

Last update: 25/04/2022

#### Data Protection Statement

## Sharing of fund managers' quarterly reports with the Service provider

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

Article 5(1)(a) of the Regulation, pursuant to which processing is necessary for the performance of a task carried out by the controller in the public interest. The outsourcing process is explained in procedures E.5.3. Equity - NAV and Portfolio input & validation.

# 2. Data Subjects

Fund manager's team and portfolio company employees.

# 3. <u>Purpose</u>

Fund managers' quarterly reports are shared with the service provider (Numen Europe) that has been engaged by EIF to provide data input services.

### 4. Data Categories

Contact details, key men event triggered by personal situation e.g. new CEOs appointed, names of portfolio company employees engaged in criminal activities etc.

### 5. Data Recipients

Service provider (Numen Europe)

### 6. <u>Transfers to third counties or International Organizations</u>

Numen Europe stores reports received from EIF in its own application. Such reports are available to Numen team, based in Madagascar, which performs data input. In addition, Numen Madagascar is following up with fund managers for missing reports. Standard Contractual Clauses have been set up with the Service Provider in order to cover the transfer of data to a third country as foreseen by article 16(1)(f) of EUDPR

## 7. Data Retention Period

OIM/DH/DI&V stores contact details (name and business email address) of people responsible for reporting in the management company. These personal data are stored for a maximum period of 20 years.

### 8. <u>Rights of Data Subject</u>

- 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).