

Data Protection Notice for customers, prospective customers, applicants and authorized representatives/agents of Structured Invest S.A. according to EU General Data Protection Regulation (GDPR)

The following Data Protection Notice provides an overview of how your data are collected and processed.

The following information is intended to provide you with an overview of our processing of your personal data and your rights under data protection law. The data processed in a particular case and the manner in which they are processed are described below.

The following Data Protection Notice applies especially to customers, prospective customers, applicants and authorized representatives/agents. Therefore it is possible that not all parts of this information will apply to you.

Structured Invest S.A. is mentioned in this context as the “Company”.

1. Who is responsible for data processing and whom can I contact?

The responsible party is:

Structured Invest S.A.
8-10, rue Jean Monnet
L-2180 Luxembourg
Telephone: +352 (0)248 248 – 00
Email address: fonds@unicreditgroup.lu

You can reach our Corporate Privacy Officer at:

Structured Invest S.A.
8-10, rue Jean Monnet
L-2180 Luxembourg
Telephone: +352 (0)248 248 – 00
Email address: fonds@unicreditgroup.lu

2. What data sources and types of data do we use?

We collect your personal data when you contact us, for instance as a prospect, authorised representative or agent, applicant, or customer – in other words, especially if you are interested in our products, submit applications, or use our products and services as part of an existing business relationship. In addition, to the extent necessary to provide our services, we process the personal data that we permissibly obtain from public sources (e.g. financial sanctions register, commercial registers and registers of associations, as well as the press, the Internet) and data that are legitimately sent to us by other companies in the UniCredit Group or other third parties.

Relevant personal data in the prospect process, when recording master data, when authorising an agent, etc. may be personal identifiers (name, address, and other contact information, date and place of birth, and citizenship), identification data (e.g. ID information), authentication data (e.g. signature specimen), and taxpayer ID. In addition, this can also include order-related data (e.g. payment orders), data based on the performance of our contractual obligations (e.g. data on turnover from payment transactions), information regarding your financial situation (e.g. data regarding creditworthiness, scoring/rating data, source of assets), statements and records concerning knowledge and/or experience as regards securities, interest-bearing and currency products/financial investments (MiFID status: suitability/appropriateness test), advertising and sales data (including advertising scores), documentation data (e.g. minutes of consultations) and other data comparable to the above categories.

3. Why do we process your data (purpose of processing the data) and on what legal basis do we do so?

We process personal data in accordance with the provisions of the European Data Protection Regulation (GDPR), Amended Act of 2002¹ and 4th AML Directive and respective AML Law of Luxembourg (Law 13 February 2018).

a. For the purpose of meeting contractual obligations (Art. 6 para. 1 b GDPR)

Data are processed to conduct business and provide services under the contracts with our customers and to implement pre-contractual measures, upon request (e.g. by interested persons). The purposes for which data processing is used primarily depend on the specific product or service (e.g. Underlyings, Payoff profiles, Fund formats, Registration and Administration, Special concepts, White-Label-Funds and possible fund migrations) and can include requirements analysis, consulting, and the execution of transactions, among other things. You

¹ Loi du 2 août 2002 relative à la protection des personnes à l'égard du traitement des données à caractère personnel.

can find additional details regarding the purposes for which data processing is utilised in the relevant contract documents and standard terms of business.

b. As part of a balancing of interests (Art. 6 para. 1 f GDPR)

In addition to processing your data for the actual performance of the contract, we process your data to the extent necessary to protect our legitimate interests and those of third parties. Examples:

- Examining and optimising requirements analysis procedures for the purpose of direct customer contact,
- Advertising or market-and-opinion research, to the extent that you have not objected to this use of your data,
- Asserting legal claims and mounting a defence in legal disputes,
- Ensuring IT security and the security of the Company's IT operations,
- Preventing and investigating criminal offences,
- Taking measures to ensure building and system security (e.g. admission control),
- Taking measures to ensure domiciliary rights,
- Taking measures to manage the business and further develop services and products,
- Ensuring risk control in the UniCredit Group.

