



## NOTICE ON PERSONAL DATA PROCESSING

The mutual fund management societe anonyme **PIRAEUS ASSET MANAGEMENT M.F.M.C**, headquartered in Athens (94 Vasilissis Sofias Avenue & 1 Kerasountos Street), with TIN: 999081601, Athens Tax Office for Taxation of Societes Anonymes, GCR 6314201000, as **Data Controller**, (hereinafter referred to as “**M.F.M.C.**”), in the context of its compliance with the provisions of the General Data Protection Regulation (EU) 2016/679 (hereinafter referred to as “GDPR”) and Law 4624/2019, provides by this form a notice on the processing of personal data of its customers and on their rights as subjects of such processing.

**Lawfulness of Processing:** PIRAEUS ASSET MANAGEMENT M.F.M.C. shall process personal data of its customers in the following cases, according to those specified in the applicable legislation and under the terms and conditions stipulated thereby:

1. If the processing is necessary for the service, support and follow-up of its trading relationships with its customers, as well as for the appropriate and lawful performance of the agreements between them. Processing considered necessary in order to take steps at the request of the customer prior to the conclusion of the agreement (pre-contractual stage) shall also be included in this case,
2. If processing is necessary for the compliance of M.F.M.C. with its legal obligation or for pursuing its legitimate interests arising from its trading relationships with the customer or from other rights thereof arising from the applicable legislation,
3. If processing is necessary for the performance of a task carried out in the public interest, according to the applicable legislative and regulatory framework\* from time to time,
4. If processing is necessary for the establishment, exercise or defense of legal claims,
5. If the customer has consented, providing a specific, explicit and written consent, to the processing of their personal data for one or more purposes and under the condition that the processing is not founded on one of the aforementioned legal bases under 1 – 4. In this case, the customer shall be entitled to withdraw their consent at any time and such withdrawal shall not affect the lawfulness of processing based on consent before its withdrawal. The withdrawal shall be made by a respective document submitted in writing or electronically to PIRAEUS ASSET MANAGEMENT M.F.M.C. (addressed to the Data Protection Officer) and shall take effect from the date of its submission onwards.

\*It is noted that personal data are subject to processing by M.F.M.C. also according to the provisions of Law 4557/2018 with the purpose of preventing and combating money laundering and terrorist financing. In this context, personal data may be transferred to the competent authorities supervising the implementation of the above provisions, as well as to other public authorities entrusted with tasks for combating money laundering and terrorist financing. The processing of personal data for the aforementioned purpose shall be considered as a matter of public interest.

**Data processing:** The processing of personal data of the customers of PIRAEUS ASSET MANAGEMENT M.F.M.C. shall consist of the collection, recording, organization, structuring, storage, alteration, retrieval, consultation, use, transmission, restriction or erasure of their personal data, of which PIRAEUS ASSET MANAGEMENT M.F.M.C. has taken notice or shall take notice, both within its trading relationships with the customers and within the information received by M.F.M.C. by third, natural or legal, persons or entities of the public sector, in the exercise of the legal rights of the same or of the M.F.M.C..



**Processed data:** PIRAEUS ASSET MANAGEMENT M.F.M.C. shall process the personal data of its customers, which:

- i) have been submitted or will be submitted by its customers or by legal representatives thereof, which are necessary for the commencement, maintenance and performance of their trading relationships with M.F.M.C., existing or future ones,
- ii) receives or takes notice thereof by third, natural or legal, persons or public entities, if they are necessary either for the achievement of legitimate interests of M.F.M.C. itself or a third party, or for the fulfillment of tasks performed to ensure a public interest,
- iii) come from publicly accessible sources and/or archives, to the extent and insofar as they are necessary for the purposes of processing.

Personal data provided by customers must be complete and accurate and updated under the responsibility of the customers, promptly in each case of change thereof or at such other time it is considered necessary or appropriate by M.F.M.C. for the maintenance of the trading relationships between them or for the compliance of M.F.M.C. with its obligations arising from the applicable legislative and regulatory framework from time to time.

For the commencement and maintenance of its trading relationship with its customers, PIRAEUS ASSET MANAGEMENT M.F.M.C., in compliance with the applicable legislative and regulatory framework governing the mutual fund management companies which, at the same time, also provide investment services (M.F.M.C. of extended purpose), shall collect, keep and process the following personal data of its customers: Full name, father's name, details of identity card/passport or of another official identification document, date of birth, nationality, permanent place of residence, residence address and correspondence address, pursued occupation and professional address, tax residence, tax identification number (TIN) and competent Tax Office, telephone number (fixed-line and mobile), utilities bills (of electricity, telephony or water supply), e-mail address, economic/investment profile, knowledge and experience in investments and sample of signature (physical or electronic).

