

# Privacy Statement

## Fulfilment of Information Obligations Under Data Protection Law

We take the protection of your personal data very seriously. We, therefore, process your data on the basis of the statutory provisions General Data Protection Regulation (GDPR), Data Protection Act (DSG), Telecommunications ACT (TKG 2003). This privacy notice shall serve to inform you about the most important aspects of data processing on our website.

When collecting and processing your data, we strictly observe the statutory provisions, with special attention to the principles of lawfulness, fairness and transparency.

### Responsible company for the processing of data and its contact information

Superfund Asset Management is responsible for processing your personal data. You can contact the data controller with regard to any topics concerning data protection at

- Post: Marc-Aurel-Straße 10-12, 1010 Vienna
- Email: [datenschutz@superfund.com](mailto:datenschutz@superfund.com)
- Fax: +43 1 247 00 8111

### Legal basis and purpose of data processing

- Consent to data processing and legitimate interest

The purpose of data processing is acquiring customers through marketing measures in connection with all Superfund products as well as for contacting customers via postal service, telephone or electronic form. The purpose is also to give comprehensive support and advice in all investment-related matters and for developing new financial products. These measures include, inter alia,

- the transmission of advertising materials and information documents
- the transmission of marketing messages
- invitations to information events and talks with advisers

### Possibility to withdraw consent

A previously granted consent can be withdrawn at any time for any reason in writing by email: [datenschutz@superfund.com](mailto:datenschutz@superfund.com), by fax: +43 1 247 00 8131 or by post: Superfund Asset Management GmbH, Marc-Aurel-Straße 10-12, 1010 Vienna, subject: "Withdrawal Data Protection". Withdrawing consent does not affect the legality of the data processed on the basis of the consent given before withdrawing the consent. The data will then only be used as proof of the correct handling of previous activities (e.g. documentation of consent, previous delivery of marketing materials).

### Cookies

Our website uses so-called cookies. These are small text files that are saved to your device with the help of your browser. They do not cause any harm. We use cookies to make our website more user-friendly.

Some cookies will stay on your device until you delete them. They allow us to recognize your browser the next time you visit our website. If you do not want this, you can set up your browser so that it informs you when cookies are placed giving you the chance to decide on a case-by-case basis. By deactivating the cookies, the functionality of our website may be restricted.

- Contractual obligation of data processing  
The purpose of processing personal data is to provide financial services and fulfill customer contracts.
- Statutory obligation of data processing  
Data is processed in order to comply with the legal regulations applicable to Superfund Asset Management such as Sec. 21 of the Financial Markets Anti-Money Laundering Act (Finanzmarkt Geldwäschegesetz) for the Prevention of Money Laundering and Financing of Terrorism, the Securities Supervision Act (WAG), etc.

### **What data is processed**

All data necessary for the above-mentioned purposes and provided by customers and interested parties in the course of the business relationship will be processed.

This data includes contact information such as name, title, home phone number, mobile phone number, home address and email, nationality, occupation, bank account information, date of birth, place of birth, sex, marital status, highest level of education, business division/field of business activity, estimation of finances, estimation of assets, source of assets, tax affiliation, copies of photo IDs, correspondence, minutes of meetings, etc.

### **Newsletter**

You have the possibility of subscribing to our newsletter through our website. We will need your email address and your declaration that you agree to receiving the newsletter.

You can cancel your newsletter subscription at any time. Each newsletter has a link, by clicking on it, the newsletter will automatically no longer be sent.

### **Rights of data subjects**

Data subjects have the right to information, correction, deletion or restriction of the processing of the personal data provided as well as the right to transfer data.

If you believe that we have violated Austrian or European data protection laws in the processing of your data, we kindly ask you to contact us to clarify your concerns. You may also file your complaint with the Data Protection Authority.

### **Data transmission to recipients and other EU countries**

In order to guarantee the greatest possible data security, no information from interested parties is transmitted to recipients outside the company and also not outside of Austria.

Customer data is transmitted to the recipients necessary for fulfilling the contract, such as to the administrator and/or the registrar of the fund and the custodian. None of these recipients are located in other EU countries. Data of Gold Club members will also be passed on to the organiser of the activities, hotels and airlines, if necessary. In accordance with Austrian and European law, the Austrian Financial Market Authority is also the recipient of personal data from customers.

### **Data storage duration**

Should no relationship to the customer be formed, the data will be deleted after three years from the end of the financial year in which the last contact to the customer was made.

Customer data will be stored for the duration of the business relationship, starting with the initial contact to the termination of the contract. Due to the statutory retention obligations such as, for example, pursuant to the Austrian Corporate Code (UGB), the Securities Supervision Act (WAG), the Austrian Fiscal Code (BAO) and the Financial Markets Anti-Money Laundering Act (Fm-GwG), personal data is also stored after the business relationship comes to an end. After expiry of the statutory retention obligations as well as the statute of limitation according to the Austrian Civil Code (ABGB) to

assert civil law claims, all data will be deleted.

**Necessity to provide data:**

Within the scope of the business relationship, providing and processing data is a statutory obligation, according to, for example, the Securities Supervision Act 2018 (WAG) and the Financial Markets Anti-Money Laundering Act (FM-GwG) and therefore a requirement for concluding the contract.

Consenting to the processing of data for the purpose of marketing measures is not a legal obligation and not a requirement for concluding the contract.

**Profiling:**

Profiling is not taking place.