

Personal data are processed by the European Investment Fund (“EIF” or “**Controller**”) in accordance with Regulation (EU) 2018/1725 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, as such regulation may be amended from time to time.

1. Legal Basis

The legal basis are the 5th and 6th AML Directive¹ requirements.

2. Data Subjects

Personal data may be processed in relation to:

- EIF financial intermediaries and related key persons;
- EIF mandators and related key persons;
- EIF external service providers;
- EIF employees.

3. Purpose

In light of the Customer Due Diligence Process and Monitoring, EIF collects natural persons’ data, which are subject to an ongoing compliance screening against adverse media hits, Politically Exposed Persons (“PEP”) and Sanctions lists. Hence, the natural persons’ data are used to confirm the hits that resulted from the screening process.

Alongside EIF, an external service provider based in the United Kingdom also processes the natural persons’ data as it provides screening services against the adverse media, PEP and Sanctions lists. Such reviews may be completed by publicly (media) available information.

4. Data Categories

The personal data are stored in the EIF systems and includes name, ID number, ID or Passport copy, date and country of birth, nationality, tax domicile address, bank account numbers, phone and mobile numbers and email. Natural persons’ personal data may be obtained during the on-boarding and monitoring processes or through publicly available data sources.

5. Data Recipients

The aforementioned personal data will be processed only by the EIF relevant services and may also be shared with the European Investment Bank in case of a common counterparty in line with the Addendum to the Convention between the European Investment Bank and the EIF on the exchange of information and documents of 14 April 2020, or with other mandators (e.g. European Commission) under relevant audits and controls as well as externally with service providers e.g. in the case of the EIF Fund-of-Fund Advisory activities.

¹ 5th AMLD (Directive (EU) 2018/843 of the European Parliament and of the Council of 30 May 2018 amending Directive (EU) 2015/849) and 6th AMLD (Directive (EU) 2018/1673 of the European Parliament and of the Council of 23 October 2018 on combating money laundering by criminal law)

6. Data Retention Period

Any personal data collected and processed in the context herein will be retained by the EIF, as the case may be, for a maximum period of 5 years as from the date of the termination of the business relationship with the financial intermediary or the rejection of the application. However, if there is a Money Laundering and/or Terrorism Financing (“ML/FT”) concern, that can be extended by 5 years.

7. Rights of Data Subject

- Data Subjects have the right to obtain from the controller confirmation as to whether or not their personal data concerning are being processed, and, where that is the case, access their personal data by contacting the Controller (info@eif.org) or through the EIF DPO (dpo@eif.org) and they will receive a response without undue delay (**right of access**);
- Data Subjects have the right to obtain from the controller without undue delay the rectification of any inaccurate personal data concerning them (**right to rectification**).
- Data Subjects have the right to obtain from the controller the erasure of their personal data when they are no longer necessary in relation to the purposes for which they were collected (**right to erasure**);
- Data Subjects have the right to obtain from the controller restriction of processing when (i) they contest the accuracy of their personal data, (ii) the processing is unlawful, (iii) the controller no longer needs the personal data for the purposes of the processing or (iv) they have objected to processing, pending the verification whether the legitimate grounds of the controller override theirs (**right to restriction of processing**);
- Data Subjects have the **right to object**, on grounds relating to their particular situation, when the processing of personal data is unlawful;
- Data Subjects have the right to receive from the controller their personal data in a structured, commonly used and machine-readable format and transmit those data to another controller without hindrance from the controller to which the personal data have been provided (**right to data portability**);
- Data Subjects may lodge a complaint to the European Data Protection Supervisor (www.edps.europa.eu) at any time (**right to lodge a complaint**).