**Children's data:** Processing of personal data concerning minors shall be performed under the strict condition of previous consent of the parents or holders of parental responsibility over them, according to those specified in the applicable legislation from time to time.

**Special categories of data:** PIRAEUS ASSET MANAGEMENT M.F.M.C shall not process personal data of its customers revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, nor genetic or biometric data for the purpose of uniquely identifying the customer or data concerning health or data concerning the customer's sex life or their sexual orientation.

**Purposes of processing:** Purposes of processing of personal data of the customers of M.F.M.C. are:

- a) service, support and follow-up of the participation of unitholders in the UCITS managed and/or represented by PIRAEUS ASSET MANAGEMENT M.F.M.C., based on the applications for participation, redemption and redemption-reinvestment in UCITS under the management/representation of M.F.M.C. submitted by the customers,
- b) service, support and follow-up of the trading relationships of PIRAEUS ASSET MANAGEMENT M.F.M.C. with customers, to whom it provides services of portfolio management and/or investment consultancy, as well as the appropriate and lawful performance of the agreements between them,
- c) registration, recording and archiving of all kinds of orders, applications and requests of customers to



PIRAEUS ASSET MANAGEMENT M.F.M.C., which are given in writing, electronically or by phone, in the context of their participation in UCITS managed and/or represented by PIRAEUS ASSET MANAGEMENT M.F.M.C. or the provision of investment services to them by M.F.M.C.,

d) in the context of management and/or representation of UCITS and provision of investment services, fulfillment of obligations of PIRAEUS ASSET MANAGEMENT M.F.M.C. arising from the applicable legislative and regulatory framework from time to time, as well as compliance thereof with the decisions of the competent supervisory, administrative and judicial/prosecutorial Authorities and Services,

e) satisfaction of all kinds of requests of customers addressed to M.F.M.C. or the examination of customers' complaints and

f) sending print and electronic messages from the Company to the customers for advertising/promotional reasons, if they have provided a previous special consent for that to the Company.

**Storage and duration of retention:** The personal data of the customers of M.F.M.C. shall be processed, kept and stored by PIRAEUS ASSET MANAGEMENT M.F.M.C. in a safe environment, exclusively and solely for the purposes for which they are intended and only for the period required for the fulfilment of such purposes, subject to those specified by the applicable legislation. In any case, the personal data of the customers shall be kept for a period of twenty (20) years from the termination in any way of the contractual relationship between M.F.M.C. and the customer or the entire redemption by the customer of all units of UCITS under management and/or representation, as applicable. The above time limits shall not apply in case of litigation, where the provided period of data retention shall be extended until the adoption of irrevocable judgement.

**Recipients:** Recipients of the personal data of customers of M.F.M.C. may be:

i) any credit institution, which acts as custodian/sub-custodian of the UCITS under the management and/or representation of M.F.M.C., the relevant appointed mediators/sub-mediators for the disposal of units of the UCITS under the management and/or representation of M.F.M.C, as well as third persons-providers, to whom PIRAEUS ASSET MANAGEMENT M.F.M.C. has assigned, pursuant to a respective agreement, the execution of operations thereof, within the context of management/representation of UCITS and the provision of investment services,

ii) third persons, to whom PIRAEUS ASSET MANAGEMENT M.F.M.C. has assigned, in total or in part, the performance of operations of personal data processing on its behalf, for the optimum service of UCITS management and representation and provision of investment services to customers, as well as of its compliance with the applicable legislative and regulatory framework, from time to time,

iii) third persons, with whom PIRAEUS ASSET MANAGEMENT M.F.M.C. cooperates in the pursue of its activities, with the purpose of fulfilling its obligations in the context of UCITS management and representation and provision of investment services to customers,

iv) UCITS management companies represented by PIRAEUS ASSET MANAGEMENT M.F.M.C., their custodians, as well as any person, to whom the management companies and custodies of UCITS under the representation of M.F.M.C. have assigned, pursuant to a relevant agreement, the performance of operations thereof, in the context of management/custody of such UCITS, including the performance of operation of processing of personal data of customers on behalf of them,

v) all undertakings of Piraeus Bank Group, to the extent and insofar as the respective transfer serves the participation of unitholders in UCITS managed or represented by M.F.M.C. or the provision of investment services from M.F.M.C. to its customers,

vi) any person, to whom transfer must be made, pursuant to the applicable legislative and regulatory framework or based on a court judgement

vi) the competent supervisory authorities for the control and operation of both the UCITS managed



and/or represented by PIRAEUS ASSET MANAGEMENT M.F.M.C. and M.F.M.C. itself, as well as any public, administrative, supervisory, judicial, prosecutorial or other Authority and/or Service, in the exercise of its legal duties.

