



Privacy Notice

WisdomTree Issuer plc

WisdomTree Management Limited

September 2018

Introduction

This privacy notice (the “**Privacy Notice**”) discloses the personal data gathering and dissemination practices used by WisdomTree Issuer plc and WisdomTree Management Limited (“**WisdomTree**”, “**we**”, “**our**” or “**us**”) as data controller. Each of us is providing this Privacy Notice to you as a separate legal entity and separate data controller in respect of your data.

WisdomTree reserves the right to modify this Privacy Notice at any time and we will make an updated copy of such privacy notice available on our website and notify you when we make any substantial updates. Please ensure that you provide a copy of this Privacy Notice to any third parties whose personal data you provide to us.

"Personal data" means any data relating to an identified or identifiable living individual. WisdomTree will use your personal data only for the purposes and in the manner set forth in this Privacy Notice which describes the steps taken to ensure our processing of your personal data is in compliance with the General Data Protection Regulation ((EU) 2016/679) ("**GDPR**") and any implementing legislation ("**Data Protection Legislation**").

Confidentiality

WisdomTree will keep your personal data confidential and only use it within our group (which means our affiliated companies, successors and assigns), and only transfer it to third parties in the manner described in the below section labelled “Use of third parties”, unless we are under a duty to disclose or share your personal data in order to comply with a court order or other legal or regulatory requirement.

How and why we collect personal data

WisdomTree may obtain personal data about you from third parties or through other business activities, such as us obtaining investor reports from CREST. The categories of personal data and the data processing activities that WisdomTree will carry out are set out at Appendix A. WisdomTree will retain and process your personal data only when this is necessary to achieve our commercial or business objectives and to comply with our regulatory obligations.

WisdomTree will always ensure its business interest does not override your rights and freedoms as an individual. We may also retain your information to comply with any applicable laws or regulations. We are legally required to hold some types of information to fulfil our statutory and regulatory obligations. These obligations include regulations made by the Central Bank of Ireland ("CBI").

As a principle, WisdomTree will only retain your personal data for such period of time as is necessary to serve our business interest and will not process personal data beyond that point. If you ask for your personal data to be removed, we may still keep it in our records

for 7 years to comply with CBI requirements and will proceed to delete it afterwards provided there is no other reason which makes it necessary for us to keep the personal data (e.g. an investigation or pending court case).

How we store, transfer and process personal data

All personal data that you provide to us is stored on secure servers. Personal data may be transferred, stored and processed by third parties (see below). It may also be processed by staff operating outside the European Union (“EU”) who work for us.

You should be aware that in territories outside the EU, laws and practices relating to the protection of personal data are likely to be different and, in some cases, may be weaker than those within the EU.

Such transfers outside the EU will only take place where either (i) the Commission has decided that such third country ensures an adequate level of protection (GDPR Article 45); or (ii) we have provided appropriate safeguards, and on the condition that enforceable rights and effective legal remedies are available for you (GDPR Article 46).

Inter-entity safeguards have been placed between WisdomTree and its parent company in the United States to ensure all internal personal data transfers are compliant with GDPR (GDPR Article 46).

Use of third parties

Communicating via the internet and sending information to you by other means necessarily involves your personal data passing through or being handled by third parties, but we do not sell or distribute without your permission your personal data to third parties for purposes of allowing them to market products and services to you.

We have also reviewed all key third party agreements where EU personal data is being processed to ensure they are GDPR compliant and that your rights described herein are being protected.

What safeguards we have in place

WisdomTree has security measures in place to protect the loss, misuse and alteration of the information under our control. As no data transmission over the internet can be guaranteed as 100% secure, we cannot ensure or warrant the security of any information you transmit to us and you transfer the data at your own risk. We endeavour to use appropriate security measures, including systems security, backups, business recovery and breach notification procedures, monitoring and testing procedures.

What rights you have with regards to your personal data we process

You can request a copy of the personal data we hold about you. You also have the right to ask for your personal data to be transferred to another organisation or to yourself. Where such requests are manifestly unfounded or excessive, we will inform you and we may charge a reasonable fee or refuse to respond to such a request.

You have a right to object to the processing of your personal data in those cases where we are processing your personal data in reliance on our legitimate interests. In such a case we will stop processing your personal data unless we can demonstrate compelling legitimate interests which override your interests and you have a right to request information on the balancing test we have carried out.

You also have the right to ask us not to process your personal data for marketing purposes. We will inform you if we intend to use your personal data for such purposes. You can exercise your right to prevent such processing by contacting us directly. You can also exercise the right and change your marketing preferences or restrict any specific uses of your personal data at any time by contacting us.

