

**NEUBERGER BERMAN INVESTMENT FUNDS PLC  
NEUBERGER BERMAN INVESTMENT FUNDS II ICAV**

**PRIVACY STATEMENT – INVESTORS AND RELATED PARTIES**

The purpose of this privacy statement (the "**Privacy Statement**") is to provide Individuals (as defined below) with information on our use of Personal Data (as defined below) in accordance with the EU data protection regime introduced by the General Data Protection Regulation (EU) 2016/679, the "**Data Protection Legislation**").

Each of Neuberger Berman Investment Funds plc ("**NBIF**") and Neuberger Berman Investment Funds II ICAV ("**NBIF II**") (each individually the "**Fund**") will collect and process the Personal Data of natural persons who are: (i) registered shareholders and applicants for shares and/or prospective applicants for shares in the Fund ("**Investors**"); (ii) beneficial owners of shares or applications for shares, personal representatives of Investors or beneficial owners, directors, officers, trustees and / or authorised signatories of Investors ("**Connected Persons**"); and (iii) not Investors or Connected Persons but who otherwise have contact with the Fund for business reasons such as partners, advisors, agents and any natural persons who is employed or engaged by service providers of the Fund ("**Business Contacts**"). In this Privacy Statement, Investors, Connected Persons and Business Contacts are together referred as "**Individuals**". Other information relating to the dealings of Individuals with the Fund and / or its service providers will also be collected and processed.

If you are an institutional investor that provides us with Personal Data on Connected Persons or Business Contacts, this Privacy Statement will be relevant for those Individuals and you should transmit this document to such Individuals or otherwise advise them of its content.

This Privacy Statement explains how the Fund will manage the Personal Data of Individuals, why the Fund uses it, and how Individuals may contact the Fund in relation to the use of Personal Data. In this document, "we", "us" and "our" refer to the Fund and its service providers processing Personal Data on the Fund's behalf.

**Where the Fund needs to process Personal Data in connection with an Investor's contract with the Fund or application for shares in the Fund, or where the Fund has a legal obligation to collect certain Personal Data relating to an Investor or Connected Person (for example, in order to comply with anti-money laundering and anti-terrorist financing (collectively "AML" obligations), the Fund will not be able to deal with the Investor if the Investor or Connected Person does not provide the necessary Personal Data and other information required by the Fund.**

"**Personal Data**" means any information which the Fund has or obtains (including the initial application, and including the recording of electronic communications or phone calls where applicable), or which an Individual provides to the Fund or the Fund's service providers, such as:

- **Identity Data** being details such as name, signature, nationality, residency information, place of birth, date of birth, passport number or similar identifier, signature, marital status, title, online identifiers and gender;
- **Contact Data** being details such as residential address, email address, contact details, corporate contact information, and correspondence records;
- **Financial Data** being details such as bank account numbers, tax identifiers, credit history, source of funds details, information about financial circumstances, including net assets and the size of the investment portfolio, and details relating to investment activity; and

- **Marketing and Communications Data** being details such as preferences in receiving marketing from us and our third parties and communication preferences.

### Use of Personal Data and Basis of Processing

The table below describes the categories of Personal Data that the Fund collects, stores, uses and shares and the lawful ground on which the Fund relies for processing this Personal Data. Generally the Fund does not rely on consent as a legal basis for processing Personal Data. Where, however, the Fund asks for consent to process Personal Data for a particular purpose and it is provided, Individuals have a right to withdraw consent for that processing purpose in writing at any time by contacting the Fund (see the section titled "Contacting the Fund" below). The same Personal Data may continue to be processed for another purpose as described in this Privacy Statement.

