



Last reviewed: February 2025

Privacy Notice – For Data Subjects in United Kingdom, European Economic Area, and Switzerland

1. Who we are

This Privacy Notice explains how and why TD Bank Group ("TD") handles your Personal Data (as defined in section 2 below). Any reference to “we”, “us”, “our”, or “they” includes each of the entities listed in Appendix A.

This Privacy Notice is provided by each of the entities listed in Appendix A, only to the extent that it is regarded as a “data controller” under applicable data protection laws. In such circumstances, each entity is an independent data controller under applicable data protection laws.

The words “you” and “your” in the context of processing Personal Data of individuals shall be understood to mean and relate to the Personal Data of any individual whose data is processed by us (such as your directors, officers, employees, etc. as the context may require) in relation to products and services which are offered by TD Global Investment Solutions.¹

TD Epoch operates the Epoch Investment Funds plc, an open-ended umbrella investment company incorporated with variable capital in Ireland. TDAM operates the TD Greystone Infrastructure Fund (Luxembourg Feeder) SCSp, a special limited partnership incorporated in Luxembourg (herein “investment vehicles”). Where you are investing in our investment vehicles, we may process your Personal Data as set out in this Privacy Notice. In addition, the administrators of these respective investment vehicles will process your Personal Data as set out in their respective privacy notices, which can be found online at:

- State Street Privacy Policy - <https://www.statestreet.com/disclosures-and-disclaimers/privacy> - for investors of the Epoch Investment Funds plc
- Bank of New York Mellon Privacy Notice -

¹ TD Global Investment Solutions represents TD Asset Management Inc. (“TDAM”) and Epoch Investment Partners, Inc. (“TD Epoch”). TDAM and TD Epoch are affiliates and wholly owned subsidiaries of The Toronto-Dominion Bank. TD Global Investment Solutions works with affiliates, third-party distributors, and intermediaries in various jurisdictions to provide asset management services to institutional investors globally.

<https://www.bnymellon.com/emea/en/privacy-policy.html> - for investors of the TD Greystone Infrastructure Fund (Luxembourg Feeder) SCSp.

2. Our commitment to protect your privacy

Your privacy is important to us. We recognize that you entrust your Personal Data to us, and we understand the importance of maintaining its confidentiality and security. As used in this Privacy Notice, "Personal Data" means any information related to you as an identified or identifiable natural person (such as name, address, date of birth, personal identification numbers, sensitive personal data, and economic information). We may collect, use, share, or otherwise handle your Personal Data which is required to maintain your relationship with us. We are committed to processing your Personal Data responsibly, transparently, and securely, and in accordance with the privacy laws applicable to us. These may include the following regulations in the United Kingdom, the European Economic Area, and Switzerland:

- The UK General Data Protection Regulation ("UK GDPR") and Data Protection Act 2018 ("DPA")
- The EU General Data Protection Regulation ("EU GDPR") and national laws which gave further effect to the EU GDPR.
- The Swiss Federal Act on Data Protection ("FADP")

This Privacy Notice explains how we manage your Personal Data including how we collect and hold your Personal Data and the purposes for which we collect, hold, use, and disclose your Personal Data. It also explains how you can exercise your personal rights and how you can make a complaint relating to our handling of your Personal Data

3. Types of Personal Data we may collect and hold and how we collect it

We will collect and use only as much Personal Data from you as is necessary to be able to provide you with the products and services you have requested from us.

In providing services or products to you, we may receive Personal Data about a range of individuals connected to you. This may include your authorized signatories, beneficial owners, directors, officers, employees, or staff members. Whenever you or a corporate representative within your organisation provide us with Personal Data about those individuals, you warrant that you have provided this Privacy Notice to them, obtained any necessary consents or are otherwise entitled to provide this information to us and for it to be processed by us as described in this Privacy Notice and that to the best of your knowledge, the Personal Data is correct and current. It is your responsibility to ensure that the Personal Data provided to us is accurate and to inform us of any change. While you are not required to supply any of the aforementioned Personal Data to us, if you do not provide us with your Personal Data when requested, it may prevent us from being able to maintain or provide service to you.

The Personal Data we may collect and hold includes:

- Personal and contact details, including your:
 - Name, address, signature, occupation, job title, email address, phone number(s), fax number(s), age/date/place of birth, and other contact information;
 - Copies of documents that provide identifiable information such as source of wealth, utility bills, bank statements and tax residency;
- Identification information issued by governments that may contain your identification number, photo, signature, nationality, date and place of birth, including your:
 - Driver's license, passport, or other national identification;
- Interaction information, including:
 - Records of any correspondence relating to interactions and transactions you have with us involving products and services, responses to promotional materials, enquiries, feedback and any complaints.
 - Online services related information (e.g., IP address), CCTV footage.

