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 Directive\(^1\) 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**
EIF co-operates with the Luxembourgish Financial Intelligence Unit ("FIU") and as per Article 33 of the 5th AML Directive reports suspicious of Money Laundering and/or Financing of Terrorism ("ML/FT") offences to the FIU, using the goAML application platform.

There is a Memorandum of Understanding in place between the EIF and the Luxembourgish FIU, which allows the EIF to be able to share information on suspicious activities and, or transactions.

4. **Data Categories**
An SAR/STR may include the following details:
- Personal data (name, ID number or company registration number, ID or Passport copy, date of birth, address, email, telephone number, bank account number) of the person(s) or company(ies) involved in the suspicious transaction/activity;
- Details of the suspicious financial transaction/activity;
- The reason and risk factors why the transaction/activity is suspicious.

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.

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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 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).