

PERSONAL DATA PROCESSING INFORMATION

OF THE MANAGEMENT COMPANY KBC ASSET MANAGEMENT N.V., BELGIUM, OPERATING IN BULGARIA THROUGH KBC ASSET MANAGEMENT N.V. - BULGARIA BRANCH

Protecting your personal data is important to us. We have taken the necessary organisational and technological measures to process your personal data in a lawful, appropriate and transparent manner. This personal data processing information explains what personal data we will process about you, for what purposes and on what grounds, to what recipients we might provide it, and for what periods we retain it.

We encourage you to read this information carefully to learn more details about how your personal data is processed in your capacity as a customer, potential customer, person related to a customer, co-counterparty, contact person, representing a legal entity or other interested party. No matter for what purposes and on what grounds your personal data is processed, we will treat it with equal care. This document also contains information about your rights and how you can exercise them.

This privacy notice may be updated and the latest version is available at www.ubb.bg and www.ubbam.bg. We will notify you of any material changes to this information on our website or through another communication channel.

More information on Bulgarian data protection legislation is available on the website of the Commission for Personal Data Protection: www.cdpd.bg

1. About the Company

Management company KBC ASSET MANAGEMENT N.V., Belgium, acting on the territory of Bulgaria through KBC ASSET MANAGEMENT N.V. – BRANCH, BULGARIA, UIC 205422541, Sofia, 89B Vitosha Blvd., (hereinafter referred to as the MC).

For questions relating to the processing of personal data, you can contact the Data Protection Officer at dataprotectionkbcam@kbc.be.

MC, as a Data Controller, operates in strict compliance with the requirements of the Personal Data Protection Act and Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data in order to ensure the confidentiality and lawful processing of your personal data. MC is part of the KBC Group. KBC Group is a banking and insurance group of companies which, in a cooperative manner, create and distribute banking, investment and insurance products and offer financial services related to these products. The following companies belong to the KBC Group in Bulgaria: "United Bulgarian Bank" AD, "DZI – General Insurance" EAD, "DZI – Life Insurance" EAD, "UBB Interlease" AD, "UBB Life Insurance" EAD, "UBB – Insurance Broker" EAD and "UBB Factoring" EOOD. The main target groups of KBC Group are individuals, small and medium enterprises and corporate clients. KBC Group operates mainly in Belgium, Czech Republic, Slovakia, Hungary, Bulgaria and Ireland.

MC is the data controller in respect of the personal data of its customers.

2. Definitions

a. **"Personal data"** means any information relating to an individual /data subject/ who is identified or identifiable, directly or indirectly, by an identifier such as: name, personal identification number, location information, gender, address, telephone number, online identifier, or by one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

b. **'Processing of personal data'** means any operation or set of operations which is performed upon 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.

3. Rights of data subjects

If you are a person whose personal data is processed by the MC, in accordance with the General Data Protection Regulation in force since 25.05.2018, you have the following rights, which you can exercise by visiting the MC branch office.

a. **Right of access** – Upon your request as a data subject, the MC is obliged to provide you with information on the categories of personal data relating to you that are collected and processed by it, as well as on the purposes for which they are processed, on the recipients or category of recipients to whom your personal data are provided, on the sources from which the data were obtained, except in cases where they were collected directly from you.

b. **Right to rectification, suspension of processing (imposition of processing restrictions and/or erasure (erasure))** – At your request, the MC is obliged to rectify, erase or suspend the processing of your personal data if there is a case where its processing is unlawful. In such cases, MC will notify any third party to whom your personal data has been disclosed of any corrections or erasures it has made and where it has stopped processing your personal data.