c. With your consent (Art. 6 para. 1 a GDPR)

To the extent that you have given us your consent to process your personal data for specific purposes (e.g. sharing data within the UniCredit Group or business partners), such processing is lawful based on your consent. Once given, your consent can be revoked at any time. This also applies to declarations of consent provided to us before the GDPR takes effect, i.e. before 25 May 2018. The revocation of consent does not affect the lawfulness of data processed before the revocation.

d. Based on legal obligations (Art. 6 para. 1 c GDPR) or in the public interest (Art. 6 para. 1 e GDPR)

Moreover, as a management company, we are subject to various legal obligations, i.e. statutory requirements (e.g. the Luxembourg Law of the Financial Sector of 5 April 1993, Law of 12 July 2013 on alternative investment fund managers ("AIFM"), Law of 17 December 2010 on undertakings for collective investment ("UCITS"), the 4th AML Directive and respective AML Law of Luxembourg (Law 13 February 2018) and the tax laws) as well as regulatory requirements (e.g. those imposed by the Luxembourg Federal Financial Supervisory Authority CSSF, related CSSF Regulations). The purposes for which processing is used include credit checks, identity and age checks, fraud and money-laundering prevention, the fulfilment of control and reporting obligations under tax laws and the assessment and control of risks to the Bank and the UniCredit Group.

4. Who receives my data?

Within the Company, those parties that need access to your data to meet our contractual and statutory obligations receive such access. Service providers and agents utilised by us can also receive data for these purposes if they maintain banking secrecy. The latter are companies in the categories of IT services, logistics, printing services, telecommunications, collection, advising and consulting as well as sales and marketing.

With respect to the disclosure of data to recipients outside of our Company, it should first be noted that, as a management company, we are obliged to maintain confidentiality with respect to all customer-related facts and assessments of which we obtain knowledge (banking secrecy). We may only disclose information regarding you when statutory provisions so require or when you have consented to this or we are authorised to issue a bank reference. Under these conditions, the following parties may receive your personal data, e.g.:

- Public bodies and institutions (e.g. the Luxembourg Financial Supervisory Authority (CSSF), financial authorities, prosecuting authorities) if there is a statutory or regulatory obligation.
- Other financial services institutions or comparable institutions to which we send personal data in the pursuit of our business relationship with you (depending on the contract, e.g. service providers, depository banks, stock exchanges)
- Other companies in the UniCredit Group for risk control based on statutory or regulatory obligations.

Additional recipients of personal data can be those bodies to which you gave us your consent to transfer data or for which you released us from banking secrecy by agreement or consent.

5. Are data sent to a third country or an international organisation?

Data are transferred to locations in countries outside of the European Economic Area (so-called third countries) to the extent that

- it is prescribed by law (e.g. notification obligations under tax law), or
- you have given us your consent.

Beyond this, Structured Invest S.A. transmits no personal data to locations in third countries or international organisations. However, Structured Invest S.A. uses service providers for certain tasks, many of which also use service providers that may have their headquarters, parent companies or data centres in a third country. Data transfer is permissible if the European Commission has decided that there is an adequate level of protection in the third country (Art. 45 GDPR). If the Commission has not made such a decision, Structured Invest S.A. or the service provider may only transfer personal data to a service provider in a third country if suitable guarantees have been provided (standard data protection clauses, which have been accepted by the Commission or the supervisory authority in a specific proceeding) and enforceable rights and effective legal remedies are available. In addition, Structured Invest S.A. has contractually agreed with its service providers that basic data pro-

tection, which complies with the European level of data protection, must always be ensured by their contract partners.

6. For how long are my data stored?

We process and store your personal data for as long as is necessary to meet our contractual and statutory obligations, or as long as you are authorised to represent the particular (natural or legal) person to us. It should be kept in mind that our business relationship is a continuing obligation designed to last for years.

