

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 4<sup>th</sup> and 5<sup>th</sup> AML directive<sup>1</sup> requirements.

2. **Data Subjects**

Personal data may be processed in relation to:

- financial intermediary and their shareholders; and
- Individuals (UBOs, key persons, Politically Exposed Persons and Business Angels)

3. **Purpose**

EIF applies Enhanced Due Diligence in case the Relevant Counterparties following the analysis of Preliminary Integrity Questionnaire information. Criteria such as jurisdiction, entity type, listing or level of regulation are taken into account when determining the level of due diligence applied. Until automated Screening Tool is fully implemented, EIF COMPL has defined an enhanced manual monitoring process for Politically Exposed Persons. The update of the register is performed based on the results of the Preliminary Integrity Checks and the ongoing monitoring via World Check and Google (if any relevant true hit is identified via World Check).

4. **Data Categories**

Personal data stored in the g:/drive within the BA and Natural Persons registers and eFront data base are the name, ID number, date of birth, address, phone number. Identification data can also be data related to offences, public criminal records, investigation and prosecution, business relationships. An assessment is performed on a yearly basis at least on publicly available sources (World Check and Google search) and public sanctions lists (OFAC, EU) as BA and PEPs are under enhanced Due diligence process.

5. **Data Recipients**

The personal data are processed by:

EIF staff members/consultants of

- a. transactional services,
- b. the Compliance Division,
- c. Risk and Portfolio Management,
- d. MIBO,
- e. internal audit, and

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<sup>1</sup> 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)

the Chief Executive and the Deputy Chief Executive and members of the Board of Directors of EIF. For specific due-diligence purposes, the aforementioned personal data may be shared with the EIB Group relevant services.

## 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**).
- 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](http://www.edps.europa.eu)) at any time (**right to lodge a complaint**).