

PRIVACY

Privacy Notice

This Privacy Notice explains how European and Global Investments Limited collects, uses and discloses the personal data you may provide, and your rights in relation to the personal data we hold.

In this Privacy Notice, “EGI”, “us”, “we” and “our” refers to European and Global Investments Limited.

We may amend the Privacy Notice from time to time, including to reflect changes in law and in the way, we process your personal data. This Privacy Notice will apply from 25 May 2018. It will supersede any previous version which you may have been provided with or have had access to.

Data Protection

EGI will process your personal data as a data controller and is subject to the Irish Data Protection Acts 1988 to 2018 (“DPA”) and to EU Regulation 2016/679 (“GDPR”), collectively, “Data Protection Legislation”.

Your Rights

Under GDPR, you have the following rights:

- To have access to, and copies of, your personal data;
- To require rectification of your personal data, if it is incorrect;
- To require us to erase your personal data;
- To require EGI not to send you marketing communications;
- To require EGI to restrict processing of your personal data;
- To object to EGI processing your personal data; and
- To transfer your personal data to another data controller.

Please note that these rights are not absolute and we may be entitled to refuse requests where exceptions apply. More information on these rights and exceptions can be found at <https://dataprotection.ie>.

What Information do we collect?

We may collect personal information in the following ways:

- From information you provide to us via our employees, telephone, email or other forms of electronic communication (e.g. Contact Us correspondence);
- When you complete an application form into an EGI fund;
- From third parties, including your agents, advisers and service providers; and
- From publicly available sources.

EGI will maintain the data for such period of time as may be required by Irish legal and regulatory requirements.

What categories of data do we collect?

This Privacy Notice applies to all individuals for whom we may hold personal data, including clients, investors in EGI funds and employees. Depending on your relationship with EGI, we may (where relevant) collect the following categories of personal data about you:

- Name, address, email address, telephone number;
- Date of birth, tax identification number, passport number or equivalent details;
- Information about your employment, education, family and personal circumstances and interests;
- Financial information, including, where relevant, bank account details; and
- Information or background checks for anti-money laundering/client due diligence purposes and for employee vetting.

What is the purpose & basis of collection?

EGI processes personal data to enable us to provide fund management services, to operate the EGI funds, to manage our business, including reporting to and communicating with regulatory, fiscal, law enforcement and other governmental bodies and maintain our own accounts and records, and to manage and support our employees. The processing of personal data will be necessary for our compliance with a legal obligation, for our legitimate interests, or for the performance of a contract to which you are a party.

How is the data used and who do we share it with?

Depending on your relationship with EGI, we may use your personal data:

- To provide tailored solutions to fund management;
- To operate the EGI funds;
- To determine whether you may invest or continue to invest in the EGI funds;
- To perform our reporting obligations to and communicate with clients;
- To comply with our anti-money laundering and client due diligence obligations; and/or
- To manage and support our employees.

Failure to provide us with personal data will prevent us from using your personal data as described above.

Disclosures to Service Providers and / or Third Parties

Personal data relating to you which is collected from you or provided by you or on your behalf may be handled by service providers appointed to any EGI fund and its or their duly appointed agents and any of their related, associated or affiliated companies (“Service Providers”) for the purposes specified above.

These Service Providers will be obliged to adhere to the data protection laws of the countries in which they operate.

EGI, the administrator or depositary of any EGI fund ,may disclose your personal data to other third parties where required by law or for legitimate business interests. This may include disclosure to third parties such as auditors and the Central Bank of Ireland, regulatory bodies, taxation authorities and technology providers.

Transfer of personal information

It may sometimes be necessary to transfer personal data outside the European Economic Area. When this is needed, information may be transferred to countries which may not have the same or equivalent data protection laws to the Ireland. Any transfers made will be in compliance with the DPA and GDPR.

Contact Information

If you have any questions about this Privacy Notice or your data protection rights, please contact us on +353 1 237 4689 (weekdays 9.00am to 5.00pm) or at the following email address: info@egifunds.com