

**PUTNAM INVESTMENTS (IRELAND) LIMITED  
DATA PRIVACY STATEMENT**

In accordance with the General Data Protection Regulation (697/2016/EU) (the “**GDPR**”) and applicable Irish data protection legislation (currently the Irish Data Protection Acts 1988 to 2003) (collectively, “**Data Protection Legislation**”), Putnam Investments (Ireland) Limited, Manager (the “**Manager**”) of Putnam World Trust (the “**Trust**”) and its sub-funds (each a “**Fund**” and, together, the “**Funds**”), being a data controller, must provide you\* with information on how the personal data that you provide as part of your subscription to units in any Fund will be processed by the Manager, its service providers and delegates and their duly authorised agents and any of their respective related, associated or affiliated companies.

As a consequence of your investment, the Manager acting as a data controller may itself (or through third parties including but not limited to State Street Fund Services (Ireland) Limited (the “**Administrator**”), Citibank Europe plc (the “**Transfer Agent**”), The Putnam Advisory Company, LLC (the “**Investment Advisor**”), Putnam Investments Limited together with any sub-distributors that may be appointed by it from time to time (collectively, the “**Distributor**”), the auditor, the company secretary, the money laundering reporting officer, local paying agents, and mailing firms appointed by any of the foregoing (together the “**Service Providers**”)) process your personal information or, to the extent if you are an entity, that of your directors, officers, employees, intermediaries and/or beneficial owners. Save where otherwise expressly provided, any reference in this Data Privacy Statement to “you” or “your” in the context of processing personal data of data subjects shall be understood to mean and relate to the personal data of your directors, officers, employees, intermediaries and/or beneficial owners as the context may require.

In this regard, please note the following:

**Purposes of Processing and Legal Basis for Processing**

The personal data collected from you or provided by you or on your behalf in connection with your holdings in any Funds of the Trust will be collected, stored, disclosed, used and otherwise processed by the Service Providers on behalf of the Manager for the purposes outlined in the table below.

<b>Processing Activity by or on behalf of the Fund</b>	<b>Legal Basis for Processing</b>
Where you are a natural person, managing and administering your holdings in the Trust and any related account on an ongoing basis.	Performance of the contract between the Manager and you.
Where you are a natural person, disclosures to third parties such as auditors, lawyers, other professional advisors, regulatory and tax authorities, and technology providers in the context of the day to day operations of the Trust.	Performance of the contract between the Manager and you.
Where you as an investor are a non-natural person, disclosures to third parties such as auditors, lawyers, other professional advisors, regulatory and tax authorities, and technology providers in the context of the day to day operations of the Trust.	Pursuing the legitimate interests of the Manager in managing and administering the holdings of the non-natural persons in the Trust and any related account on an ongoing basis.
Complying with any applicable legal, tax or regulatory obligations imposed on the Manager/Trust including legal obligations under Fund law, the UCITS Regulations, Central Bank of Ireland UCITS Regulations, under tax law and under anti-money laundering / counter terrorist financing legislation.	Compliance with a legal obligation to which the Manager/Trust is subject.
Recording, maintaining, storing and using recordings of telephone calls and electronic communications that you make to and receive from the Manager, the Service Providers and their delegates or duly appointed agents and any of their respective related, associated or affiliated companies for any matters related to investment in the Trust, dispute resolution, record keeping, security and/or training purposes.	Pursuing the legitimate interests of the Manager and Service Providers, including: any matters related to the administration of your investment in the Trust; dispute resolution; record keeping; security and/or training purposes; and, for the Manager, allowing it to comply with a legal obligation to which it is subject.  Further information relating to the balancing test undertaken by the Manager in respect of such processing is available upon request.

**Please note that where personal data is processed for purposes of legitimate interests, you have a right to object to such processing and the Manager and its appointed Service Providers will no longer process the personal data unless it can be demonstrated that there are compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.**

**Profiling and Screening**

The Manager and its appointed Service Providers may engage in PEP screening and financial sanctions screening programs defined by the European Union (“**EU**”), the United Nations (“**UN**”), the U.K.’s Her Majesty’s Treasury (“**HMT**”) and the U.S. Office of Foreign Assets Control (“**OFAC**”) for the purposes of complying with the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 as may be amended or replaced from time to time and with UN, EU and other applicable sanctions regimes. The implementation of such PEP screening and financial sanctions screening programmes may result in the Manager or its Service Providers refusing an application for Units in the Trust or delaying or refusing to make any redemption payment or distribution payment to you if you, your directors or any beneficial owner of your units appear on such screening programmes. In the event that you are identified as a PEP as a result of the screening process, you may be required to provide additional information and/or documentation to the Manager or its Service Providers. Such processing, which may reveal your political opinion, is considered lawful on the grounds of substantial public interest permitted under Article 9(2)(g) of the GDPR.

