

Outsourcing	Description of outsourced service	Type of information transmitted in the context of outsourcing	Country of establishment	Materiality assessment
<p><b>AML support</b></p>	<p>Waystone Centralised Services Ltd provides overall support to the Luxembourg Compliance Function consisting in:</p> <ul style="list-style-type: none"> <li>• Initial AML/CFT screening of new business relationships and their related key persons and beneficial owners in line with Luxembourg AML/CFT requirements under the ultimate supervision and control of the Luxembourg Compliance Function and Lux Conducting Officers of the PSF.</li> <li>• Application of a risk-based AML/CFT methodology to classification of new clients in line with Luxembourg AML/CFT requirements under the ultimate supervision and control of the Luxembourg Compliance Function.</li> <li>• Requesting client due diligence documentation based on the risk assessment and in accordance with Luxembourg AML/CFT requirements under the ultimate supervision and</li> </ul>	<p>Data relating to natural and legal persons allowing to perform initial and ongoing (daily) screening and overall maintenance of customer due diligence files for business relationships</p>	<p>Ireland</p>	<p>Material outsourcing</p>

	<p>control of the Luxembourg Compliance Function.</p> <ul style="list-style-type: none"> <li>• Escalation to Luxembourg Compliance Function and Conducting Officers of any items of concern.</li> <li>• Ongoing automated screening of all business relationships and their related key persons and beneficial owners under the ultimate supervision and control of the Luxembourg Compliance Function.</li> <li>• Ongoing periodic review of client files in accordance with their AML risk assessment under the ultimate supervision and control of the Luxembourg Compliance Function.</li> </ul>			
<b>HR</b>	<p>Use of group shared services by the Luxembourg Human Resources team only for group projects coordination: e.g. use of a common tool (for the staff performance review, holiday management, etc.). Luxembourg HR team remains in charge of matters related to Luxembourg employees.</p>	<p>Personal data on employees of the PSF including social security and payroll data</p>	<p>Luxembourg</p>	<p>Non-material outsourcing</p>
<b>OnBoarding</b>	<p>Use of a group shared services team member in Cashel to assist in the onboarding of new clients This is administrative support only.</p>	<p>Details of the client i.e. Lux legal entity to be taken on together with details of the promoter or</p>	<p>Ireland</p>	<p>Non-material outsourcing</p>

		initiator of the entity		
<b>IT</b>	Use of group shared services IT team of Waystone Management Company (Lux) S.A. and Waystone Ireland Use of external provider - Sopra Steria (a Luxembourg Support PFS) Use of MS Office 365 (including Exchange).	Certain personal data of employees of the PSF together with client data	Luxembourg	Material IT outsourcing
<b>Finance</b>	Use of shared services Finance team at the level of Waystone Management Company (Lux) S.A.: Support services such as assisting in the preparation of financial statements and reportings for the PSF. Invoicing. BDO	Client and staff details in order to prepare financial statements and reporting for the PSF	Luxembourg  (BDO is involved in the annual review of our Manco and Waystone Holdings Sarl Tax declarations.)	
<b>Legal</b>	Used of shared services Legal team at the level of Waystone Management Company (Lux) S.A. Support services such as assisting in the Drafting/reviewing agreements	Legal agreements, fund documents (prospectus/offering memorandum)	Luxembourg	Non-material outsourcing
<b>Internal Audit</b>	EY Luxembourg performs the internal audit for Waystone Corporate Services (Lux).	Information the auditor is legally required or allowed to request.	EY, Luxembourg, (in coordination with office in Ireland)	Material outsourcing