

PROCESSING OF PERSONAL DATA

Afalon Investment Management Oy collects personal data from customers in order to provide financial services to customers. The information we collect can be categorised into:

- Identifying information: personal identification number and name. For identification purposes, we need a copy of your passport, ID card or other similar document.
- Contact information: telephone number, e-mail, home address, proof of residence
- Professional information: education or profession
- Financial information: regular income and expenditure, investment assets, origin of funds
- Information relating to legal requirements and taxation: countries of taxation, tax identification numbers, information relating to the prevention of money laundering and terrorism financing

This information is collected both from the individual and from registers maintained by third parties. The third-party registers we use include registers maintained by public authorities and sanction lists maintained by international organisations.

Afalon uses personal data to fulfil its legal and contractual obligations and to provide financial services to customers. The main purpose of processing personal data is to collect, process and verify personal data before entering into a contract and to document, manage and perform the tasks under the contract.

Legal obligations that require the processing of personal data include.

- Customer due diligence (KYC)
- Prevention, detection and disclosure of money laundering and terrorist financing
- Coercive checks
- Reporting of tax data

Personal data is also processed for marketing purposes, where Afalon has a legitimate interest in using personal data.

Afalon discloses personal data to, for example, public authorities and business partners. The transfer of personal data to business partners is always related to the service provided to the customer and is necessary for the performance of the agreed service.

The customer has the right to request access to his/her personal data and to access the data held by Afalon about the customer. This right may be limited by law and the privacy of other persons.

The customer has the right to request the correction of inaccurate or incomplete data.

The customer may request the deletion of data in the following cases:

- The customer withdraws consent to the processing of the data and there is no other legitimate ground for the processing.
- If the data subject objects to the processing and there is no acceptable reason for continuing the processing
- The customer objects to the processing of the data for direct marketing purposes.
- The processing of the data is unlawful
- The personal data of a minor collected in connection with the acquisition of information society services

The customer must understand that deletion of the data may prevent the provision of the service to the customer.

The customer has the right to restrict the processing of personal data. If the Customer has contested the accuracy of the data or the lawfulness of the processing of the data, or if the processing of the data has been contested in accordance with the law, the Customer may request Afalon to restrict the processing of personal data to the purpose of data retention only. The processing of the data will then be limited to the storage of the data until the accuracy of the data has been verified or it can be established whether Afalon's legitimate interests prevail over the interests of the customer.

The customer always has the right to object to the processing of personal data for direct marketing purposes or profiling related to direct marketing.

If the customer wishes to exercise the rights listed above, requests will be assessed on a case-by-case basis. Afalon may retain and use data where necessary to comply with legal obligations, to resolve disputes or to enforce contracts.

We will retain the information for as long as it is necessary to implement the contract and as long as required by law or regulation for the retention of information.