Sometimes we may also need to collect and hold "Sensitive Information" about you such as, information about your health (e.g., dietary restrictions, special access requirements) or your criminal record. We may become aware of criminal history during our financial crime checks, such as anti-fraud procedures and anti-money laundering checks, including information received from public sources. We will process this data in connection with our legal obligations and for the detection and prevention of crime.

Should we require your consent, we will provide you with details of the Personal Data we would like and the reason for collecting it, so that you can carefully consider whether you wish to consent.

You will be the primary source for your Personal Data, for example via an application package, or other forms/material that you provide to us over email or the Internet. We may also collect your Personal Data in person and over the phone. However, in some instances we may collect Personal Data about you from third parties or our affiliates for the purposes listed in the next section.

4. Purposes for which we collect, hold, process, and disclose your Personal Data

We will collect Personal Data in order to provide services to you. Our use of your information is based on performance of services and other legitimate business interests, and as required by law to provide our services. For example, as noted below, we are required by law to obtain "know-your-customer (KYC)" information prior to providing you with services, and this KYC process will include formal identification documents and other unique references relating to you.

As explained above, we will only collect, hold, process, and disclose your Personal Data as reasonably necessary for our business purposes and as permitted by law. These purposes for processing your Personal Data and our lawful basis for carrying out the data processing may include:

Description of Data Processing Purposes	Lawful Basis for the Data Processing
Prospect and client administration, relationship management, to manage and administer the account/product or services.	<ul style="list-style-type: none"> • To fulfil our contractual obligations; and • Legitimate Interest – in order to manage our accounts effectively so we can provide a high level of service to our clients. And building and maintaining relationships with our corporate clients and prospects;
Conducting Client Engagement/Outreach.	<ul style="list-style-type: none"> • Legitimate interest – relationship building during onboarding and thereafter.
To assess any investment, as authorized by you under your legal agreement with TDAM or TD Epoch, as applicable.	<ul style="list-style-type: none"> • To fulfil our contractual obligations.
To comply with any legal, regulatory, or compliance requirement or request, or to manage legislative obligations to which we may be subject, including regulatory requirements regarding tax reporting, anti-money laundering, anti-terrorist financing, financial abuse, fraud, and any other criminal activity, as applicable, including monitoring of associated electronic communications.	<ul style="list-style-type: none"> • Where required by law, and • Legitimate interest of the data controller - to operate our business in a prudent manner in accordance with industry standards and applicable laws, and • In the public interest in ensuring the integrity and security of the financial sector.
To assist with, manage and improve the operations, including security, of our entities organization-wide.	<ul style="list-style-type: none"> • Legitimate interest of the data controller - to operate our business in a prudent manner in accordance with industry standards and applicable laws.
To notify you of any changes to our services/ keep you informed of our services.	<ul style="list-style-type: none"> • The processing is necessary for the performance of a contract with you or to take steps prior to entering into a contract with you.
To market our products and services.	<ul style="list-style-type: none"> • Legitimate interest – to operate our business in a sensible manner and to assist with providing you with information that you are interested in.

Description of Data Processing Purposes	Lawful Basis for the Data Processing
In connection with legal and dispute management.	<ul style="list-style-type: none"> • The processing is necessary for pursuing our legitimate business interests, provided that those interests do not override your fundamental rights and freedoms.
For research and statistical analysis with the aim of improving our services.	<ul style="list-style-type: none"> • The processing is necessary for pursuing our legitimate business interests, provided that those interests do not override your fundamental rights and freedoms.
To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all our assets, whether as an ongoing concern or as part of bankruptcy, liquidation, or similar proceeding, in which your information held by us is among the assets transferred.	<ul style="list-style-type: none"> • Legitimate interests – to enable to us to manage our business.
To assist with supporting network and information security, including preventing unauthorized access to our computer and electronic communications systems, preventing malicious software distribution, fraud and other security breaches, for the purposes of prevention of crime and fraud to help with ensuring the security of our systems and further improve its service.	<ul style="list-style-type: none"> • Legitimate interests – to operate our business in a prudent manner and to enable us to implement data security to protect all data and information.
Engaging service providers, contractors or suppliers relating to the operation of our business.	<ul style="list-style-type: none"> • Legitimate interest – to enable us to provide our services as efficiently as possible.

