

**VOYA GLOBAL MULTI-STRATEGY QUALIFYING INVESTOR FUND PLC**  
**VOYA ALTERNATIVE ASSET MANAGEMENT IRELAND LIMITED**

**PRIVACY STATEMENT**

Each of Voya Global Multi-Strategy Qualifying Investor Fund plc and Voya Alternative Asset Management Ireland Limited (the “**AIFM**”) in respect of Voya Global Multi-Strategy Master Qualifying Investor Fund (collectively the “**Funds**”) and the AIFM in its capacity as alternative investment fund manager to the Funds (collectively and individually (as the case may be), “**Voya**”) will collect and process the Personal Data of natural persons who are registered shareholders or unitholders (“**Registered Shareholders**”), applicants for shares or units, beneficial owners of Registered Shareholders and applicants for shares or units, personal representatives, financial advisors, directors, officers, employees, agents, trustees and / or authorised signatories of Registered Shareholders and applicants for shares or units in the Funds (“**Individuals**”) and other information relating to the dealings of Individuals with Voya and / or its service providers. This Privacy Statement explains how Voya will manage the Personal Data of such Individuals, why Voya uses it, and how Individuals may contact Voya in relation to the use of Personal Data.

**Where Voya needs to process Personal Data in connection with a Registered Shareholder’s contract in respect of a Fund or in anticipation of an applicant for shares becoming a Registered Shareholder in a Fund, or where Voya has a legal obligation to collect certain Personal Data relating to an Individual (for example, in order to comply with AML obligations), Voya will not be able to deal with the Registered Shareholder or applicant for shares or units if the Individual does not provide the necessary Personal Data and other information required by Voya.**

Personal Data means any information which Voya has or obtains, or which an Individual provides to Voya or the Funds’ service providers, such as his / her name, address, email address, date of birth etc, from which that Individual can be directly or indirectly personally identified, and may include information such as identification and account numbers, tax identifiers and residency information, and online identifiers. Some of this Personal Data may be sensitive Personal Data, such as data revealing political opinions, or trade union membership.

**Use of Personal Data and Basis of Processing**

Voya will use the Personal Data:

1. for the purposes of performing the contract with a Registered Shareholder, or in anticipation of an applicant for shares or units becoming a Registered Shareholder, namely:
  - (a) where necessary for the performance of a contract between Voya and an Individual Registered Shareholder, or the implementation of pre-contractual measures taken at an Individual’s request;
  - (b) where necessary for the conclusion or performance of a contract concluded in the interest of an Individual;
  - (c) for the purposes of providing services to the Registered Shareholder, and setting up and administering the applicant’s or Registered Shareholder’s account(s), as the case may be;
  - (d) for the collection of subscriptions and payment of redemptions, distributions and dividends;
  - (e) to deal with queries or complaints from Registered Shareholders;

2. for compliance with the Funds' and / or AIFM's legal obligations, including:
  - (a) anti-money laundering and anti-terrorist financing (collectively "**AML**") and fraud prevention purposes, including OFAC and PEP screening for these purposes and to comply with UN, EU and other applicable sanctions regimes;
  - (b) compliance with applicable tax and regulatory reporting obligations;
  - (c) where Voya is ordered to disclose information by a court with appropriate jurisdiction;
3. where use is for a legitimate purpose of Voya, including:
  - (a) for day to day operational and business purposes, including without limitation sharing with service providers for processing on behalf of Voya;
  - (b) to take advice from Voya's external legal and other advisors;
  - (c) board reporting and management purposes;
  - (d) in the event of a merger or proposed merger of a Fund or any sub-fund of a Fund, or any other restructuring or reorganisation of the Funds or any sub-fund of a Fund or relating to the assets of the Funds or any sub-fund of a Fund;
4. where use or sharing is for a legitimate purpose of a company in the Voya group of companies, or of a third party to which Voya provides the Personal Data, including:
  - (a) for day to day operational and business purposes;
  - (b) investor relationship management; and
  - (c) calculation and payment by the recipient of commissions and rebates;
5. where necessary to establish, exercise or defend its legal rights or for the purpose of legal proceedings;
6. where an Individual has consented to use for a particular purpose. If an Individual gives consent for Voya to use his / her Personal Data for a particular purpose, that Individual has the right at any time to withdraw consent to the future use of his / her Personal Data for some or all of those purposes by writing to the address specified below.

