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## MULTI-STRATEGY PORTFOLIO

*UCITS under Luxembourg law*

*Société d'Investissement à Capital Variable*

*Société Anonyme*

Registered office: 80, route d'Esch, L- 1470 Luxembourg, Grand Duchy of Luxembourg

R.C.S. Luxembourg: B 73 332

(the "Fund")

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### NOTICE TO THE SHAREHOLDERS OF THE FUND

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The shareholders of the Fund (the "Shareholders") are hereby informed of the following:

#### **1. New Data protection provisions:**

Further to the entry into force of the European Data Protection Regulation of 27th April 2016 (The "GDPR") on 25 May 2018, the Board of Directors has amended as follows the provisions related to data protection in the new version of the prospectus dated September 2018:

*"In accordance with EU Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the "GDPR"), the following categories of personal data of Shareholders contained in any document provided by such Shareholders, may be collected, recorded, stored, adapted, transferred or otherwise processed and used (hereinafter "processed") by the Company and/or the Management Company acting as a "controller" in the meaning of the GDPR: identification data, contact data, professional data, administrative data, financial data and criminal data (e.g. criminal record).*

*By signing the subscription agreement, such data may be processed by the Company and/or the Management Company and/or its delegates for any of the following purposes:*

- Performance of contractual duties and obligations which are necessary for operating the Fund including managing and administering the Fund;*
- Compliance with any applicable laws or regulatory obligation as for example with regards to anti-money laundering identification and CRS/DAC 2/FATCA;*
- Existence of any other legitimate business interests pursued by the Management Company or a third party as for example the development of the business relationship, except where such interests are overridden by the interests or fundamental rights of the Shareholders;*
- Any other situation where the Shareholders has given consent to the processing of personal data.*

*To this end, personal data may be transferred to the National Authorities and processed by the Fund's distributors and any other delegates appointed by the Management Company to support the Company's activities.*

*The Company, the Management Company and/ or any of its delegates and service providers will not transfer personal data to a country outside of the EEA if this country does not offer an adequate level of data protection, thus not offer legal certainty.*

*The Company, the Management Company will not store personal data for a longer period than it is necessary for the purpose(s) it was collected. With regards to the definition of appropriate retention periods, the company and the Management Company shall also comply with any obligations to retain information including legislations in relation to anti-money laundering, GDPR and tax laws and regulations.*

*The Shareholders have at any time the right to request from the Company and the Management Company access, rectification or erasure of their personal data or restriction of processing their personal data or to object to the processing of their personal data as well as the right to data portability.*

*Where processing is based on a consent, the Shareholders have the right to withdraw their consent at any time. In accordance with Article 77 of the GDPR, the Shareholders have the right to lodge a complaint with a supervisory authority (CNPD in Luxembourg) in case of an infringement with the relevant law.*

*The Unitholder can exercise his rights by sending a request to the Management Company.*

*Further details on the terms and conditions on the processing of data are available upon request and free of charge at the registered office of the Management Company."*

#### **2. Benchmark Regulation:**

Further to the entry into force of Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds ("The Benchmarks Regulation"), the Board of Directors of the Fund has added the below section in the prospectus dated September 2018:

*"Benchmarks Regulation: Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds According to the Benchmarks Regulation, the Management Company, acting in accordance with applicable laws, may*

*take several actions, in the event that a benchmark, including any of its consistent indices, materially changes or ceases to be provided, so as to mitigate the risk involved. Various factors, including external factors beyond the control of the Management Company, might result in material changes to, or cessation of, the benchmark, including where an administrator of the benchmark is no longer able to determine a reference rate or other figure for whatever reason; as a consequence, the Management Company shall not be held liable with this regard and will take appropriate actions to safeguard the interest of the shareholders of the Company and the continuity of the Sub-Fund's Investment Objectives and Policies. The Management Company has produced and maintains written plan setting out the actions that it would take in the event that a benchmark is materially changed or ceases to be provided. Those written plans may be obtained free of charge at the Company's registered office. An overview of Benchmarks of the Company's Sub-Funds, including confirmation whether the administrators of the benchmarks are registered or intend to get themselves registered by 1<sup>st</sup> January 2020 at the latest with the competent authority under the Benchmarks Regulation, is available in the Appendix II of the Company's Prospectus."*

### **3. Change of the name of the sub-funds:**

In order to avoid any confusion between the name of the sub-funds of the Fund and the name of the investment solution proposed by the distributor of the Fund, ING Belgium, to its clients, the Board of Directors of the Fund amended the names of the all the sub-funds of the Fund and has deleted the "Kronos" denomination in the name of all the sub-funds.

The following new names of sub-funds will be introduced in the prospectus of the Fund dated September 2018:

MULTI-STRATEGY PORTFOLIO – MSP PURE BOND  
MULTI-STRATEGY PORTFOLIO – MSP DEFENSIVE  
MULTI-STRATEGY PORTFOLIO – MSP MODERATE  
MULTI-STRATEGY PORTFOLIO – MSP BALANCED  
MULTI-STRATEGY PORTFOLIO – MSP ACTIVE  
MULTI-STRATEGY PORTFOLIO – MSP DYNAMIC  
MULTI-STRATEGY PORTFOLIO – MSP PURE EQUITY

The above mentioned changes will enter into force as of 17<sup>th</sup> September 2018 and will be implemented in a new version of the prospectus dated September 2018 .

In Belgium the financial representative is ING Belgium, where the periodic reports are available free of charge. The Prospectus and the KIIDs are also available free of charge in English, French and Dutch at the domicile of the UCITS, on [www.ing-isim.lu](http://www.ing-isim.lu) or in the branches of ING Belgium SA.

Luxembourg, 4<sup>th</sup> September 2018

The board of directors of the Fund