c. **Right to portability of personal data** – As a data subject, you have the right to request to receive the personal data relating to you that you have provided to the MC in a commonly used, structured and machine-readable format and you have the right to transmit/transfer that data to another Controller without the MC, as the data controller to whom you have provided your data, creating obstacles for you, where the basis for the processing of the personal data is consent or a contractual obligation and the processing of your personal data

d. **Right to object** – As a data subject, you have the right to object to the processing of your personal data where the processing of your data is based on a legitimate interest of the MC. MC shall consider the objection and provide you with its opinion in writing within 30 days, unless an extension of time is necessary, which the MC will notify you of in due time. After examining the objection, the MC shall, as a general rule, suspend the processing of your personal data and notify all interested parties to whom the personal data have been transmitted of the objection received and of the measures taken in this respect. However, in some cases, the MC has a compelling legal basis to continue processing your personal data even after receiving your objection (e.g. in the case of legal proceedings, surveillance in case of suspected fraud, etc.). In these assumptions, MC contacts you to clarify the reasons why it will

continue to process your personal data. f. **The right to withdraw your consent** to the processing of your personal data for the purposes set out in the Consent Declaration. You can withdraw by submitting a Withdrawal Declaration in the form provided at the MC branch office.

g. **Right to lodge a complaint with the Commission for Personal Data Protection (CPDP)** – As a data subject, you have the right to lodge a complaint with the Commission for Personal Data Protection (CPDP) against the actions of the MC branch in relation to the processing of your personal data.

In cases where you exercise your rights as a data subject, it is necessary to prepare a detailed description of your request in the application submitted to the MC. When exercising your rights, it is necessary for the MC to verify your identity so that it does not appear that someone else is trying to impersonate you. To do this, an MC officer may ask you for your ID card or other identification document when providing the information you request.

You may ask questions in writing about the processing of your personal data by the MC, both in our office and electronically at ubbam@ubb.bg.

If you disagree with the MC's opinion on the submitted request or wish to obtain more information, please visit the website of the Commission for Personal Data Protection: www.cpdp.bg, where you could lodge a complaint.

In cases where the MA has received your personal data from third parties, e.g. Central Depository AD (www.csd-bg.bg) and processes it for its own purposes, you may lodge a complaint against the actions of these third parties directly with them.

The exercise of your rights may not be opposed to the provision of your personal data to the competent authorities for the prevention, investigation and detection of crime.

4. Types of personal data processed

MC may process different types of personal data relating to your physical, social or economic identity. The data may be obtained from you as the data subject as well as from third parties.

4.1. MC may process different types of data depending on the purpose of the processing, such as:

A) Basic data

(a) *Based on the requirements of the Measures Against Money Laundering Act:*

- All data from an identity document (including taking a copy of it);

(b) *On the basis of the requirements of the Collective Investment Schemes and Other Undertakings for Collective Investments Act, as well as the Ordinance No. 44 of 20.10.2011 thereto:*

- phone number - mobile/landline
- email address
- mailing address

(c) *On the basis of the person's express consent regarding his/her access to the "Investor's Area" on the website of KBC ASSET MANAGEMENT N.V. – BULGARIA BRANCH – www.ubbam.bg*

- names
- PIN
- phone number - mobile/landline
- email address

B) Extended data

MC may only process some or all of the following categories of Extended Data to achieve the purposes described below where it has a basis for doing so.

(a) based on the requirements of the Tax Procedure Code:

- tax number (for nationals of Member States)
- information on whether the customer is a taxable person under the legislation of a third country;

(b) based on the requirements of the Measures Against Money Laundering Act:

- information on the origin of funds
- names and PIN of the beneficial owner of the legal entity
- information on whether you hold/have held a senior public office (prominent political figure within the meaning of Article 36 of MAMLA);

(c) based on the requirements of the Markets in Financial Instruments Act:

- information on your knowledge and experience regarding the services provided by the MC
- details of your financial situation
- your loss-bearing capacity and risk tolerance level

(d) to identify you:

- client number

(e) to provide you with the right advice and services:

- Financial products in portfolio
- your potential interest in MC products
- A history of the details of your financial information and advice we have given you in the past;
- Feedback, comments and suggestions, previous complaints. These can definitely help the MC to offer you a better service in the future.