Some of the above purposes will overlap and there may be multiple lawful bases under which we process your Personal Data.

5. Retention of Personal Data

We keep your Personal Data for no longer than is necessary for the purpose(s) for which it was collected (including for the purposes of satisfying any legal, accounting or reporting requirements). This will normally be 5-10 years from the date you cease to use our services, to

enable us to refer to your information in correspondence with you, or in connection with legal or regulatory proceedings. When we no longer require your Personal Data, we take reasonable steps to securely destroy, de-identify or render your Personal Data inaccessible as far as is reasonably and technically possible.

6. Disclosing your Personal Data

We may disclose your Personal Data to our affiliates and to various third parties as detailed directly below, for the purposes explained in section 5 above, or for related purposes listed directly below:

- Regulators or other government agencies and law enforcement authorities (such as the UK Financial Conduct Authority, tax authorities, police, or other such privacy supervisory authorities),
- Prospective buyers, sellers, advisers or partners in order to participate in, or be the subject of, a merger, acquisition or other similar transaction and your Personal Data may be a transferred asset in a business sale.
- TD's professional advisors such as our accountants, auditors, financial advisors, lawyers and other outside professional advisors.
- Third parties where reasonably required to protect our rights, users, systems and services (e.g., legal counsel and information security professionals)
- Service providers engaged by us to help perform our services. Such service providers will include, for example:
 - Other organisations who have relationships and agreements to provide products and services to us to fulfil duties to you, such as third-party brokers and dealers that we use to execute for your accounts,
 - Our agents and related services providers who assist us in the management and administration of our services or provide us with other services connected to the provision of our products and services,
 - Our IT service providers, who provide, service and maintain our online applications and websites,
 - Service providers that assist with regulatory checks such as "know-your-customer (KYC)", anti-money laundering, and fraud detection and prevention checks,
 - Service providers that assist with data storage, data backup, and business continuity management services;
- Any person who you ask to represent you, such as brokers, lawyers, accountants, or other people authorised to represent you, such as an attorney under a power of attorney.

We will never rent or sell your Personal Data.

7. Overseas disclosure of your Personal Data

As we are a global organisation your Personal Data may be stored and processed outside of your home country, including in countries that may not offer the same level of protection for your Personal Data as your home country. When we transfer your Personal Data internationally, we will do so on the basis that the transfer is subject to appropriate measures and safeguards in accordance with data protection laws. Often, these include contractual safeguards. We may share your Personal Data with our affiliates and our service providers located in various jurisdictions, including the United States, Canada, Japan, Hong Kong, Singapore, Australia, United Kingdom, Ireland, and Luxembourg.

All Personal Data shared with our affiliates will be held within the information systems of TD, which operate within various countries as outlined above.

8. Protection of your Personal Data

We have in place a number of technical and organisational measures to protect our systems and your Personal Data, including:

- Access controls: Personal Data is only accessible by a limited number of relevant staff bound by duties of confidentiality,
- IT controls: All electronic information is held on systems that incorporate firewalls, password-controlled access and virus protection procedures,
- Audit controls: We audit our procedures and security measures regularly to help ensure that they are being properly administered and that they remain effective and appropriate in relation to the sensitivity of the information, and
- Physical information will be maintained in a secure cabinet, where appropriate security measures are maintained to prevent unauthorised access.

All of our electronic exchanges of information will go through encrypted channels to prevent your information from being intercepted in transit. For your protection, you should not send confidential or Personal Data to us over the internet (e.g., email) or through any unsecured channel.

Every TD employee is responsible for protecting Personal Data to which they have access. All employees who have access to Personal Data are required, as a condition of employment, to comply with the TD *Code of Conduct* and uphold TD's commitments to privacy to protect the integrity and confidentiality of the Personal Data, in accordance with our internal policies and procedures.

We have put in place procedures to manage any suspected data security breach and will notify you, and any applicable regulator, where we are legally required to do so.

9. Your Rights Concerning Your Personal Data

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us, whether by informing your relationship manager or client service representative. If you wish to access the Personal Data we hold about you, or request a correction, please refer to your rights below.

Subject to certain exceptions, you may have specific rights regarding your Personal Data. This section describes such rights. To exercise your rights, please use the contact details listed in the "Contact Us" section below.

