

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.

Employee/Candidate Privacy Notice

This employee/candidate 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 before, during and after your working relationship with us, 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”).

It applies to all employees, workers, contractors and applicants.

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. You are being sent a copy of this privacy notice because you are working for or applying for work with us (whether as an employee, worker or contractor). We are required under data protection law to notify you of the information contained in this privacy notice.

This notice applies to prospective, current and former employees, workers and contractors. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably practical.

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 application for work with us and any subsequent employment, we will collect, store, and use the following categories of personal information about you:

- Any information you have provided to us in your curriculum vitae and covering letter.
- Any information you have provided in the course of the recruitment or induction process or otherwise including right to work documentation, references, name, title, address, telephone number, bank account details, personal email address, date of birth, gender, marital status and dependents, next of kin, employment history, qualifications etc.
- Any information you provide to us during an interview, including the results of any psychometric testing.
- Salary, annual leave, pension and benefits information.
- Employment records (including job titles, work history, working hours, holidays, training records and professional memberships).
- Any information provided under a pre-employment health assessment used to determine the applicant's medical fitness for work.
- Performance information.
- Disciplinary and grievance information.
- Leaving date and your reason for leaving.
- CCTV footage and other information obtained through electronic means such as photographs and swipe card records.
- Information about your use of our information and communications systems.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your health, including any medical condition, health and sickness records including:
 - o Details of any medical condition requiring special facilities, services or other arrangements for health and safety purposes be made available to you;
 - o Details of any absences (other than holidays) from work including time on statutory parental leave and sick leave; and
 - o where you leave employment and the reason for leaving is related to your health, information about that condition needed for pensions and permanent health insurance purposes
- Information about criminal convictions and offences.

How is your personal information collected?

Fineco Asset Management collects personal information about employees, workers and contractors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or other provider. We may sometimes collect additional information from third parties including former employers, referees, or other agencies.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

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:

1. Where we need to perform our salary payment and other contractual obligations under the contract of employment we have entered into with or in respect of you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.

Situations in which we will use your personal information

We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own, provided your interests and fundamental rights do not override those interests. We may use third party agencies to carry out certain services in connection with your employment and your personal information will be transferred to such third parties where required to complete the service. We will process the personal information we collect about you for:

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the jurisdiction.
- Paying you and, if you are an employee or deemed employee for tax purposes, making tax deductions.
- Providing benefits to you.
- Enrolling you in a pension arrangement in accordance with our enrolment procedures.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary hearings.
- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our working relationship.
- Education, training and development requirements.

- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Ascertaining your fitness to work.
- Managing sickness absence.
- Complying with health and safety obligations.
- To prevent fraud.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- Equal opportunities monitoring.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered or intend to enter into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

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. 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.

Once you are no longer an employee, worker or contractor of Fineco Asset Management we will securely destroy your personal information in accordance with data protection laws.

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. Please note the implications of withdrawing consent may require us to terminate our employment

or engagement with you, where we are unable to process your information in order to carry out our contractual obligations under the contract.

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.