Personal Data	Processing Activity and Purpose	Legal Basis for Processing
Identity Data, Contact Data and Financial Data of Investors	<ul style="list-style-type: none"> <li>- provide services to Investors, set up and administer Investors' account(s);</li> <li>- collect subscriptions and pay redemptions, distributions and dividends for Investors;</li> <li>- deal with queries or complaints from Investors.</li> </ul>	Where the Fund needs to perform the contract it is about to enter into or has entered into with an Investor.
Identity Data, Contact Data and Financial Data of Investors and Connected Persons	<ul style="list-style-type: none"> <li>- undertake AML and beneficial ownership due diligence, and fraud prevention due diligence on Investors and Connected Persons, including OFAC and PEP screening for these purposes and to comply with UN, EU and other applicable sanctions regimes and to comply with our obligations under the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 (as amended);</li> <li>- ensure that beneficial ownership information is held on a central register, pursuant to the relevant applicable law namely, the European Union (Anti-Money Laundering: Beneficial Ownership of Corporate Entities) Regulations 2019 (S.I. 110 of 2019) (modified by the European Union (Modifications of S.I. No. 110 of 2019) (Registration of Beneficial Ownership of Certain Financial Vehicles Regulations 2020) (S.I. No. 233 of 2020) or the European Union (Anti-Money Laundering: Beneficial Ownership of Trusts) Regulations 2021 (S.I. No. 194 of 2021);</li> <li>- comply with regulatory requirements applicable to managing your investment, in particular under the European Union (Alternative Investment Fund Managers) Regulations 2013, the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations 2011, as well</li> </ul>	Where the Fund needs to comply with its Irish and EU legal or regulatory obligation.

	<p>as the Central Bank of Ireland's AIF Rulebook, guidelines and policy updates issued by the Central Bank of Ireland from time to time;</p> <ul style="list-style-type: none"> <li>- maintain statutory registers including in accordance with the Companies Act 2014 (for NBIF only) and the Irish Collective Asset-management Vehicles Act 2015 (for NBIF II only);</li> <li>- comply with tax and regulatory reporting obligations such as our obligations under the Taxes Consolidation Act 1997;</li> <li>- disclose information where the Fund is subject to an order of a court with appropriate jurisdiction;</li> <li>- comply with Irish and EU member state legal sanctions requirements; and/or</li> <li>- comply with requests from EU and EU member state regulatory, governmental, tax and law enforcement authorities.</li> </ul> <p>All references to laws are as may be amended, supplemented, consolidated, substituted in any form or otherwise modified from time to time.</p>	
<p>Identity Data, Contact Data, Financial Data, Marketing and Communications Data of Individuals</p>	<ul style="list-style-type: none"> <li>- for day to day operational and business purposes;</li> <li>- to take advice from the Fund's external legal and other advisors;</li> <li>- board reporting and management purposes, including quality assurance, business and statistical analysis for tracking fees and costs, or for customer service and training-related purposes;</li> <li>- for direct marketing purposes (that is, providing Individuals with information on products and services) or for quality control, business and statistical analysis or for tracking fees and costs or for customer service, training and related purposes;</li> <li>- in the event of a merger or proposed merger of the Fund or any sub-fund of the Fund, or any other restructuring or reorganisation of the Fund or any sub-fund of the Fund or relating to the assets of the Fund or any sub-fund of the Fund; or</li> <li>- where necessary to establish, exercise or defend its legal rights or for the purpose of legal proceedings;</li> </ul>	<p>Where such processing is necessary for the Fund's <b>legitimate interests</b> in protecting its business interests including managing and developing its business.</p>
<p>Identity Data, Contact Data, Financial Data, Marketing and Communications Data of Individuals</p>	<ul style="list-style-type: none"> <li>- for day to day operational and business purposes;</li> <li>- investor relationship management;</li> </ul>	<p>Where such processing is for a <b>legitimate interest</b> of Neuberger Berman Asset Management Ireland Limited, Neuberger Berman</p>

	<ul style="list-style-type: none"> <li>- calculation and payment by the recipient of commissions and rebates; and</li> <li>- compliance with the laws of third countries.</li> </ul>	<p>Europe Limited, or another company in the Neuberger Berman group of companies, the Fund's administrator, or of a third party to which the Fund provides the Personal Data in protecting their business interests including managing and developing their businesses.</p>
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## Disclosure of Personal Data

The Fund will not disclose any Personal Data to any third party, except as outlined above and / or as follows:

1. to anyone providing a service to the Fund or acting as the Fund's agent (which may include the distributors, the investment managers and the administrator or companies within their group of companies, and it's or their sub-contractors), as data controllers and/or data processors, for the purposes of providing services to the Fund and on the understanding that they will keep the Personal Data confidential. A copy of NBIF II's administrator's privacy statement is available at [www.jpmorgan.com/privacy/EMEA](http://www.jpmorgan.com/privacy/EMEA) and this provides information on when J.P. Morgan acts as a data controller in respect of Personal Data;
2. where Personal Data needs to be shared with the depositary appointed to the Fund, in order to enable it to discharge its legal and regulatory obligations;
3. in limited circumstances, where the administrator to the Fund is subject to a separate legal obligation requiring it to act as data controller of the Personal Data, including where it is required to use the Personal Data for the discharge of its own AML obligations, or where an Investor or Connected Person has otherwise consented to the Personal Data bring shared with the administrator for specific purposes;
4. where the registered shareholder or applicant for shares is a client of Neuberger Berman, a third party financial advisor or investment manager, or a company within its or their group of companies, or with such company or advisor for the purposes outlined above;
5. where the Fund needs to share Personal Data with its auditors, and legal and other advisors;
6. in the event of a merger or proposed merger, any (or any proposed) transferee of, or successor in title to, the whole or any part of the Fund's business, and their respective officers, employees, agents and advisors, to the extent necessary to give effect to such merger; and /or
7. the disclosure is required by law or regulation, or court or administrative order having force of law, or is required to be made to any of the Fund's regulators.

Should we wish to use your Personal Data for other specific purposes (including, if applicable, any purpose that requires your consent), we will contact you.

As noted above, our service providers (e.g. administrator, depositary, distributors) may use your Personal Data where this is necessary for compliance with a legal obligation to which it is directly subject (e.g. to comply with applicable law in the area of AML, where required for global tax reporting purposes

or where mandated by a court order or regulatory sanction). The service provider, in respect of this specific use of Personal Data, acts as a data controller. For the avoidance of doubt, the service provider will not at any time be acting as a joint controller with the Fund. Please contact the service provider if you require further information on its processing activities or the specific legal obligations which it is necessary for it to process your Personal Data.

### **International transfers**

The Fund may, in certain circumstances, transfer Personal Data outside the European Economic Area (the “**EEA**”) for the purposes set out in this Privacy Statement.

As of the date of this Privacy Statement, the Fund only transfers Personal Data outside the EEA to the United Kingdom, which has an adequacy decision in place with the European Commission (the “**Commission**”).

If required, any additional transfers of Personal Data by us outside the EEA shall be subject to appropriate safeguards being in place in accordance with the conditions in the Data Protection Legislation. For the avoidance of doubt, safeguards in the form of Commission approved standard contractual clauses will be implemented by Neuberger Berman where Personal Data is transferred outside the EEA to countries which have not been deemed by the Commission to have adequate protection. Please contact us if you wish to obtain more information on the appropriate safeguards. See the section titled "Contacting the Fund" below.

### **Special Category Personal Data**

Some of this Personal Data may be “special category” Personal Data, such as data revealing racial or ethnic origin, political opinions, or trade union membership. The Fund may, in limited circumstances, collect and process this data in connection with its obligations under applicable AML laws. Any special category Personal Data will only be used and disclosed, as necessary, for such purpose.

We do not intend to or knowingly collect or solicit Personal Data from children under the age of 18. **If you are under the age of 18, do not provide us with any personal data.**

### **Third Party Providers of Information**

The Fund may obtain Personal Data relating to Investors and Connected Persons from someone other than that Individual when carrying out due diligence, to take advice from the Fund's external legal and other advisors and to tailor marketing communications to Individuals. This may include Personal Data relating to beneficial owners, partners, directors, officers, employees, advisors or other related persons of an investor or of the person providing the Personal Data. The Personal Data may be obtained from a variety of sources, such as financial advisors to Investors, employers of Investors or Connected Persons, and / or direct and indirect service providers to the Fund, such as vendors providing AML and checking sanctions databases. We may also obtain Personal Data on you and persons connected with you from public sources such as sanctions lists published by the EU, the UN Security Council and other public authorities, the Companies Registration Office, the Central Bank of Ireland and market data providers such Bloomberg and Thomson Reuters. The person providing the information will be asked to warrant that it will only do so in accordance with the Data Protection Legislation, and that it will ensure that before doing so, the Investors or Connected Persons in question are made aware of the fact that the Fund will hold information relating to them and that it may use it for any of the purposes set out in this Privacy Statement, and where necessary that it will obtain consent to the Fund's use of the information. The Fund may, where required under applicable law, notify those Investors or Connected Persons that it has been provided with their Personal Data and provide a copy of this Privacy Statement

to them. For the avoidance of doubt, if you are providing Personal Data on behalf of another Individual, you should transmit a copy of this Privacy Statement to such Individual(s) or otherwise advise them of its content.