- *Right to access:* You may have the right to access (and obtain a copy of, if required) the categories of Personal Data that we hold about you, including the information's source, purpose and period of processing, and the persons to whom the information is shared.
- *Right to rectification:* You may have the right to update the information we hold about you or to rectify any inaccuracies.
- *Right to erasure:* You may have the right to request that we delete your Personal Data in certain circumstances, such as when it is no longer necessary for the purpose for which it was originally collected.
- *Right to restriction of processing:* You may also have the right to request to restrict the use of your information in certain circumstances, such as when you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it (for example for the establishment, exercise, or defense of a legal claim).
- *Right to object:* You may have the right to object to the use of your information in certain circumstances, such as the use of your Personal Data for direct marketing.
- *Right to data portability:* You may have the right to transfer your information to a third party in a structured, commonly used and machine-readable format, in circumstances where the information is processed with your consent or by automated means.
- *Right to withdraw consent:* You may also have the right to deny consent or withdraw previously given consent to collect and process Personal Data (which will not impact Personal Data processed before the withdrawal).
- *Right to lodge a complaint:* You have a right to lodge a complaint if you feel that we have mismanaged your information. For further details, please see Section 11 below.
- *Right to provide instructions upon death (France only):* You have the right to provide instructions regarding the retention, erasure and communication of your data upon death. Such instructions must be provided at the time of initial contact but can be revoked or modified at any time thereafter.

When you contact us with a right to access, we will confirm receipt of the request as soon as reasonably possible, detailing when to expect receipt, and instructions of how this information will be shared.

You will usually not have to pay a fee for requesting to access your Personal Data. However, we may charge a reasonable fee to cover the cost of gathering the information to comply with

your request. There may be situations where we are not required to provide you with access. A written explanation will be provided to you if we deny you access to the Personal Data we hold about you, to the extent permitted by law.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the Personal Data. This is another appropriate security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

10. Privacy Breaches and Complaints

If you are aware of, or are the victim of, a suspected privacy breach in connection to your relationship with us, you should immediately contact us using the contact details in section 12 below. All suspected privacy breaches are appropriately investigated, and corrective action is taken, if applicable.

If you have a complaint about the way we have managed your Personal Data, please write to us using the contact details listed in the "Contact Us" section below. Once we have received your complaint, we will seek to resolve your concerns as soon as possible and in any case within the time prescribed by the applicable privacy law. If you are dissatisfied with the outcome of your complaint, you have the right to refer your privacy complaint to your local data protection authority using the contact information provided in the chart directly below:

Jurisdiction	Enforcement Authority	Online Contact	Phone or Fax
United Kingdom	Information Commissioner's Office	Via an online complaint form	Phone: +44 0303 123 1113
Member States of the European Economic Area (EEA)	National Data Protection Authority	The contact details of EEA data protection authorities can be found here	
Switzerland	Federal Data Protection and Information Commissioner	Via an online complaint form	Phone: +41 058 462 43 95

11. Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time to reflect changes in law, and when we make material updates to ensure that it is accurate and up to date. We will notify you, whether directly via email notification, or indirectly within our email signatures. We may also notify you in other ways about how we process your Personal Data.

You may request this Privacy Notice in an alternative form by contacting your relationship manager.

12. Contact Us

For all privacy matters, including if you have any questions about this Privacy Notice, a concern or complaint, or if you want to exercise your data subject rights, please contact our Europe and Asia Pacific Privacy Office using the contact details directly below:

Europe and Asia Pacific Privacy Office	
Head of Privacy - Europe and Asia-Pacific	
By mail:	60 Threadneedle Street, London EC2R 8AP
By email:	privacy.eap@td.com

Appendix A

TD Entity Name	Address
Epoch Investment Partners, Inc.	1 Vanderbilt Avenue, New York, NY 10017
TD Asset Management Inc.	TD Canada Trust Tower, 161 Bay Street, 32nd Floor, Toronto, Ontario, M5J 2T2
Epoch Investment Partners UK, Ltd	4th Floor, Carrington House, 126-130 Regent Street, London, W1B 5SE
TD Greystone Infrastructure GP S.À R.L.	12E, rue Guillaume Kroll, L-1882 Luxembourg, Grand Duchy of Luxembourg

TD Global Investment Solutions represents TD Asset Management Inc. ("TDAM") and Epoch Investment Partners, Inc. ("TD Epoch"). TDAM and TD Epoch are affiliates and wholly-owned subsidiaries of The Toronto-Dominion Bank. TD Global Investment Solutions works with affiliates, third-party distributors, and intermediaries in various jurisdictions to provide asset management services to institutional investors globally.

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