If we are processing your personal data on the legal basis of consent, you are entitled to withdraw your consent at any time (see Contact Us below). However, the withdrawal of your consent will not invalidate any processing we carried out prior to your withdrawal and based on your consent.

The accuracy of your personal data is important to us. We review information we hold to ensure it is up to date and accurate. You have the right to correct any inaccuracies in the details we hold about you – if you change your email address or notice any other information we hold is inaccurate or out of date, please contact us. You have the right to obtain without undue delay the rectification of any inaccurate personal data concerning you.

If you wish to exercise any of these rights, please contact us (see Contact Us below). We have appointed WisdomTree UK Limited to be our EU representative in relation to GDPR. We will respond to your request within one month. That period may be extended by two further months where necessary, taking into account the complexity and number of requests. We will inform you of any such extension within one month of receipt of your request. We may request proof of identification to verify your request. We have the right to refuse your request where there is a basis to do so in law, or if it is manifestly unfounded or excessive, or to the extent necessary for important objectives of public interest.

Consequences of Failure to Provide Personal Data

If we cannot collect or process your personal data, we may not be able to provide you with, or administer, your investment. If we ask for information and you do not wish to give it to us, we will explain the consequences based on the specific information concerned including whether it is a legal or contractual requirement that we use such personal data. If you have any queries in respect of the consequences of not providing data, please contact us using the details listed below.

Complaints

You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your residence, place of work or place of an alleged infringement, if you consider that the processing of your personal data infringes the GDPR.

Contact Us

If you have any questions regarding this Privacy Notice and our privacy practices, please contact us as listed below:

WisdomTree Issuer plc	WisdomTree Management Limited
25-28 North Wall Quay, North Wall, Dublin 1, D01 H104, Ireland Email:GDPR@wisdomtree.com	25-28 North Wall Quay, North Wall, Dublin 1, D01 H104, Ireland Email: GDPR@wisdomtree.com

APPENDIX A
DATA PROCESSING ACTIVITIES

Categories of data subject	Type of Personal Data	Type of processing	Purpose of processing	Categories of recipient to whom Personal Data is transferred	Retention period	Lawful ground for processing
Investor (including officers and signatories of institutional investors)	Name, address, contact details, tax number and bank details, details of investment, documentation to verify identity and address and bank details	Obtaining, reviewing, verifying, storing, running adverse news checks. Keeping records updated	Complying with legal obligations under AML/ CTF sanctions regimes, and to prevent fraud, bribery, corruption, tax evasion	Transfer agent/ Administrator/ Depository/ Distributor	7 years after investor ceases to be an investor	Complying with legal and regulatory obligations
	Name, address, tax number	Obtaining, reviewing, verifying, storing, submitting reports, keeping records updated	Complying with FATCA/ CRS/ Tax reporting law	Tax authorities	7 years after the termination of the investment	Complying with legal and regulatory obligations

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Investor (including officers and signatories of institutional investors)	Name, address, bank details	Obtaining, reviewing, storing, submitting keeping up to date	To facilitate payment of distributions (dividends and redemptions)	Banks, Depository	7 years after the termination of the investment	Legitimate Interests including in managing our business provided such interests are not overridden by the data subjects' interests and rights. Complying with legal and regulatory obligations
Directors	Name, address, contact details, number. Information on experience, qualifications, employment history and any issues	Obtaining, reviewing, verifying, storing, running searches, adverse news checks. Keeping records updated	Complying with legal obligations and other regulations	Central Bank of Ireland, and other governmental and regulatory bodies.	7 years after the termination of the office	Complying with legal and regulatory obligations
	Name, address contact details, tax number.	Obtaining, reviewing, storing, submitting keeping up to date	To facilitate payment of fees and expenses and tax and social welfare thereon	Banks, Depository	7 years after the termination of the office	Contractual necessity

Categories of data subject	Type of Personal Data	Type of processing	Purpose of processing	Categories of recipient to whom Personal Data is transferred	Retention period	Lawful ground for processing
Designated Persons & MLRO	Name, address, contact details. Information on experience, qualifications, employment history	Obtaining, reviewing, storing, submitting keeping up to date	Complying with legal obligations and other regulations	Central Bank of Ireland, and other governmental and regulatory bodies.	7 years after the termination of appointment	Contractual necessity, Complying with legal and regulatory obligations
Data subject whose Personal Data is contained in agreements with APs or counterparties e.g. signatory lists, email addresses	Name, work address and contact details	Obtaining, reviewing, storing, submitting keeping up to date	The facility operators of the relevant agreements/trades with the counterparty and otherwise in accordance with such agreements/trades	Investment manager, Administrator; Depository	7 years after the termination of the investment	Contractual necessity