**Processors:** PIRAEUS ASSET MANAGEMENT M.F.M.C. has lawfully ensured that the processors of personal data of its customers on its behalf fulfill the conditions arising from the applicable legislation and provide sufficient guarantees to implement appropriate technical and organizational measures, so that the rights of its customers are protected during the processing of their personal data by them.

**Transfer of personal data to third countries/international organization:** The transfer of personal data to a third country or international organization may be made only if an adequate level of protection by the third country or international organization is ensured. Otherwise, the Company may transfer personal data to a third country or international organization, only under the conditions strictly provided for in the GDPR.

**Rights of customers as subjects:** The customers of PIRAEUS ASSET MANAGEMENT M.F.M.C., as subjects of their personal data processing, have the following rights:

- a) Right of information and access to personal data concerning them and receipt of information thereon, as well as on their origin, purposes of processing, recipients or categories of recipients and duration of their storage\*.
- b) Right to rectification of inaccurate data and completion of incomplete data kept.
- c) Right to erasure of data, subject, however, to the obligations and legal rights of M.F.M.C. on their retention for a minimum specific period, pursuant to the applicable legislative and regulatory framework.
- d) Right to restriction of processing of data if their accuracy is contested, or their processing is unlawful, or they are not needed anymore for the purpose of processing and under the condition that no legal reason exists for their retention.
- e) Right to data portability to another controller, under the condition that the processing is based on the consent of the customer and carried out by automated means. The satisfaction of such right is subject to the legal rights and obligations of M.F.M.C. on retention of data and performance of a task in the public interest.
- f) Right to object to data processing concerning them, on grounds related to their particular situation, in the cases where data are processed for the performance of a task in the public interest or for the purposes of legitimate interests pursued by M.F.M.C. or a third party.

In addition, the data subject has the right to lodge a complaint before the Hellenic Data Protection Authority (1-3 Kifissias Avenue, Athens/[contact@dpa.gr](mailto:contact@dpa.gr)) for any issue related to their personal data.

*\*It is noted that the satisfaction of such right is subject to the legal obligation of M.F.M.C. on prohibition of notification of details and information in the case of Article 27 of Law 4557/2018 in the context of prevention, investigation and detection of any money laundering and terrorist financing.*



**Security:** PIRAEUS ASSET MANAGEMENT M.F.M.C. has taken appropriate technical and organizational measures for ensuring privacy and for the lawful retention, processing, protection and secure storage of the personal data of its customers, from any unlawful or unfair processing, accidental or unfair destruction, loss, alteration, prohibited dissemination or access, according to those specified in the applicable legislation.

**Customer Data Protection Policy:** PIRAEUS ASSET MANAGEMENT M.F.M.C. has adopted and implements a customer Personal Data Protection Policy, which is available, as in force from time to time, on its website [www.piraeusaedak.gr](http://www.piraeusaedak.gr), as well as at the offices of M.F.M.C. (94 Vasilissis Sofias Avenue & 1 Kerasountos Street, Athens) free of charge. The above Policy is subject to unilateral amendment by M.F.M.C., at its exclusive discretion, and its updated version shall be posted immediately on the above website.

**Data Protection Officer:** PIRAEUS ASSET MANAGEMENT M.F.M.C. has appointed a Data Protection Officer, whose contact details are: [DPO\\_aedak@piraeusbank.gr](mailto:DPO_aedak@piraeusbank.gr)

The requests of the customers of M.F.M.C. with regard to their personal data and the exercise of their rights shall be submitted to the Data Protection Officer of M.F.M.C. at the e-mail address [DPO\\_aedak@piraeusbank.gr](mailto:DPO_aedak@piraeusbank.gr) or in writing to the offices of M.F.M.C. (94 Vasilissis Sofias Avenue and 1 Kerasountos Street, Athens) to the attention of the Data Protection Officer.

The customers in any case maintain the right to refer at any time to the Hellenic Data Protection Authority, (1-3 Kifissias Avenue, Athens /[contact@dpa.gr](mailto:contact@dpa.gr)).