

## General Privacy Notice

This privacy notice ("notice") applies to certain companies within the Fineco Asset Management group.

Fineco Asset Management is committed to protecting the privacy and security of your personal information.

This notice describes how Fineco Asset Management collects and uses personal information about you in accordance with the General Data Protection Regulation or other equivalent or implementing legislation in the jurisdiction of the relevant Fineco Asset Management entity ("data protection law").

If you are a candidate or an employee of Fineco Asset Management, please also see our Employee/Candidate Privacy Notice for further information.

### What is the purpose of this document?

Fineco Asset Management acts as "data controller", meaning that we are responsible for deciding how we collect, hold, use and process personal information about you. We are required under data protection law to notify you of the information contained in this privacy notice.

It is important that you read and retain this notice, together with any other documentation we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the applicable data protection law.

### Data protection principles

We will comply with data protection law. This requires that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

### The kind of information we hold about you

In connection with your use of our website and we will collect, store, and use the following personal information about you:

- Any information you provide to us in your initial enquiry and/or complaint submission; and

- Any information that you subsequently provide in the course of receiving fund and/or marketing materials from us or, if relevant, in the course of us dealing with your complaint.

This may include, without limitation, your name, title, address, telephone number, bank account details, personal/work email address, date of birth, gender, marital status and dependents, next of kin, etc.

#### **How is your personal information collected?**

Your personal information will be typically collected by us through your use of the Fineco Asset Management website and subsequently through email, letter and/or telephone correspondence.

#### **How we will use information about you**

We will only use your personal information in a manner compatible with the data protection law. Most commonly, we will use your personal information in the following circumstances:

To provide you with relevant information and/or fund and/or marketing communications in response to your enquiries and/or requests.

If you make a complaint, to deal with all aspects of the complaint throughout the course of our complaint management process.

To provide knowledge, insight, and information that we think is of importance, interest, or relevance to you.

If you are a candidate or an employee of Fineco Asset Management, please also see the FAM Employee/Candidate Privacy Notice for further information.

#### **If you fail to provide personal information**

If you fail to provide certain information when requested, we may not be able to provide you with services or information, or we may be prevented from complying with our legal obligations.

#### **Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

#### **Data sharing and transfer outside of the EEA**

We may have to share your data with third parties, including third-party service providers and other entities inside and outside of the Fineco Asset Management group including our parent company,

FinecoBank. We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, we will ensure a similar degree of protection be applied in respect of your personal information.

### **Data retention**

#### **How long will you use my information for?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

### **Rights of access, correction, erasure, and restriction**

#### **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

#### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Human Resources department in writing

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

**What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

**Right to withdraw consent**

You have the right to withdraw your consent for to the collection, processing and transfer of your personal information at any time. To withdraw your consent, please contact HR. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

**Changes to this Privacy Notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.