If the data are no longer necessary to meet contractual or statutory obligations, they are deleted on a regular basis, unless there is a need to further process the data – for a limited period of time – for the following purposes:

- To meet retention obligations under commercial and tax law: Such laws include the Commercial Code, the Amended Act of 2 August 2002 concerning the protection of individuals with regard to the processing of personal data, Amended Act of 30 May 2005 concerning the specific provisions for protection of the individual in respect of the processing of personal data in the electronic communications sector, the Luxembourg Law of the Financial Sector and 4th AML Directive and respective AML Law of Luxembourg (Law 13 February 2018) and the amended Art 88-2 and 88-4 of the Criminal Code. These laws prescribe five- to ten-year retention or documentation periods.
- To meet retention obligations under regulatory law: Such laws include Law of 12 July 2013 on alternative investment fund managers ("AIFM") and the Law of 17 December 2010 on undertakings for collective investment ("UCITS"). These laws prescribe five- to ten-year retention or documentation periods.

7. What are my data protection rights?

Every data subject has the right to **information** under Article 15 GDPR, the right to **rectification** under Article 16 GDPR, the right to **erasure** under Article 17 GDPR, the right to **restriction of processing** under Article 18 GDPR, the right to **object** under Article 21 GDPR and the right to **data portability** under Article 20 GDPR. In addition, there is a right to lodge a complaint with a competent data protection authority (Article 77 GDPR in conjunction with the amended Law of 2 August 2002 (art. 32, 35) .

You can revoke consent to the processing of personal data at any time. This also applies to declarations of consent provided to us before the GDPR takes effect, i.e. before 25 May 2018. Please keep in mind that the revocation is only effective prospectively and does not affect any processing done before the revocation.

8. Do I have an obligation to provide data?

Within the framework of our business relationship, you must provide the personal data that are necessary to initiate and conduct the business relationship and meet the related contractual obligations, as well as the personal data we are required to collect by law. Without this, we would generally not be able to conclude or implement a contract with you.

If you are an authorised representative, you must provide us with the personal information that is necessary to commence and implement representation/authorisation and to fulfil the associated contractual duties, or that we are legally required to collect. Without these data, we would generally be obligated to reject you as an authorised representative/agent or cancel any existing authorised representation/agency, as applicable.

In particular, we are required by anti-money laundering regulations to identify you using your identification document before establishing the business relationship or before setting up the representation/authorisation, and in so doing to collect and record your name, place and date of birth, nationality, address, and identification information. For us to meet this statutory obligation, you must provide us with the information and documents required by the Money-Laundering Act and promptly notify us of any changes that occur in the course of the business relationship. If you do not provide us with the necessary information and documents, we may not initiate or continue the business relationship you desire or establish or continue the authorised representation/agency desired by the respective legal entity.

9. To what extent do we use automated decision-making?

In accordance with Article 22 GDPR, we generally do not use fully automated decision-making to establish and conduct the business relationship. If we use this process in individual cases, we will give you separate notice, to the extent prescribed by law.

10. Is profiling carried out?

We do not use automated processing of your data with the goal of evaluating certain of your personal aspects (profiling). Under statutory and regulatory provisions, we are required to combat money-laundering, terrorist financing and crimes that endanger assets. Therefore, data analyses are conducted. These measures are also for your protection.

Information regarding your right to object under Article 21 of the General Data Protection Regulation (GDPR)

Under Article 6 paragraph 1 letter e GDPR (data processing in the public interest) and Article 6 paragraph 1 letter f GDPR (data processing based on a balancing of interests), you have a right to object to the processing of your personal data at any time for reasons arising from your particular situation. This also applies to any profiling based on this provision within the meaning of Article 4 No. 4 GDPR.

If you lodge an objection, your personal data will no longer be processed, unless we can prove that there are compelling legitimate reasons for processing the data, which override your interests, rights and freedoms, or that processing serves the purpose of asserting, pursuing or defending against legal claims.

The objection can be informal and should, if possible, be sent to:

Structured Invest S.A.
8-10, rue Jean Monnet
L-2180 Luxembourg
Telephone: +352 (0)248 248 – 00
Email address: fonds@unicreditgroup.lu