



Privacy Policy

This is a privacy policy to meet the obligation outlined in article 13 of the General Data Protection Regulation ((EU) 2016/679) to provide information to customers as data subjects.

Controller

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(hereinafter eQ)
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Name of register

eQ Asset Management Ltd's customer register

Purpose of and lawful basis for processing personal data

eQ processes personal data in its customer register to manage customer and service relationships, to market products and services, and to meet legal and official obligations. Obtaining personal data is a prerequisite for the establishment of a customer relationship, and a customer relationship cannot be started without the required data.

The processing of a customer's personal data is based on eQ's legal obligations and on the execution of a customer's agreement or order. When it comes to direct marketing, the processing of personal data is based on eQ's legitimate interest, as set out in article 6 of the General Data Protection Regulation, to offer information and market its services to customers. However, a customer can always object to the use of his or her personal data for direct marketing (please see section Customer rights). The processing of a customer's personal data in direct marketing is outlined in further detail in the privacy policy concerning the direct marketing register. eQ does not use personal data for automated decision-making.

eQ may use the data provided by the customer for the purpose of preventing, detecting and investigating money laundering and terrorism financing, and referring to investigation money laundering, terrorism financing and such crimes that were committed to gain

the property or proceeds of crime subject to money laundering or terrorist financing.

Sources of personal data

eQ primarily obtains the data on its customer register directly from the customer. In addition, eQ obtains data relating to contact and procurement from public registers, such as the population register, trade register, register of associations and register of foundations.

Transfer and disclosure of personal data

Parties responsible for the maintenance of the customer register and information systems (currently Elisa Corporation and Model IT Ltd) have access to the data on the customer register. eQ also discloses data to other companies within the eQ Group. These parties are bound by the same non-disclosure and other obligations as eQ.

In addition, eQ also discloses data on a legal basis to authorities such as the Financial Supervisory Authority, the Finnish Tax Administration, the police and enforcement authorities. Personal data relating to taxation is regularly disclosed to the Finnish Tax Administration without any separate request for information.

Transfer of personal data outside of the EU

eQ only transfers the data on its customer register outside of the EU with the customer's express consent, or if eQ is required to do so in order to meet its legal obligations.

eQ collects and discloses data concerning a customer who is tax liable to another country to the Finnish Tax Administration, which then sends the data to both EU and non-EU states. Such customer has the right to check the data to be sent and request any erroneous data to be rectified.

Storing of personal data

eQ stores data in the customer register in accordance with the Act on Investment Services (*Sijoituspalvelulaki 747/2012*) pertaining to a customer order, business activities carried out in the customer's name and services offered to the customer, and data submitted by the customer for a suitability assessment for five years after

the customer relationship ends. eQ also stores customer due diligence data in the customer register in accordance with the Act on Preventing Money Laundering and Terrorist Financing (*Laki rahanpesun ja terrorismin rahoittamisen estämisestä 444/2017*) for five years after the customer relationship ends. eQ stores other data on the customer for as long as is necessary with regard to the nature of the data, primarily for five years after the customer relationship ends.

Incoming telephone calls to eQ's sales or portfolio management employees are recorded and electronically archived in a system maintained by Elisa Corporation for five years after the customer relationship ends.

Customer rights

The customer has the right to:

- access the personal data stored concerning him or her;
- rectify any inaccurate personal data concerning him or her;
- request the erasure of and have erased personal data concerning him or her;
- restrict the processing of personal data concerning him or her;
- object to the processing of personal data concerning him or her;

- transfer the personal data concerning him or her from one system to another; and
- prohibit the use of personal data concerning him or her in direct marketing and in certain other situations specified in the General Data Protection Regulation.

The customer may send a free-form request relating to the exercising of his or her rights to eQ at the address given at the top of this privacy policy. If the customer requests access to personal data concerning him or her, eQ will submit a copy of the personal data saved in the register either in written or electronic format, or specify a location where the data saved in the register is available to view without undue delay and, in any case, within one month from reception of the request. eQ may as necessary extend this period by a maximum of two months if the complexity and number of requests so requires. The customer will be notified in such cases.

The customer also has the right to lodge a complaint with a supervisory authority, especially in that EU member state in which she or he has permanent residence or employment, or where the alleged breach of the General Data Protection Regulation has occurred. In Finland, the supervisory authority is the Data Protection Ombudsman.