

Information on the processing of personal data¹

We, BRD Asset Management S.A.I. S.A. (hereinafter referred to as “BRD Asset Management S.A.I.”), with the registered office in Bucharest, 2 Dr. Nicolae Staicovici St., 5th floor, sector 5, registered with the Trade Register under no. J/40/7066/2000, Tax Identification Number 13236071, registration number in the ASF (Financial Supervisory Authority) Register PJR05SAIR/400010/26.02.2003, in the capacity of personal data operator, want to inform you on the manner in which we process² the personal data with regard to the activity carried out, as well as on your rights in the capacity of data subject.

According to the provisions of the General Data Protection Regulation (“GDPR”):

- “personal data” means any information relating to an identified or identifiable natural person; an identifiable person is a one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

- “processing” means any operation or set of operations carried out on the personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

The GDPR sets forth the rules relating to the protection of natural persons with regard to the processing of personal data, as well as the rules relating to the free movement of personal data.

I. FROM WHERE DO WE HAVE THE PERSONAL DATA?

BRD Asset Management S.A.I. processes the personal data of natural person investors, of their representatives, of the natural persons acting on behalf of the legal person customer or of an entity without

¹ Drafted in accordance with the provisions of Regulation (EU) no. 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 no. 95/46/EC (the “GDPR”), applicable as of 25 May 2018.

² The processing of data designates any type of operation (collection, storage, copying, erasure, disclosure, etc.) concerning personal data (data that can lead us to you or to another individualised person).

legal personality and of the beneficial owner (categories hereinafter referred to as “data subjects”), being registered with the National Supervisory Authority for Personal Data Processing under number 23680.

Processed personal data are the data provided by the investors and representatives in the process of joining the Fund or which BRD Asset Management S.A.I. S.A. generates as a result of the interaction with the investors and representatives via any of the existing communication channels. BRD Asset Management S.A.I. S.A. also processes personal data from external sources, such as registers and electronic databases (for example, entities empowered to manage databases with persons designated, subject to international sanctions for blocking-of-funds, politically exposed persons, etc.). We process the personal data you provide to us, directly or indirectly (for example, by representative or other persons representing you in the relations with BRD Asset Management S.A.I., such as the persons who are empowered to exercise the parental/tutelary authority) or which BRD Asset Management S.A.I. generates or concludes as a result of your interaction by any means of communication channels with BRD Asset Management S.A.I..

II. WHY DO WE PROCESS PERSONAL DATA?

The personal data are processed by BRD Asset Management S.A.I. for the following purposes:

- In order to fulfil the legal obligations incumbent on it, for the provision of services in accordance with the provisions of Emergency Ordinance no. 32/2012 on undertakings for collective investment in transferable securities and investment management companies and amending and supplementing Law no. 297/2004 on capital market and of A.S.F. Regulation no. 9/2014 on the Authorisation and Operation of Investment Management Companies (S.A.I.), of Undertakings for Collective Investment in Transferable Securities (O.P.C.V.M) and of the Depositaries of Undertakings for Collective Investment in Transferable Securities (O.P.C.V.M.), with the subsequent amendments and completions, based on the authorisation issued by the A.S.F.;
- Based on the legal obligations applicable to BRD Asset Management S.A.I. relating to the prevention and control of money laundering and to other legal regulations applicable to investment management companies and to undertakings for collective investment in transferable securities;
- With regard to the various reporting to public authorities and relevant institutions, such as reporting on FATCA (Foreign Account Tax Compliance Act) persons/the implementation of the Common Reporting Standard (CRS), reporting of suspicious transactions to the National Office for Prevention and Control of Money Laundering;
- In the context of various analyses, checks on the control structures within BRD Asset Management S.A.I. or as a result of referrals from a third party entity (including public authorities);
- In order to solve certain applications from investors, including any petitions addressed to BRD Asset Management S.A.I.;

BRD ASSET MANAGEMENT S.A.I S.A.

