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Data Protection Statement

Non-incorporated FoFs

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.

Legal Basis 1.

Art 5(1)a EUDPR " processing is necessary for the performance of a task carried out in the public interest"

2. **Data Subjects**

The management of the governing bodies involves multiple stakeholders: members of the governing bodies, EIF, the Service Provider, the Auditors, CSSF and any other stakeholder.

3. **Purpose**

The non-incorporated Fund-of-Funds ("FoF") structures have different governing bodies (Board of Directors ("BoD"), Investment Committee ("IC"), Advisory Boards ("AB"); composed of multiple members. The purpose of processing data is to ensure efficient communication of the governing bodies and the management of the FoF.

4. **Data Categories**

The management of the governing bodies involves multiple stakeholders: members of the governing bodies, EIF, Alter Domus (or any other Service Provider), Auditors, CSSF and any other stakeholder.

5. **Data Recipients**

Governing Body Member or other relevant stakeholders formally associated with the structure as members or as quest participants/contributors/observers

Including any other stakeholder who acts as a contact person for the management of the structure

6. **Data Retention Period**

Data subjects' personal data will be retained up to ten (10) years after the termination of each processing operation.

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 (<u>www.edps.europa.eu</u>) at any time (**right to lodge a complaint**).