



## **INFORMATION ABOUT PERSONAL DATA PROCESSING**

### **WHO IS THE PERSONAL DATA CONTROLLER?**

The controller of the personal data of data subjects to whom the present document is intended is:

- EMUN PARTNERS investiční společnost, a.s., Identification Number: 284 95 349, registered office in Anežská 986/10, Praha 1, 110 00, recorded in the Commercial Register maintained by the Municipal Court in Prague, file B, insert 14867, (hereinafter „Company“),

The Company is the controller of personal data of owners of participating securities issued by the Fund, gathered in relation to the management or administration of investment funds (hereinafter „investor“) and to other personal data processed by the Company in relation to the investment funds management or administration.

### **WHY DO WE PROCESS YOUR PERSONAL DATA?**

Your personal data are processed by the company for the following purposes:

- performance of the contract on the basis of which the Company provides its services to the investor,
- fulfilment of legal obligations imposed by legal regulations (e.g. Act No. 253/2008 Sb., on Selected Measures against Legalisation of Proceeds of Crime and Financing of Terrorism, as amended, Act No. 240/2013 Sb., on Investment Companies and Investment Funds, as amended, Act No. 256/2004 sb., on Capital Market Undertakings, as amended, and others);
- marketing and commercial purposes (e.g. offering products and services).

The personal data may be processed under a contract or under a legal regulation. Should neither the law nor a contract constitute the reason for the data processing, the Company shall ask the data subject for their consent. The Company may process personal data also for direct marketing purposes due to its legitimate interest in promoting its products and services.

### **ARE YOUR PERSONAL DATA PROCESSED?**

The Company processes the personal data of the following categories of personal data subjects:

- owners of participating securities issued by investment funds,
- counterparties to the contracts under which assets are acquired to become part of the assets of investment funds, or to contracts relating to the assets of investment funds,
- other persons in connection to the management or administration of investment funds.

The company processes the personal data of the above-mentioned subjects to the extent to which they were provided at the conclusion of the contract or in the negotiation of the conclusion of the contract or communicated by the data subject later on during the term of the contractual relationship.

## **WHICH PERSONAL DATA DO WE PROCESS?**

The Company processes the following personal data categories:

In case of investors, the processed personal data are mainly the following: name and surname, date and place of birth, birth number, permanent residence address or other contact address, nationality, telephone number, e-mail address, number and period of validity of the identity card, information about the authority by which the identity card was issued, the value of funds or investment instruments in the investor's account maintained by the Company, the range of the investor's annual income, the investor's activity (employment, business), the value of the investor's assets, etc.

In case of counterparties, the processed personal data are mainly the following: name and surname, date and place of birth, birth number, permanent residence address or other contact address, nationality, telephone number, e-mail address, number and period of validity of the identity card, information about the authority by which the identity card was issued, etc.

The Company processes copies of identity cards only when required to do so by legal regulations (in particular Act No. 253/2008 Sb., on Selected Measures against the Legalisation of Proceeds from Crime and Financing of Terrorism), or in cases where the holder of the identity card give their consent to the Company making and processing a copy of the ID card.

## **BY WHOM IS YOUR PERSONAL DATA PROCESSED IN PARTICULAR?**

Personal data are processed by the Company's workers, and only by those for whose activities the personal data are indispensable.

The term "Company workers" includes both employees and third persons whom the Company uses in the performance of its activities.

The Company may provide personal data to processors - third persons, who perform activities requiring processing of personal data (e.g. book keeping) for the Company on a contractual basis.

In addition, in order to meet the obligations laid down by law, the Company may also provide personal data to public authorities (e.g. the Czech National Bank or investigative and prosecuting bodies and courts).

Personal data are processed both manually and automatically by means of Information and Communication Technologies.

## **HOW LONG DO WE PROCESS YOUR DATA?**

The Company processes personal data for the duration of the contractual relationship with the data subject and for the period for which it is required by legal regulations to keep the personal data.

If the Company processes personal data on the basis of a consent, it does so for the period for which the consent has been granted, or until the consent is withdrawn.

## **WHAT ARE YOUR RIGHTS RELATING TO THE PERSONAL DATA PROCESSING?**

### **Right to object**

The data subject may any time raise an objection to the personal data processing. If the objection is justified, the controller shall immediately terminate the processing.

### **Right to information**

The data subject has the right to access the personal data processed by the Company, including information about the purpose of the processing, the categories of personal data concerned, the personal data recipients, the scheduled processing time and their rights in relation to the personal data processing.

### **Right to correction**

The data subject has the right to the correction of inaccurate personal data and to completion of incomplete personal data.

### **Right to deletion**

The data subject has the right to request termination of processing (deletion) of their personal data. The right to the termination of processing may be exercised in the following cases:

- the purpose no longer exists,
- the consent to the personal data processing is withdrawn and no other legal reason for the processing exists,
- a justified objection is raised against the processing,
- the personal data is processed in an unlawful manner,
- the deletion is necessary for meeting a legal obligation or
- the personal data was gathered in relation to an offer of services by an information society to a child under 13 years of age.

### **Right to limitation of processing**

The data subject also has the right to request a limitation of the personal data processing. The right to the limitation of processing may be exercised in the following cases:

- the processed personal data is inaccurate; the processing may be limited for the period necessary for verifying the accuracy of the personal data,
- the processing is performed in an unlawful manner and the data subject refuses the deletion of the personal data and asks for a limitation of the data use instead,
- the controller no longer needs the personal data for the purpose of processing, but the data subject requests them for the determination, exercise or defence of legal claims, or
- an objection has been raised against the processing, until it is verified whether the justified reasons of the controller outweigh those of the data subject.

### **Right to data transferability**

The data subject also has the right to the transferability of personal data processed based on a consent or for the purpose of contract performance. The data subject has the right to get their personal data, which they provided to the controller, in a structured, commonly used and machine-readable format, the right to transfer the data to another controller, and the right for the data to be transferred directly by one controller to another, if technically feasible.

## **OTHER INFORMATION AND CONTACT DETAILS**

The data is provided on a voluntary basis. In cases when the Company is obliged to meet legal requirements for which the personal data provision is necessary, the non-granting of the consent with the provision may result in the impossibility to conclude a contract.



E M U N

If the personal data is processed on the basis of a consent, the data subject has the right to withdraw the consent any time. However, this is without prejudice to the lawfulness of personal data processing before the withdrawal of the consent.

The data subject has the right to file a complaint to the Office for Personal Data Protection any time in case they believe that legal regulations have been violated.

**Contact details of the personal data controller:**

Company name: EMUN PARTNERS investiční společnost, a.s.

Identification number (IČ): 284 95 349

Registered Office: Anežská 986/10, Praha 1, 110 00

**Contact details of the Data Protection Officer**

Ing. Tereza Šimůnková

e-mail: [tereza.simunkova@emun-partners.cz](mailto:tereza.simunkova@emun-partners.cz)