2 Dr. Nicolae Staicovici St., Opera Center II, 5th floor, sector 5, postal code 050558, Bucharest, Romania
Tel.: + 4021-327.22.28/ 321.20.12; Fax: + 4021-327.14.10; E-mail: office@brdam.ro; <http://www.brdam.ro>
Share capital: RON 4,000,000; Trade Register No. J40/7066/2000; Tax Identification Number 13236071;
ASF Authorisation – Decision no. 527/30.03.2001; ASF Register No. PJR05SAIR/400010/26.02.2003
Notification entered in the register of personal data operators under no. 23680

- In order to inform on the applicable legal regulations with an impact on the activity of investment management companies and open-end investment funds;
- In order to submit the necessary documents for the fulfilment of the fiscal liabilities of the investors, according to the provisions of the Fiscal Code;
- In order to request information on the operations with fund units;

In the case of a refusal to process the personal data, BRD Asset Management S.A.I. will not be able to provide the management services for which it was authorised.

BRD Asset Management S.A.I. may request the consent of the investors and representatives for the processing of personal data for commercial communications, such as:

- Information of the Funds Managed by BRD Asset Management S.A.I.;
- Requesting information and opinions on the Funds Managed in order to improve the insured activity;
- Carrying out market studies;

III. TO WHOM DO WE DISCLOSE THE PERSONAL DATA?

The personal data of the data subjects may be transmitted to:

- Main service providers (fund unit distribution services, depository services, payment processing services);
- Support and/or ancillary service providers (electronic communication services, IT services, audit services, physical and/or electronic archiving services, courier services, legal services, notarial or other consultancy services);
- Institutions and public authorities in Romania or abroad: the Financial Supervisory Authority (A.S.F.), the National Supervisory Authority For Personal Data Processing (ANSDPCCP), the National Office for Prevention and Control of Money Laundering (ONPCSB), the National Agency for Fiscal Administration (ANAF);
- Entities within the Societe Generale Group and the BRD Group, under the terms of the law;

IV. THE TRANSFER OF DATA ABROAD

The personal data are transferred only to states belonging to the European Economic Area (EEA) or states that have been recognised as having an appropriate level by a decision of the European Commission. The personal data may also be transferred to other states if the transfer is done based on appropriate safeguards (such as, using the Standard Contractual Clauses adopted by the competent authority – subject to their approval by the competent authority or the Binding Corporate Rules applicable at the level of the BRD Group).

BRD ASSET MANAGEMENT S.A.I S.A.

2 Dr. Nicolae Staicovici St., Opera Center II, 5th floor, sector 5, postal code 050558, Bucharest, Romania
Tel.: + 4021-327.22.28/ 321.20.12; Fax: + 4021-327.14.10; E-mail: office@brdam.ro; <http://www.brdam.ro>
Share capital: RON 4,000,000; Trade Register No. J40/7066/2000; Tax Identification Number 13236071;
ASF Authorisation – Decision no. 527/30.03.2001; ASF Register No. PJR05SAIR/400010/26.02.2003
Notification entered in the register of personal data operators under no. 23680

V. FOR HOW LONG DO WE KEEP YOUR DATA?

Under the applicable legal regulations, BRD Asset Management S.A.I. must keep all the information regarding the customer identification measures for a period of at least 5 years, starting with the date of termination of the relation with the customer. Also, with regard to the obligations to keep the supporting documents for the accounting records, these are kept for a period of 10 years as of the date of closure of the financial year during which they were prepared.

