



S-BANK PLC

S-BANK FUND MANAGEMENT LTD

DATA PROTECTION PRIVACY STATEMENT

1. Data controller / data controller's contact information

S-Bank Fund Management Ltd

Postal address: Mikonkatu 9, FI-00100 HELSINKI, FINLAND

Visiting address: Mikonkatu 9, 00100 Helsinki, Finland

2. Contact information for Data Protection Officer

S Bank Group, Data Protection Officer

Postal address: S Bank Plc, P.O. Box 77, 00088 S-RYHMÄ, FINLAND

Email address: tietosuojavastaava@s-pankki.fi

3. Name of register

S-Bank Fund Management Ltd unit and investor register

The register includes personal data of private persons and persons acting on behalf of private persons or institutional customers holding funds managed and issued by S-Bank Fund Management Ltd.

4. Purposes of, and legal basis for, the processing of personal data

Investment fund operations and management of alternative investment funds, as well as associated functions The S-Bank Fund Management Ltd unit and investor register involves the processing of personal data necessary for the management of mutual funds and alternative investment funds to provide fund services and carry out fund assignments, for example. The data subjects of the register include the persons entered in the fund unit register of S-Bank Fund Management Ltd. The data subject can be a private person or someone acting on behalf of a private person, or an organisation, including a person who operates a business. The data subject can also be a responsible employee or authorised representative of a customer organisation, its beneficial owner or a person authorised to use the company's account.

The statutory obligations binding on S-Bank Fund Management Ltd require S-Bank Fund Management Ltd to collect sufficient information about its customers, among other things for the purpose of knowing the customer. Should the data subject fail for some reason to provide the required information, the data controller will not necessarily be able to provide the data subject with all services or products.

4. 1. Purposes of personal data

- carrying out the obligations stemming from legal mandates, and from orders and instructions issued by public authorities
- customer service, management and development of customer relationship, including customer communication
- provision, development and quality assurance of services
- development of business operations
- tracking and analysis of the use of products and services, and segmentation of customers, in order for the data controller to be able to provide users with suitable services and personalised content in products and services
- processing customer feedback and carrying out customer questionnaires and surveys, as well as processing and analysing the results and creating the related statistics
- targeting of advertisements and marketing
- risk management
- assurance of the safety of services and investigation of malpractice
- training purposes

4. 2. Profiling

The processing of personal data that is in the scope of the register includes profiling. “Profiling” means the automatic processing of personal data in which an assessment is made, through the use of this data, of certain personal features. Profiling is done to prevent money laundering and the financing of terrorism, as well as to detect malpractices and the risk of malpractice, for example.

4.3. Prevention and investigation of criminal activities

The personal data of the data subject may be used to prevent, expose and investigate money laundering and mounting a formal investigation of money laundering or terrorist financing and of crimes whereby the property or funds that were the object of the money laundering or terrorism funding were acquired.

Personal data of data subjects can be used to investigate whether a person is the object of international sanctions that the data controller is compliant with.

The data controller may process personal data concerning crimes or suspected crimes that are immediately targeted at the investment fund operations and management of alternative investment funds conducted by the data controller if such processing is unavoidable to prevent and investigate such crimes.

4.4. Legal bases for processing

Personal data is processed in the register on various different legal bases.

Below is a description of the legal bases for processing of personal data that are used by the register and examples of processing carried out on each basis.

Legal bases for processing

Legal basis	Example
Measures that precede entering into a contractual relationship or agreement	Measures that are based on an agreement or entering one.
Statutory obligation	For example, legislation preventing money laundering and terrorist financing require the information necessary for knowing the customer to be processed.
Legitimate interests of the data controller or a third party	<p>The development of processes, business and systems may require the processing of personal data. This way, the controller can improve the product range and optimise the services offered to data subjects. This may also involve profiling (see the paragraph on profiling).</p> <p>The legitimate interests of the data controller are normally based on a customer relationship, or an equivalent relationship, between the data controller and the data subject. The data controller ensures that the processing mentioned here is proportionate in view of the interests of the data subject, and that this processing meets their reasonable expectations. The monitoring of international sanctions by the data controller is also partly based on legitimate interests.</p>
Consent	Direct electronic marketing is generally based on the consent of the data subject.

5. Personal data categories

The personal data processed for the purpose of the register is divided into categories. You can find the personal data categories we process and descriptions of their data content below.

