

EUROPEAN INVESTMENT FUND - Data Protection Statement – ANNUAL COMPLIANCE DECLARATION

1. Controller

This data protection statement provides information regarding the purpose of the processing carried out by EIF Compliance which is the responsible controller inside the EIF, indicate as stated in the record] of the European Investment Fund hereafter, hereafter the “EIF” or “we” in the course of this processing activity.

In the course of this activity the processing of personal data does not involve the existence of automated decision-making, including profiling.

This privacy statement provides information regarding the processing of personal data carried out by the EIF in the course of raising the EIF staff members’ awareness on the importance of the ethical and professional standards and internal rules enshrined the EIB Group Staff Code of Conduct (the “CoC”), the EIB Group Market Abuse Policy (the “MAP”)/and the EIB Group Anti-Fraud Policy (the “AFP”). It describes how the EIF, in the course of those activities, processes personal data relating to EIF staff members in service and having to report for the activity carried out within the EIF between January – December of the previous year to submitting the declaration.

2. Purpose of the processing

This data protection statement provides information regarding the purpose of the processing carried out by the EIF in the course of this processing activity. The EIF performs tasks in the exercise of the authority vested to it in accordance with its Statute.

The EIF processes your personal data as reasonably necessary so that it can conduct and manage this processing activity in a reasonable and proper manner. Specifically, we process your personal data for the following purposes:

- Monitor staff members’ compliance with the ethical and professional standards and internal rules enshrined in the CoC, the MAP and the AFP.
- Draw the EIF staff members’ attention to the consequences that the breach of the previously mentioned documents may entail.

3. Legal Basis of the processing

Personal data are processed by the EIF in accordance with Regulation (EU) 2018/1725 of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC. The EIF staff members within the scope of the current declaration are required to take the time to read the CoC, the MAP and the AFP, to pay attention to their content, which sets out the duty of staff members to adhere to the highest ethical and professional standards and conduct and to duly fill in the form until the specified deadline. All of this processing is necessary so that the EIF can carry out its tasks in the public interest in the course of disclosure of information in relation to the EIF staff members’ declaration concerning adherence to the CoC, private investments and prohibited conduct as per the MAP and the AFP and, potentially, furthermore, to conflicts of interest, outside professional activities and gifts, favours and benefits

4. Categories of data subjects

EIF Staff and Pensioners.

5. What personal data do we process?

We collect and process identification data (first name, surname), professional data (function held within the EIF) and data in relation to adherence to the CoC, private investments and prohibited conduct as per the MAP and the AFP. Furthermore, it is possible to collect and process data regarding personal conflicts of interest, outside professional activities and gifts, favours and benefits.

6. Where do we obtain your personal data?

All the data will be obtained directly from data subject.

7. To whom is your data disclosed?

We may disclose personal data about you:

- Internally, to the EIF relevant services and/or EIF governing and controlling bodies,
- To our legal advisors,
- To the legal entity, organisation (if any) with which you are associated,
- To the European Investment Bank and other EU institutions (including the European Commission, and the European Court of Auditors, OLAF),
- To the public authorities in the EU Member States, and competent regulatory, prosecuting and tax authorities.

8. International Transfers

Not applicable.

9. How long do we keep your personal data?

We keep your data for maximum of 10 years starting from the submission of the Declaration or the targeted communications sent to EIF Compliance, and, if the Declaration is part of the modification of a different declaration / case documentation, according to specific time limits applicable.

10. What are your rights and how can you exercise them?

Your rights are set out in sections 3 to 5 of the EU DPR.

- You have the right to obtain from the controller confirmation as to whether or not your personal data are being processed, and, if so, to access your personal data by contacting the Controller or through the EIF DPO (**right of access**);
- You have the right to request the controller to rectify any inaccurate data and/or have incomplete personal data completed (**right for rectification**);
- You have the right to request the controller to erase your personal data as per Article 19 of the EU DPR (**right to be forgotten**);
- You have the right to request the controller to restrict the processing of your personal data in the following cases (**right to restriction of processing**):
 - (i) if you contest the accuracy of your data;
 - (ii) if the processing of the data is unlawful and you oppose to their erasure;
 - (iii) if the controller no longer needs the personal data referred to for the purposes of the processing but you require them for the establishment, exercise or defence of legal claims; or

(iv) if you have objected to the processing of your data and EIF seeks to establish whether the controller has legitimate grounds overriding yours right to restriction.

- You have the right to **object** to the processing of personal data , on grounds relating to your particular situation, unless EIF demonstrates compelling legitimate grounds for the processing or for the establishment, exercise or defence of legal claims;
- You have the right to receive your personal data from the EIF in a structured, commonly used and machine-readable format to allow you to transmit your data to another controller without hindrance from the EIF (**right to data portability**);
- When the legal basis of the processing is the consent, data subject has the right to withdraw his/her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal;
- You have the right to lodge a complaint with the European Data Protection Supervisor (www.edps.europa.eu) at any time (right to lodge a complaint).

11. Contact us

If you have any questions about our processing of your personal data, or wish to exercise any of the rights described above, please contact us: EIF Corporate Compliance Team eifcorpcompl@eif.org or the EIF's Data Protection Officer, Mr. Paolo Sinibaldi, by email at dpo@eif.org or at the following address:

Mr. Paolo Sinibaldi

European Investment Fund

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