VI. WHAT ARE YOUR RIGHTS?

In accordance with the law, you have the following rights related to the processing of your personal data carried out by BRD Asset Management S.A.I.:

- a) **The right to be informed** on the processing of personal data;
- b) **The right to access**: the right to obtain a confirmation on the processing or not of the data and, if so, access to said data and to the following information: the purposes of the processing, the categories of personal data concerned, the recipients or the categories of recipients to whom the personal data concerned belong to, the recipients of the data, the period for which the data are expected to be stored, the existence of the right of rectification, erasure or restriction of the processing. BRD Asset Management S.A.I. allows the data subject to obtain a copy of the personal data free of charge.
- c) **The right to rectification**: the right to obtain the rectification of inaccurate personal data concerning you;
- d) **The right to erasure (“the right to be forgotten”)**: the right to obtain the erasure of personal data if one of the following reasons applies:
 - The personal data are no longer required for the purposes for which they were collected or otherwise processed;
 - The data subject withdraws its consent based on which the processing takes place and there is no legal ground for the processing;
 - The data subject opposes to the processing and there are no legitimate reasons for the processing;
 - The personal data have been unlawfully processed;
 - The personal data must be erased in order to meet a legal obligation incumbent on BRD Asset Management S.A.I.;
- e) **The right to restriction of processing**: the right to obtain the restriction of processing if one of the following cases applies:
 - The data subject challenges the accuracy of the data for a period that enables BRD Asset Management S.A.I. to verify the accuracy of the data;
 - The processing is unlawful and the data subject opposes to the erasure of the personal data, requesting in exchange the restriction on their use;

GROUPE SOCIETE GENERALE

- BRD Asset Management S.A.I. no longer needs the personal data for processing, but the data subject asks them in order to find, exercise or defend a right in court;
- f) **The right to data portability:** the right to receive the personal data provided to BRD Asset Management S.A.I. in a structured, frequently used and that can be automatically read format (for example, in a csv. format).
- g) **The right to object:** the right of the data subject to object to the processing of personal data due to the particular situation concerning it, in which case BRD Asset Management S.A.I. cannot provide the management services of the undertakings for collective investment in transferable securities. The investor may object at any time the processing for marketing purposes, including the profiling carried out for that purpose, as well as the processing based on the legitimate interest of BRD Asset Management S.A.I.
- h) **The right not to be subject of a decision based solely on automated processing,** including the creation of profiles, which produces legal effects concerning the data subject.
- i) **The right to file a complaint with the National Supervisory Authority for Personal Data Processing:** you have the right to file a complaint with the National Supervisory Authority for Personal Data Processing if you think that your rights have been violated:

The National Supervisory Authority for Personal Data Processing

28-30 G-ral. Gheorghe Magheru Blvd., Sector 1, postal code 010336, Bucharest, Romania

anspdcp@dataprotection.ro

The aforementioned rights may be exercised by submitting a written, dated and signed application using the following contact details:

FAO: the Data Protection Officer of BRD Asset Management S.A.I. S.A. (DPO)

2 Dr.Nicolae Staicovici Street, Opera Center II, 5th floor, Sector 5, Postal code 050558, Bucharest.

E-mail: dataprotection@brdam.ro.

The reply to the request received will be provided within one month of the receipt of the application. This period may be extended by two months where necessary, taking into account the complexity and the number of applications. BRD Asset Management S.A.I. shall inform the data subject of any extension within one month of the receipt of the application, together with the reasons for the delay. If BRD Asset Management S.A.I. cannot take any measures regarding the application received, it shall inform the data subject of the reasons for which it does not take measures.

BRD ASSET MANAGEMENT S.A.I S.A.

2 Dr. Nicolae Staicovici St., Opera Center II, 5th floor, sector 5, postal code 050558, Bucharest, Romania
Tel.: + 4021-327.22.28/ 321.20.12; Fax: + 4021-327.14.10; E-mail: office@brdam.ro; <http://www.brdam.ro>
Share capital: RON 4,000,000; Trade Register No. J40/7066/2000; Tax Identification Number 13236071;
ASF Authorisation – Decision no. 527/30.03.2001; ASF Register No. PJR05SAIR/400010/26.02.2003
Notification entered in the register of personal data operators under no. 23680