

## Data Protection Statement

# EIF COMPLIANCE – Processing of Natural Persons’ data for on-boarding/monitoring purposes

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This document provides an insight into how EIF processes your personal data in the context of processing of natural persons’ data for on-boarding/monitoring purposes.

Your 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 5<sup>th</sup> and 6<sup>th</sup> AML Directive<sup>1</sup> requirements.

### 2. Data subjects

Personal data may be processed in relation to:

- EIF financial intermediaries and related key persons;
- EIF mandators/shareholders and related key persons;
- EIF external service providers.

### 3. Purpose

In light of the Customer Due Diligence Process, including the monitoring processes, EIF collects natural persons’ data, which are subject to ongoing compliance screening against adverse media integrity concerns, Politically Exposed Persons (“PEP”) and Sanctions lists. Hence, the natural persons’ data are used to confirm the potential Money Laundering and/or Terrorism Financing (“ML/FT”) red flags that resulted from the screening process.

Alongside EIF, an external service provider based in the United Kingdom also processes the natural persons’ data as it provides screening services against the adverse media, PEP and Sanctions lists. Such reviews may also be completed by publicly (media) available information.

In addition, before establishing a customer relationship, the outcome of the Preliminary Integrity Checks carried out by the EIF KYC Unit is reported to EIF Compliance. In presence of any ML/FT and/or tax integrity related red flags, Compliance shall carry out the detailed Integrity Risk assessment and establish the appropriate level of due diligence.

Throughout the life of a customer relationship, personal data are screened on a daily basis.

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<sup>1</sup> 5<sup>th</sup> AMLD (Directive (EU) 2018/843 of the European Parliament and of the Council of 30 May 2018 amending Directive (EU) 2015/849) and 6<sup>th</sup> AMLD (Directive (EU) 2018/1673 of the European Parliament and of the Council of 23 October 2018 on combating money laundering by criminal law)

#### 4. Data Categories

Personal data is stored in EIF systems and includes name, legal entity identifier, European VAT number, taxpayer identification number, entity bank account number, office address and legal jurisdiction of the counterparties involved in EIF transactions. In addition, concerning the counterparties' key persons, the personal data stored is the name, ID number, ID or Passport copy, date and country of birth, nationality, tax domicile, curriculum vitae and related data contained therein, personal bank account number, phone and mobile numbers and email of the counterparties involved in EIF transactions. The personal data may be obtained from the on-boarding and periodic review or through publicly available data sources.

#### 5. Data Recipients

The aforementioned personal data will be processed only by the EIF relevant services and may also be shared with the EIB in case of a common counterparty in line with the revised Convention between the EIB and the EIF on the exchange of information and documents of 9 March 2022, 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.

#### 6. Transfers to third countries or International Organizations

Personal data collected is, in principle, not disclosed to external parties with the exception of the service provider mentioned above.

#### 7. Data Retention Periods

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 any suspicion or actual predicate offence concerns, this period can be extended by 5 years.

#### 8. Your Rights as the Data Subject

- 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 and you will receive a response without undue delay (**right of access**);
- You have the right to obtain from the controller without undue delay the rectification of any inaccurate data and to have incomplete personal data completed (**right to rectification**);
- You have the right to obtain from the controller the erasure of your personal data when they are no longer necessary in relation to the purposes for which they were collected (**right to erasure**).
- You have the right to obtain from the controller restriction of 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;
  - (iii) if the EIF no longer needs the personal data referred to for the purposes of the processing; or

(iv) if you have objected to the processing of your data, pending the verification of whether the EIF has legitimate grounds overriding yours.

- You have the **right to object**, on grounds relating to your particular situation, when the processing of personal data is unlawful;
- 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 to which the personal data have been provided (**right to data portability**);
- To exercise your rights above, you may contact the Controller ([info@eif.org](mailto:info@eif.org)) or the EIF DPO ([dpo@eif.org](mailto:dpo@eif.org)).
- Furthermore, you may lodge a complaint with the European Data Protection Supervisor ([www.edps.europa.eu](http://www.edps.europa.eu)) at any time (**right to lodge a complaint**).