### **Recipients of the Personal Data**

In any case where the Fund shares Personal Data with a third party data controller (including, as appropriate, Neuberger Berman Europe Limited, Neuberger Berman Asset Management Ireland Limited or other members of the Neuberger Berman group), the use by that third party of the Personal Data will be subject to the third party's own privacy policies.

### **The Data Protection Measures We Take**

The Fund applies appropriate information security measures designed to protect data in its possession from unauthorised access by third parties or any form of computer corruption.

The Fund will notify you of any Personal Data breach affecting you that is likely to result in a high risk to your rights and freedoms.

### **Updates to Personal Data**

The Fund will use reasonable efforts to keep Personal Data up to date. However, each Individual will need to notify the Fund's manager, Neuberger Berman Asset Management Ireland Limited by emailing [funds\\_cseurope@nb.com](mailto:funds_cseurope@nb.com) or by directly contacting your Neuberger Berman relationship adviser, without delay in the event of any change in their personal circumstances, or those of the others mentioned above, so that the Fund can keep the Personal Data up to date.

### **Retention of Personal Data**

The Fund is obliged to retain certain information to ensure accuracy, to help maintain quality of service and for legal, regulatory, fraud prevention and legitimate business purposes.

It is obliged by law to retain AML related identification and transaction records for six (6) years from the end of the relevant investor relationship or the date of the transaction respectively.

Other information will be retained for no longer than is necessary for the purpose for which it was obtained by the Fund or as required or permitted for legal, regulatory, fraud prevention and legitimate business purposes. In general, the Fund (or its service providers on its behalf) will hold this information for a period of seven (7) years, unless it is obliged to hold it for a longer period under law or applicable regulations.

The Fund (or its service providers on its behalf) will also retain records of telephone calls and any electronic communications for a period of five (5) years and, where requested by the Central Bank of Ireland, for a period of up to seven (7) years.

Thereafter, we will refrain from collecting any further Personal Data on you and shall take appropriate steps to dispose of, delete or anonymise any records containing your Personal Data, to the extent this is operationally feasible and proportionate. Where your Personal Data has been anonymised, we may retain this information indefinitely.

## **An Individual's Rights in relation to Personal Data**

An Individual may at any time access (in an easily readable form) and examine a copy of their Personal Data from the Fund. This right can be exercised by writing to the Fund - See the section titled "Contacting the Fund" below.

An Individual also has the right to correct any inaccuracies in and in certain circumstances, to request erasure, or restriction on the use, of their Personal Data, and to object to certain uses of their Personal Data, in each case subject to the restrictions set out in applicable data protection laws. Further information on these rights, and the circumstances in which they may arise in connection with the Fund's processing of Personal Data can be obtained by writing to the Fund at the address specified below.

In any case where the Fund is relying on an Individual's consent to process their Personal Data that Individual has the right to change their mind and withdraw consent by writing to the Fund at the address specified below.

Where the Fund is relying on a legitimate purpose of the Fund, a member of the Neuberger Berman group of companies or a third party recipient of the Personal Data, in order to use and disclose Personal Data, an Individual is entitled to object to such use or disclosure of their Personal Data, and if they do so, the Fund will cease to use and process the Personal Data for that purpose unless the Fund can show there are compelling legitimate reasons for it to continue or it needs to use the Personal Data for the purposes of legal claims.

In limited circumstances, an Individual may also have the right to data portability in respect of certain of their Personal Data, which means they can request that the Fund provide it to them in a structured, commonly used and machine-readable format, or transmit it to their third party nominee where this is technically feasible.

An Individual also has the right to lodge a complaint about the processing of their Personal Data by the Fund with the Irish [Data Protection Commission](#) or with the local data protection authority in their home or work EU member state.

## **Contacting the Fund**

Any queries or complaints regarding the use of the Personal Data by the Fund and / or the exercise of individual rights should be addressed to the Fund at [nbeuropedataprotection@nb.com](mailto:nbeuropedataprotection@nb.com).

**Last updated: 8 August 2025**