

Handling of customer data, fund and wealth management customers	
Registrar	Afalon Investment Management Oy Energiakatu 4 00180 Helsinki Finland tel. +358 20 7343 16 contact@afalonim.com
Contact person	Jarmo Lappalainen tel. +358 50 552 0977 jarmo.lappalainen@afalonim.com
Purpose and legal basis for the processing of personal data	<ul style="list-style-type: none"> - Data relating to the knowledge and identification of the customer. - Opening and management of customer contracts and services. - The processing of personal data is necessary to comply with Afalon Investment Management Oy's legal obligation and to execute a contract with the client.
Registered	<ul style="list-style-type: none"> - Persons who have or have had a client relationship with Afalon Investment Management Ltd. - Beneficiaries or authorised representatives of these persons
Recipients of personal data	<ul style="list-style-type: none"> - Afalon Investment Management Oy - Caseis I.S. Bank S.A. - Operations Unit (for fund accounts) - Public authorities
Retention period of personal data	Client data must be kept for the duration of the client relationship and for 10 years after the termination of the client relationship (for dispute resolution purposes)
Data to be collected	<ul style="list-style-type: none"> - Name - Address - Personal identification number - Place and date of birth - Nationality - Identity card number - Bank account number - E-mail address - Telephone number - Country of taxation - Occupation or former occupation - Education or training

	<ul style="list-style-type: none"> - Insider details - Business identity number of the corporate client - Details of the representative and beneficial owner of the corporate customer - Details of the representative of the retail investor - Information on investment experience - Information on assets, income and expenditure - Politically exposed person - Information on FATCA and DAC declarations
Sources of register data	Register data are obtained from the client or the client's representative and from public authority registers
Transfer of data to third countries	For fund clients, data is sent to Caseis I.S. Bank S.A. in Luxembourg
Regular disclosures of information	Information may be disclosed to public authorities in order to exercise their legal right of access to information
Security of the register	The manual client register is kept in a locked room with access control. The electronic customer register is protected by user IDs and passwords.
Right of inspection and right to request correction of data	The data subject has the right to request access to data concerning him or her and the right to request the rectification or erasure of such data or the restriction or objection of processing, as well as the right to data portability. The law may prevent the disclosure of some data to the data subject (e.g. data relating to money laundering or market abuse).
Contact details of the Data Protection Ombudsman	The data subject has the right to lodge a complaint with a supervisory authority. The contact details of the Authority are: Office of the Data Protection Ombudsman The Office of the Data Protection Authority (DPO) is located at 9 Ratapihantie P.O. BOX 800 00520 Helsinki tel. +358 29 56 66700 tietosuoja@om.fi

Non-disclosure of personal data	The disclosure of personal data is required by law and the non-disclosure, deletion or restriction of processing prevents the provision of investment services to the client.
Other uses of register data	The register data may be used to send customer information or marketing material. The client has the right to object to the use of his/her data for marketing purposes.

Customer data processing, CRM and distribution lists

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Purpose and legal basis for the processing of personal data	<ul style="list-style-type: none"> - Maintenance of customer contact details - Mailing lists - Sending reports, monthly reviews and other information - The processing of personal data is necessary for the purposes of the legitimate interests pursued by Afalon Investment Management Oy
Data subjects	<ul style="list-style-type: none"> - Persons who have or have had a client relationship with Afalon Investment Management Oy. - Beneficiaries or assignees of these persons - Potential clients
Recipients of personal data	<ul style="list-style-type: none"> - Afalon Investment Management Oy
Retention period of personal data	The data will be kept for as long as Afalon Investment Management considers it necessary for the purpose for which it was collected and processed.
Data collected	<ul style="list-style-type: none"> - Name - Address - Details of the organisation - E-mail address - Telephone number - E-mails

Sources of registered data	Register information is obtained from the customer, public sources or participant data.
Transfer of data to third countries	Data will not be sent to third countries.
Regular disclosures of data	Afalon Investment Management does not disclose data to third parties.
Protection of the register	The electronic client registers and distribution lists are protected by usernames and passwords.
Right of access and right to request correction of data.	The data subject has the right to request access to data concerning him/her, the right to request the rectification or erasure of such data or restriction of processing, the right to object the processing and the right to transfer data to other system.
Contact details of the Data Protection Ombudsman	The data subject has the right to lodge a complaint with a supervisory authority. The contact details of the Authority are: The Office of the Data Protection Commissioner Ratapihantie 9 P.O. Box 800 00520 Helsinki Finland Tel. +358 29 56 66700 tietosuoja@om.fi