

Appendix Data protection

The contractual partner is informed that personal data will be processed to the extent necessary for the execution of the contract. This may involve fully or partially automated processing or non-automated processing of data to be stored in a file system.

Personal data means according to article 4 Nr.1 General Data Protection Regulation (GDPR) any information relating to an identified or identifiable natural person (data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing means according to article 4 Nr.2 GDPR any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaption or alteration, retrieval, consultation, use disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Filing system means according to article 4 Nr.6 GDPR any structured set of personal data which is accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis.

Union Investment Financial Services S.A. is controller of the processing of personal data.

Controller means according to article 4 Nr.7 GDPR the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

Union Investment Financial Services S.A. processes personal data which it has received from the contracting partner or which has been obtained from publicly accessible sources (e.g. trade and association register, press, media, Internet) in a permissible manner.

The contractual partner is also advised that personal data is being exchanged within the Union Investment Group.

Personal data will not be transferred to a country outside the EU.

Pursuant to Article 6 para. 1 c GDPR, the processing of personal data may be carried out on the basis of statutory provisions. The legal basis is the Luxembourg law of 12 November 2004 on combating money laundering and terrorist financing (in its currently applicable version). Personal data may therefore only be processed on this basis to prevent money laundering and terrorist financing.

The duration of the storage of personal data is also governed by the Luxembourg law of 12 November 2004 (in its currently applicable version) and may extend beyond the termination of the business relationship.

The confidentiality, protection and security of personal data is ensured by Union Investment Financial Services S.A. and there are physical and electronic safeguards and procedural safeguards in place to protect personal data.

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Generally, Union Investment Financial Services S.A. will not pass on personal data to external companies, organisations or persons, unless this is necessary in the ordinary course of business or is permitted or prescribed by law, or is done at the request of a supervisory authority.

The persons whose personal data are processed have the right to information, as well as to correction and deletion or to restriction of processing or a right of objection to processing as well as the right to data transfer.

Any input or requests must be addressed to:

Union Investment Financial Services S.A.

Att: Data protection officer

308, route d'Esch

L-1471 Luxembourg

datenschutz@union-investment.lu

Furthermore, the persons whose personal data are processed have the right to appeal to the competent supervisory authority, the Luxembourg Commission nationale pour la protection des données (CNPD), 1, avenue du Rock'n'Roll, L-4361 Esch-sur-Alzette, Tel.: (+352) 26 10 60-1.