

Prepared by:
Compliance & AML
Eurizon Asset Management Slovakia, správ. spol., a.s.
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1. Introduction

This document is designed for investors and unit-holders¹ in relation to their investment in the mutual funds of Eurizon Asset Management Slovakia, správ. spol., a.s. (hereinafter „Eurizon SK“) with the aim to provide them with essential information about the protection of personal data (hereinafter „PD“), which shall mean information allowing to identify them as individual natural persons (hereinafter the „Data Subjects“).

This document explains the fundamental rules stemming from the General Data Protection Regulation (hereinafter „GDPR“).² In no way does it represent a marketing document, nor any other form of promotion of mutual funds. For more transparency and legibility, this document refers to Eurizon SK as „we“ and to the Data Subjects as „you“ in all grammatical forms.

2. Who is responsible for the processing of PD

Within the processing of PD, we act as Controller, which, either alone or jointly with other persons, determines the purposes and means of the processing of PD. Therefore, we are responsible for meeting the principles related to the processing of PD as defined by GDPR. Within our organisation chart, we have designated a specific responsible person (Data Protection Officer), whose role is, inter alia, to provide internal advice on the processing of PD and to monitor the alignment of our processes to GDPR.

Contact details of the Controller:

Eurizon Asset Management Slovakia, správ. spol., a.s.

Mlynské nivy 1

820 04 Bratislava, Slovakia

Contact form: www.eurizoncapital.com/sk, section titled „Kontakty“

Tel.: 0850 123 00 („KONTAKT“ service)

Contact details of the responsible person:

Eurizon Asset Management Slovakia, správ. spol., a.s.

Attn.: Data Protection Officer

Mlynské nivy 1

820 04 Bratislava, Slovakia

E-mail: compliance@eurizonslovakia.com

Tel.: +421 (2) 5055 2839 (Secretariat)

3. What sources, purposes and PD do we use

We process PD, which we acquire from you within the applications (requests) for transactions in unit certificates of our mutual funds. The given PD are primarily intended for concluding trades with you, for their execution, including their financial and physical settlement, and for subsequent controls in line with the legislation on collective investment.³ The applications are acquired from you and transmitted to us by VÚB, a.s. in its capacity as Distributor of unit certificates of

¹ Including, as the case may be, their deputies/representatives and ultimate beneficial owners.

² Regulation (EU) 2016/679.

³ Art. 6(1)(c) of GDPR in connection to Art. 55 and Art. 162 of Act No. 203/2011 Coll., as amended.

our mutual funds.⁴ The concerned PD include: title; name; surname; birth certificate number; ID type; ID number; citizenship; permanent residence address; correspondence address. Other data necessary for keeping the database and connected transactions, are added to these PD: internal identifiers; classification into categories; data on opening the business relationship, PD changes and archiving; parameters for determining tax obligations; relevant fact related to the business relationship, etc.

From VÚB, a.s. we acquire other DP, which are generated by internal and external public and non-public systems and databases and which are necessary in particular for fulfilling the legal obligations in the area of protection against money laundering and protection against terrorist financing (hereinafter “AML”)⁵ as well as automatic exchange of information about financial accounts for tax administration (hereinafter “FATCA/CRS”)⁶. For these purposes, we have appointed VÚB, a.s. to process PD on our behalf. The concerned DP include: AML risk profile; data on the physical presence when the product is established; classification into the category of a politically exposed person; data to determine the reporting obligations towards the Financial Directorate of the Slovak Republic.

4. Who else receives PD

We share PD acquired from you, after further processing, with VÚB, a.s., so that the latter could provide you with after-sales services, in particular so that VÚB, a.s. could send you a confirmation about your order being executed, a statement about changes on your securities account and a regular statement on your securities account. VÚB, a.s. and we cooperate with the parent company Intesa Sanpaolo S.p.A., which ensures particular data services, including the processing of PD. We archive your paper applications related to unit certificates, including PD, in the company Dokument Logistik, s.r.o. specialised in providing professional record-keeping services. Specific PD are also processed by our supplier in the field of mutual fund accounting - BDO Services, spol. s r. o. and potentially also by our supplier of professional services, maintenance and support in connection to our IT system - Goldmann Systems, a.s. We have appointed all of the above entities for processing PD on our behalf.