### **Undertaking in connection with other parties**

By providing personal data to the Manager, you undertake to be authorised to disclose to the Manager relevant information applicable to the beneficial owner of the investment, to your directors and authorised signatories and to persons that own, directly or indirectly, an interest in the Trust. In this respect you confirm that you have provided these persons with all the information required under applicable data protection law, notably regarding their data protection rights, and received from these persons their authorisation for the processing and transfer of their personal data to us.

### **Disclosures to Service Providers and / or Third Parties**

Personal data relating to you which is collected from you or provided by you or on your behalf may be handled by Service Providers appointed by the Manager and its or their duly appointed agents and any of related, associated or affiliated companies of the Service Providers and/or Manager, for the purposes specified above.

These Service Providers will be obliged to adhere to the data protection laws of the countries in which they operate.

The Manager may disclose your personal data to other third parties where required by law or for legitimate business interests. This may include disclosure to third parties such as auditors, lawyers, other professional advisors, regulatory bodies including the Central Bank of Ireland, taxation authorities, and technology providers. We will also share your personal information with applicable third parties in the event of a reorganization, merger, sale, acquisition, assignment or other disposition of all or a portion of our business, assets or shares.

Your personal data may also be transferred to the Administrator or the Transfer Agent for their own purposes acting as data controllers.

### **Transfers Abroad**

Personal data collected from you or provided by you or on your behalf may be transferred outside of Ireland including to companies situated in countries outside of the European Economic Area (“**EEA**”), which may not have the same data protection laws as in Ireland. These countries include the United States.

Where data transfers outside of the EEA take place, the Manager has taken the necessary steps to ensure that appropriate safeguards have been put in place to protect the privacy and integrity of such personal data, in particular the implementation of GDPR model contract clauses by the Service Providers and their affiliates.

### **Data Retention Period**

The Manager and its appointed Service Providers will retain all information and documentation provided by you in relation to your investment in the Trust for such period of time as may be required by Irish legal and regulatory requirements, being at least six years after the period of your investment has ended or the date on which you had your last transaction with us. In certain circumstances, data may need to be retained for a longer period of time, e.g., where we are in ongoing correspondence with you or a regulatory or tax authority, or where there is an open claim or investigation.

### **Your data protection rights**

Please note that you have the following rights under the GDPR. In each case, the exercise of these rights is subject to the provisions of the GDPR:

- (i) You have a right of access to and the right to amend and rectify your personal data.
- (ii) You have the right to have any incomplete personal data completed.
- (iii) You have a right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you carried out by the Fund infringes the GDPR.
- (iv) You have a right to be forgotten (right of erasure of personal data).
- (v) You have a right to restrict processing.
- (vi) You have a right to data portability (in certain specific circumstances).
- (vii) You also have the right to object to processing where personal data is being processed for direct marketing purposes and also where the Manager is processing personal data for legitimate interests.

Where you wish to exercise any of your data protection rights against the Manager, please contact us via the details provided below under “Contact Us”.

The Manager or its Service Provider will respond to your request to exercise any of your rights under the GDPR in writing, as soon as practicable and in any event **within one month** of receipt of your request, subject to the provisions of the GDPR. The Manager or its Service Provider may request proof of identification to verify your request.

### **Failure to provide personal data**

As outlined in the section titled “**Purposes of Processing and Legal Basis for Processing**”, the provision of personal data by you is required for us to manage and administer your holdings in the Trust and so that we can comply with the legal, regulatory and tax requirements referenced above. Where you fail to provide such personal data in order to comply with anti-money laundering/ counter-terrorist financing or other legal requirements, in certain circumstances, we may be prohibited from making redemption or any applicable dividend payments to you **and/or** may be required to discontinue our business relationship with you by compulsorily redeeming your unitholding in the Trust.

### **Contact us**

If you have any questions about our use of your personal information, please contact the Manager via the Funds’ Transfer Agent, Citibank Europe plc, at the following contact info:

Citibank Europe plc  
Attn: Putnam World Trust Investor Services Team  
Transfer Agency, 3rd Floor  
1 North Wall Quay  
Dublin 1, Ireland

Phone: +353 1622 1837      Fax: +353 1240 1654      Email: [putnaminv@citi.com](mailto:putnaminv@citi.com)

*\*You refers to investors in the Trust save for investors in the Putnam Fixed Income Global Alpha Fund, who have been issued a separate notice.*