

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 4th and 5th AML Directive¹ requirements.

2. **Data Subjects**

Personal data may be processed in relation to:

- financial intermediary and their shareholders; and
- Individuals (UBO and key persons), who are identified to be relevant for the proposed transaction.

3. **Purpose**

The EIF AML/CFT standards follow the EIB Group AML/CFT framework. EIF proceeds systematically to a detailed due diligence on the integrity of EIF counterparts. The level of due diligence depends on potential red flags identified during the on-boarding process of the proposed financial intermediary. The ML/FT risk attributed determines the frequency of the KYC periodic review of the financial intermediary (cf. EIF AML/CFT Procedures).

4. **Data Categories**

Personal data stored in the g:/drive and eFront data base are the name, ID number, company registration number, date of birth, address, phone number, bank account number of the key person(s) or company(ies) involved in EIF transactions.

5. **Data Recipients**

The personal data will be processed by all relevant front-to-back EIF service lines. For specific due-diligence or audit purposes, the aforementioned personal data may be shared with the respective EIB Group functions, as well as externally with service providers e.g. in the case of the EIF Fund-of-Fund Advisory activities.

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.

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**).

¹ 4th AMLD (DIRECTIVE (EU) 2015/849 of the European Parliament and of the Council of 20 May 2015) and 5th AMLD (Directive (EU) 2018/843 of the European Parliament and of the Council of 30 May 2018 amending Directive (EU) 2015/849)

- 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**).