4.2. Public data and data acquired through third parties

MC sometimes processes public information, such as:

- Information that needs to be disclosed on a public database, such as if you are appointed as a company manager/director or attorney, or if you are the owner of a company;
- MC may also receive your personal data from third parties:
 - from persons related to you

- Persons authorised by you in connection with entering into a business relationship with the MC.

Such public data may be processed for the purposes listed in this document to verify the accuracy of the information in the MC database.

5. Recipients of personal data

Personal data is generally processed by employees of the MC. The processing of personal data may also be carried out by other processors with whom the MC has concluded a contract for this purpose and who carry out activities forming part of the services provided by the MC. Where there is a lawful basis, personal data may be provided to other controllers who may use it for their own lawful purposes.

a. Data controllers to whom the MC may provide personal data:

- BNB (Bulgarian National Bank)
- CPDP (Commission for Personal Data Protection)
- CCP (Commission for Consumer Protection)
- Central Depository
- National Revenue Agency
- National Social Insurance Institute
- National Health Insurance Fund
- Operators of card and payment services and systems such as Borica AD, VISA, Mastercard, Bissera, Rings
- State Agency "National Security", Criminal Intelligence Service
- Law enforcement authorities /courts etc./, Prosecutor's Office
- Bulgarian Stock Exchange
- Financial Supervision Commission
- Ministry of Interior
- Guarantee funds and financial institutions such as the European Investment Fund, the National Guarantee Fund, the Investor Compensation Fund, the European Bank for Reconstruction and Development, the European Investment Bank, the European Court of Auditors, the European Commission and other bodies of the European Union with audit and control functions.
- Other companies of the KBC Group, as data controllers

In the event of changes to the list of data controllers to whom personal data is provided, the MC will update this document.

b. The processors of your personal data are:

Natural persons or legal entities, public authority, agency or other body that process personal data on behalf of the controller.

As part of the KBC Group, MC may outsource certain data processing activities to other processors within the Group. Some of these data processing activities outsourced by the MC relate to control and support functions such as:

- financial reporting
- administration
- compliance
- risk
- marketing
- ICT Management
- internal audit
- a research team that develops models to improve services and products.

MC may directly or indirectly use other processors with whom it has contracted, such as:

- persons entrusted with the production, completion and delivery of MC information forms
- persons to whom the Controller has entrusted the processing of personal data for organisational reasons
- providers of products and services for the MC companies providing information and communication technologies to facilitate the operation of operating systems and services (IBM, Microsoft, etc.)
- external auditors contracted by the MC
- companies specializing in digital information archiving and access
- if there are legitimate grounds, such as a legitimate interest of the controller, your personal data may be provided for other purposes to other KBC Group companies in Bulgaria or abroad or may be processed by the MC if lawfully collected from other KBC companies in Bulgaria or abroad.

c. Recipients outside the European Economic Area (EEA)

Some of the recipients listed above may be based outside the European Economic Area. MC forwards personal data to countries that are not members of the European Economic Area (third countries), provided that an adequate level of protection of personal data is ensured under local and European law and the personal data provided is sufficiently protected in the third country concerned and subject to the approval of the Commission for Personal Data Protection . Your personal data may be provided to third parties outside the European Economic Area with your explicit and freely given consent. MC will take all necessary measures to protect your personal data by restricting its disclosure to third parties within or outside the European Economic Area.