Personal data categories

Personal data category	Data content of the category
Basic data	<p>Basic data such as the data subject's:</p> <ul style="list-style-type: none">· name· address· personal identity code· date of birth· telephone number· email address· citizenship, country of residence and country of taxation· other information related to tax liability· position, profession <p>In addition, the following information may be processed in the register:</p> <ul style="list-style-type: none">· basic details of a trustee, authorised person or equivalent person party to the customer relationship· basic details of the responsible employee, authorised representative or beneficial owner of a customer company or organisation.
Descriptive data	<p>Descriptive data specified in legislation, such as information needed to identify a customer or to clarify their financial position or what political exposure they have.</p>
Customer relationship data	<p>Data that identifies and classifies a particular customer relationship, such as data on membership in a given customer-owner household, and investor profile information.</p>
Consents	<p>Consents and prohibitions given by the data subject concerning the processing of personal data.</p>
Agreement and product details	<p>Details of agreements between the data controller and data subject. The data subject's holdings per fund of all funds managed by S-Bank Fund Management Ltd.</p>

Personal data category**Data content of the category****Content of recordings and messages**

Records and messages in different formats, where the data subject is one of the parties, such as telephone call recordings or emails.

6. Personal data recipients and recipient categories

Personal data can be divulged to authorities such as the Financial Supervisory Authority of Finland and the Finnish Tax Administration in instances where this is legally mandated. Among the material submitted to the Tax Administration are annual tax declarations concerning the data controller's customers.

S-Bank Fund Management Ltd may divulge personal data, as permitted by law, within the S-Bank Group, for the purposes of customer service and other customer relationship management, marketing and risk management of the Group and the financial and insurance cluster.

7. Transfer of personal data

S-Bank Group uses subcontractors for data processing, and personal data is transferred in a limited manner outside the European Union or the European Economic Area. When data is moved to third countries, we use standard contractual clauses issued by the EU Commission or another transfer mechanism approved by legislation.

Some of the subcontractors we use are organisations other than companies within the S Group. Among other things, they provide us with IT and other support services.

8. Personal data retention time and criteria for determining retention time

Personal data is processed during the validity of the contractual relationship or as long as necessary due to the requirements based on the sector-specific legislation governing the financial sector. The requirements based on legislation dictate that S-Bank Fund Management Ltd retains some personal data even after the contractual relationship has ended. The retention of the information is based on regulations concerning the prevention of money laundering and accounting regulations, for example.

The retention period is usually the duration of the customer relationship and for a maximum 10 years after its expiry. When the retention period ends, the personal data are deleted or anonymised in compliance with the deletion processes of S-Bank Group.

9. Sources and updating of personal data

Personal data is collected primarily from the data subject him/herself. The data can be collected when the data subject uses certain services of the data controller, such as web services. Personal data can also be acquired from other representatives of the data subject, such as agents, within the framework of what is permitted by law.

In addition, we can collect and update, within the framework of what is permitted by legislation, your personal data from registers of third parties such as the Population Register Centre, the Trade Register and other public authority registers, and from data controllers of credit data.

We may obtain necessary information on your political influence and for determining whether you are subject to international sanctions from third parties maintaining databases on these subjects.

We may also obtain information from other companies within the S-Bank Group.

10. Rights of the data subject

You have the right to obtain our confirmation as to whether your personal data is being processed or not. If we process your personal data, you have the right to receive a copy of such data. We are entitled to charge a reasonable administrative fee for additional copies requested by the data subject.

If you make a request electronically, and have not requested any other delivery format, the data will be delivered in the electronic form that is generally in use, providing that the data can be delivered in a secure manner. To ensure data security, we always deliver a copy of personal data that is to be processed to S-Bank's online bank in electronic form.

You also have the right to request that we correct or delete your personal data, and you may prohibit the processing of personal data for direct marketing purposes.

You also have the right, in certain situations, to request restrictions on the processing of your personal data, or otherwise to object to the processing of this data. Additionally, you may request the transfer, in machine-readable form, of data that you have submitted yourself, based on the General Data Protection Regulation.

Please submit your requests related to the use of your rights by sending a message in the online banking service, calling +358 10 76 5800 (Inf/mcf), or visiting your nearest branch office. You can find the up-to-date opening hours of our customer service and contact information for our offices on our website.

If you consider that the processing of your personal data is contrary to law, you have the right to appeal the matter or contact the office of the Data Ombudsman, who acts as the supervisory authority.

11. Protection of the register

We protect personal data throughout its lifespan by using appropriate technical and organisational means of protection against the loss, unauthorised use or misuse or unauthorised divulging, amendments or deletion of the data.

The methods we use to protect and supervise the personal data include the following:

- protection of hardware and files
- access control
- identification of users
- management of access rights
- logging of usage events
- guidance and supervision of processing the personal data.

Personal data are only processed by our employees who must do so to carry out their duties. All persons processing personal data are bound by banking secrecy and obligation of confidentiality.

We also require our subcontractors to appropriately protect and carefully process any personal data they process.

If your personal data end up in the wrong hands despite all our protective measures, we will immediately investigate the matter and seek to prevent any damage caused by the infringement of personal data protection. We will inform the required authorities and the data subjects of the infringement of data protection in compliance with legal requirements.