Your PD may be acquired by other recipients or third parties in line with the applicable legislation. This happens especially with the department of VÚB, a.s. playing the role of Depositary for all our mutual funds, the Unit for Supervision over the Financial Market of the National Bank of Slovakia, notaries acting in inheritance proceedings, specialised units of the Police and the Financial Directorate of the Slovak Republic.

The enumeration of processors (entities, which we have appointed for PD processing on our behalf), recipients and third parties is also set out in the annex to the prospectus of each of our mutual funds.

5. How long do we keep PD

It should be noted that, given the nature of investing in mutual funds and the recommended investment horizon, the business relationship between you and us may take several years. We process PD throughout the entire duration of the business relationship and subsequently as long as required by individual legal regulations covering our activities. Specifically, we are obliged to store or otherwise process PD as follows:

- at least 10 years after the end of the trade, when it comes to the identification data or copies of identity proofs related to investors and clients and proofs of investigating the ownership of the funds used by investors and clients for carrying out a trade;
- within 5 years from the end of the contractual relationship with the client, as for the data and written documents acquired during the customer due diligence and suspicious transaction monitoring, and within 5 years from the execution of a transaction as well as all data and written documents about the client;
- 10 years after the end of the calendar year in which a report was filed with the Financial Directorate of the Slovak Republic, including the documents supporting the report.

⁴ VÚB, a.s. processes PD based on, inter alia, Art. 73a and Art. 134 of Act No. 566/2001 Coll., as amended.

⁵ Art. 6(1)(c) of GDPR in connection with Art. 19 of Act No. 297/2008 Coll., as amended.

⁶ Art. 6(1)(c) of GDPR in connection with Art. 19 of Act No. 359/2015 Coll., as amended.

6. What are your rights connected to PD

In relation to processing your PD, you enjoy several rights:⁷

- right of access to PD, i.e. you may request a confirmation as to whether we process your PD and, if so, you have the right to access that PD in the form of statement with certain additional information;
- right to rectification of your incorrect PD or completion of your incomplete PD without undue delay;
- right to erasure of PD (right „to be forgotten“) without undue delay, but only in specific cases, typically if there is unlawful processing of PD or when you withdraw your consent with the processing of PD;
- right to restriction of the processing of PD in specific cases, e.g. you question the accuracy of PD, you object to the processing of PD via automated decision-making or you are against the erasure of PD, because you need them for an ongoing legal dispute;
- right to data portability, which means you may obtain back PD, which you provided, in a structured, commonly used and machine-readable format and, as the case may be, you may wish that PD be directly transmitted to another Controller;
- right to object to the processing of PD based on public or legitimate interests as well as for direct marketing purposes (sending of personalised offers), including profiling during such processing;
- right not to be subject to a decision based solely on automated processing of PD, including profiling, which would produce legal effects for you;
- right to complain to the Slovak Office for Personal Data Protection regarding the processing of PD.

7. Why you shall provide PD

The provision/acquisition of DP results from the legal requirements in the area of collective investment. Without PD, which you provide in the application related to unit certificates, we cannot execute the required transaction, especially due to the statutory method for keeping securities accounts and due to the need to identify owners of unit certificates. In particular, we must refuse anonymous trades or trades without investigating the ownership of the funds used.

The AML and FATCA/CRS legislation requires financial institutions to process other PD, which you are required to provide. Failure to do so may result in us being obliged to refuse to enter into a business relationship, to terminate a business relationship or to refuse to execute a particular trade or to file a report with the competent authority. The acquisition of these PD in the form of questionnaires, statements and other documents and the subsequent processing of DP is performed for us by VÚB, a.s.

8. When do we use automated decision-making, including profiling

We strive to minimise processes based solely on automated decision-making, including profiling, which would have legal consequences for you, unless the requirement for these processes arises from the legislation of EU or the Slovak Republic.

Currently we do not perform automated decision making and profiling.

⁷ Art. 15 et seq. of GDPR.