Protection Laws.

Personal data may be retained by the Company for the period of the Shareholders’ investment and thereafter, in accordance with legal and regulatory requirements, including the Company’s record retention policy.

Shareholder’s have the following rights in respect of their personal data, subject to certain limitations as provided for in the Data Protection Laws:

1. the right of access to personal data held by the Company;
2. the right to amend and rectify any inaccuracies in personal data held by the Company;
3. the right to erase personal data held by the Company;
4. the right to request restriction of the processing of personal data held by the Company; and
5. the right to object to the processing of personal data by the Company.

The Company is a Data Controller within the meaning of the Data Protection Laws. The Company will hold all personal data in confidence and at all times in strict compliance with the Data Protection Laws.

Shareholders have the right to lodge a complaint with the Office of the Data Protection Commissioner in the event that they are dissatisfied with the manner in which their personal data is used by the Company.

In the event of any queries or requests in respect of this notice, or in respect of any queries relating to the Company's data protection policy, please contact Mr. Brian Ormonde Murphy, [brian.ormondemurphy@geminicapital.ie](mailto:brian.ormondemurphy@geminicapital.ie)