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

1. to enable Voya to carry out the obligations under the contract with a Registered Shareholder or in anticipation of an applicant for shares or units becoming a Registered Shareholder;
2. to anyone providing a service to the Funds or AIFM or acting as agent for any of them (which may include distributors, the investment manager, sub-investment managers and companies within their group of companies, the administrator, and its or their sub-contractors), as data processors, for the purposes of providing services to the Funds or AIFM and on the understanding that they will keep the Personal Data confidential;
3. where Personal Data needs to be shared with the depositary appointed to the Funds, in order to enable it to discharge its legal and regulatory obligations;

4. in limited circumstances, where the administrator to the Funds is subject to a separate legal obligation requiring it to act as 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 Individual has otherwise consented to the Personal Data being shared with the administrator for specific purposes;
5. where the Registered Shareholder or applicant for shares or units is a client of a company in the Voya group of companies, with such company, or a third party financial advisor of the Registered Shareholder or applicant for shares or units, for the purposes outlined above;
6. where Voya needs to share Personal Data with its auditors, and legal and other advisors;
7. 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 Voya's business, and their respective officers, employees, agents and advisers, to the extent necessary to give effect to such merger;
8. 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 Funds' or AIFM's regulators.

### **International transfers**

Personal Data may be transferred outside Ireland (i) in connection with administering a Registered Shareholder's account(s) (including the transfer to service providers) and / or in anticipation of an applicant for shares or units becoming a Registered Shareholder; (ii) in accordance with an Individual's instructions; (iii) where an Individual has explicitly consented, and / or (iv) as otherwise required or permitted by law (including where the transfer is necessary for the performance of a contract with an Individual).

Many of the countries will be within the European Economic Area (the "EEA"), or will be ones which the European Commission has approved, and will have data protection laws which are the same as or broadly equivalent to those in Ireland. However, some transfers may be to countries which do not have equivalent protections, and in that case Voya shall use reasonable efforts to implement contractual protections for the Personal Data. While this will not always be possible where Voya is required to transfer the Information in order to comply with and perform the contract with an investor or where it has a legal obligation to do so, any transfers will be done in accordance with applicable data protection laws, including through the implementation of appropriate or suitable safeguards in accordance with such applicable data protection laws.

For the avoidance of doubt, safeguards in the form of EU Commission approved standard contractual clauses will be implemented where personal data is transferred by the Service Providers to sub-processors for processing, or by the Fund to a company in the Voya group of companies. Further information in relation to international transfers can be obtained by contacting Voya.

### **Sensitive Personal Data**

Voya may, in limited circumstances, collect and process Sensitive Personal Data in connection with its obligations under applicable AML laws. Any Sensitive Personal Data will only be used and disclosed, as necessary, for such purpose.

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

Voya may obtain Personal Data relating to Individuals from someone other than that Individual. 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 Individuals, and / or direct and indirect service providers to the Funds and AIFM, such as vendors providing AML and sanctions checking databases. The person providing the information will be asked to warrant that it will only do so in accordance with applicable data protection laws, and that it will ensure that before doing so, the Individuals in question are made aware of the fact that Voya 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 Voya's use of the information. Voya may, where required under applicable law, notify those individuals that they have been provided with their Personal Data and provide a copy of this Privacy Statement to them.

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

In any case where Voya shares Personal Data with a third party data controller (including, as appropriate, members of the Voya group of companies), the use by that third party of the Personal Data will be subject to the third party's own privacy policies.

### **Updates to Personal Data**

Voya will use reasonable efforts to keep Personal Data up to date. However, each Individual will need to notify Voya without delay in the event of any change in his / her personal circumstances, or those of the others mentioned above, so that Voya can keep the Personal Data up to date.

### **Retention of Personal Data**

Voya 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 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 Voya or as required or permitted for legal, regulatory, fraud prevention and legitimate business purposes. In general, Voya (or its service providers on its behalf) will hold this information for a period of seven years, unless it is obliged to hold it for a longer period under law or applicable regulations.

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

An Individual may at any time request a copy of his / her Personal Data from Voya. This right can be exercised by contacting Voya.

An Individual also has the right to correct any inaccuracies in, and in certain circumstances, to request erasure, or restriction on the use, of his / her Personal Data, and to object to certain uses of his / her 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 Voya's processing of Personal Data can be obtained by writing to contacting Voya.

In any case where Voya is relying on an Individual's consent to process his / her Personal Data, that Individual has the right to change his / her mind and withdraw consent by Contacting Voya.

Where Voya is relying on a legitimate purpose of a Fund and / or AIFM, a company in the Voya 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 his / her Personal Data, and if he /she does so, Voya will cease to use and process the Personal Data for that purpose unless Voya 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 his / her Personal Data, which means he / she can request that Voya provide it to him / her in a structured, commonly used and machine-readable format, or transmit it to his / her third party nominee where this is technically feasible.

An Individual also has the right to lodge a complaint about the processing of his / her Personal Data by Voya with the Data Protection Commission at [info@dataprotection.ie](mailto:info@dataprotection.ie).

### **Contacting Voya**

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