

PERSONAL DATA PROCESSING

EMUN PARTNERS family office, a.s., registered office: Anežská 986/10, Praha 110 00, Identification No.: 241 81 781, incorporated in the commercial register maintained by the Municipal Court in Prague, file B 17651 (hereinafter "Company") hereby informs about the purpose and the scope of controlling and processing of personal data within the Company in terms of time and subject, and about the rights enjoyed by the personal data subjects in this respect.

1 LEGISLATIVE FRAMEWORK OF PERSONAL DATA PROTECTION

Personal data-related rights and obligations are governed namely by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

2 DEFINITIONS

The term "**Personal data**" means any information enabling direct or indirect identification of a particular natural person.

The term "**Subject of personal data**"/"**Personal data subject**" means a natural person to whom the personal data relate.

The "**Controller**" of the personal data is the Company.

"**Processing of personal data**" is any operation that is performed with or without the help of automated procedures such as gathering, recording, organizing, structuring, storing, adaptation or modification etc., i.e. all handling with the provided data by the Controller.

The "**Processor of personal data**" is a company / natural person who, on the basis of a contract with the Company, and on the basis of its instructions processes the personal data.

Processed personal data

The company collects and processes the following personal data:

- personal identification data (name, surname, surname at birth, home address, date of birth, email address, etc.);



- information on the conclusion or non-conclusion of a contract / entry into a business relationship between the personal data subject and the Company;
- information about the Company 's client assets received on the basis of a contract and
- further course of the business relationship between the Company and the client;
- identification details of children obtained on the basis of the consent of a parent or another person authorised to act on behalf of the child;
- information about the hobbies and interests of the clients obtained on the basis of the business relationship between the client and the Company;
- personal data obtained by the Company in the context of the (non)performance of a concluded contract/of a business relationship with the personal data subject.

In principle, the Company neither gathers nor processes sensitive personal data as per cl. 9 of the Regulation, except for personal data of children.

3 DURATION OF PERSONAL DATA PROCESSING

The Company processes the personal data throughout the contractual/business relationship to which the data relates, and then for the period of time necessary for the administration of the contract/business relationship, but not for more than 3 years after the termination of the last contract/business relationship. The above time limitation doesn't apply to data processing periods stipulated by law the observance of which is the reason or one of the reasons of the data processing.

4 PURPOSES OF THE PERSONAL DATA PROCESSING

The personal data is processed by the Company for the following purposes:

- identification of contractual/business partners or other persons belonging in this group of subjects (e.g. statutory or other representatives, contact persons etc.);
- exercise of rights and obligations under the contracts concluded between the Company and personal data subjects;
- marketing aiming at improving the services provided to the clients and at fulfilling contractual obligations (personalised invitations to events);
- administration of contracts and business relationships of the Company, including potential administration and recovery of outstanding debts.

The personal data obtained by the Company is not used for profiling nor is it processed in any other systemic way for the purpose of automated individual decision-making (e.g. credit scoring).

5 RIGHTS OF PERSONAL DATA SUBJECTS

Pursuant to cl. 15 to 22 of the Regulation, the personal data subjects enjoy the following rights, which can be claimed under pre-determined conditions in writing (as well by e-mail) from the Company:

- right of access to personal data,
- right to rectification of inaccurate or incomplete personal data
- right to erasure of personal data,
- right to limitation of the processing of personal data
- right to portability of persona data,
- right to object and
- right not to be subject to automated individual decision-making, including profiling.

In case the Company breaches the obligations of personal data controller, the personal data subject may lodge a complaint to the Office for Personal Data Protection (www.uoou.cz).

6 CONSENT TO PERSONAL DATA PROCESSING

In principle, the Company obtains and processes data only for purposes which, in compliance with the Regulation, do not require prior consent of the personal data subject. Should the Company intend to process the personal data in a way requiring the consent of the personal data subject, it shall obtain the consent before starting to process the data. The consent to personal data processing may be withdrawn any time by their subject, and the Company shall in such case terminate the processing of the personal data the consent to which has been withdrawn. The withdrawal of consent shall not affect the right of the Company to continue processing persona data which, in compliance with the Regulation, does not require the personal data subject's consent, or which is carried out pursuant to a law stipulating a certain duration of the personal data processing.

7 PERSONAL DATA PROCESSORS

The Company may provide a subject's personal data to the following controllers/processors:

- cooperating securities brokers;
- cooperating investment companies.



An up-to-date list of your personal data controllers/processors is available upon request in the Company's registered office.