6. Purposes in personal data processing

The personal data collected by the MC in its capacity as Data Controller is processed for different **purposes** and on different **legal grounds** as follows:

6.1. Purposes where the basis for processing your personal data is an obligation arising from law:

a. Establishing your identity as a customer of the MC and the veracity of your personal data – the basis for processing the data for this purpose is the Measures Against Money Laundering Act and its Implementing Regulations.

b. Control for the purpose of anti-money laundering, embargo and anti-terrorist actions – The processing of your data is related to measures and actions taken by the MC to prevent, detect, investigate and report suspicious transactions to the Specialized Financial Intelligence Directorate under the Measures Against Terrorist Financing Act, Measures Against Money Laundering Act and its Implementing Regulations.

c. Client profiling for the purpose of providing services related to financial instruments (including the provision of investment advice)

MC profiles its clients based on a questionnaire on its knowledge and experience of the MC's products, its financial condition, its ability to bear losses and its investment objectives, including its risk tolerance, creating a risk profile for the purpose of providing investment services as required by the Markets in Financial Instruments Act. This activity is delegated to UBB AD as distributor.

d. Exercising control to prevent and detect market abuse.

MC processes your data in order to take action to prevent, detect, investigate and further implement necessary measures in cases of alleged market abuse in accordance with the Measures against Market Abuse with Financial Instruments Act.

e. Reporting to government and regulatory authorities – requirements of the Foreign Account Tax Compliance Act (FATCA) and changes to the Tax and Social Security Procedure Code (TSSPC) relating to the automatic exchange of financial information in the field of taxation (CRS=Common Reporting Standard). In connection with these requirements, your personal data collected will be processed for accounting and tax purposes to meet reporting requirements to the competent authorities on the basis of obligations arising from the law.

6.2. Purposes for which the processing of your personal data is based on the performance of a contract

a. Concluded contracts – in your capacity as an investor with whom the MC has concluded a contract, the MC holds your specific personal data (e.g. name, date of birth, personal identification number, number of personal ID, address, e-mail address) as well as other data for contacting you. MC may also request additional information from you conditional on the nature of the services covered by the contract.

6.3. Purposes for which the processing of personal data is carried out on the basis of the protection of the legitimate interests of the controller:

a. Historical, statistical or scientific purposes – MC has a legitimate interest in processing your personal data for the purpose of preparing statistical summaries and reports, carrying out scientific and development activities, carrying out historical reviews and forecasts of the development of the economy, the financial industry, the needs of clients, etc. Aggregated data derived from the records of specific personal data of customers are used for these purposes.

b. Sending messages about the products and services you use – MC processes your personal data for the purpose of sending you messages about the products and services you use via phone calls, emails, sms, letters, etc. The messages only concern products and services you have already used, are not related to achieving specific marketing objectives and do not contain an offer for new services.

c. Litigation – establishing, exercising and defending MC rights – MC processes customer data in order to defend its rights in legal proceedings, in settling claims, including with the help of external lawyers/lawyers, etc. This is the case where your personal data is processed in connection with the administration of information concerning litigation, court orders, applications and court judgements.

d. Testing changes to software applications, demonstration platforms and internal training portals – MC uses your personal data to create or update software applications to work with Mc's operating systems for:

- testing changes to software application codes in different testing/adoption environments (e.g., improving distribution channels or ensuring more robust protection of collected personal data)
- incident resolution – simulation of incidents
- demonstration platforms
- employee training

f. Identification for the purpose of allowing access to data and information on the investor's personal account, through his access to the "Investor's Area" on the website of KBC ASSET MANAGEMENT N.V. – BULGARIA BRANCH – www.ubbam.bg, based on the person's explicit consent. This data is not used by the MC for any other purpose beyond providing access to the investor's personal information, to the amounts invested by the investor, the holdings, dates and other parameters of the transactions made by the investor.

The processing of personal data for these purposes is necessary to protect the legitimate interests of the MC as a data controller relating to its activities as a management company (respectively branch) offering the best products and services to its clients. Any data subject shall have the right to object to processing of personal data concerning him or her for purposes which are based on the legitimate interest of the controller. More information is provided in section 3 of this document.

7. Personal data retention period

MC uses your personal data only if there is a clear purpose. When the purpose for use ceases, we stop retaining the data.

The basis for retention your data is rooted in the statutory retention period (which is often five years after the end of the relevant legal relationship). The period may be longer where necessary to exercise our rights or other legal requirements. Where there is no statutory time limit, the period may be shorter.