

WHISTLEBLOWING PRIVACY NOTICE

Protecting your personal data is important to us. We have taken the necessary organisational and technical measures to process your personal data in a lawful, appropriate and transparent manner and to safeguard your rights. With this information, we would like to inform you how your personal data is processed, for what purposes and on what grounds this happens, to which recipients we could possibly provide the data, for what period of time we keep it and how you could contact us for further inquiries when the data is processed in connection with whistleblowing, which falls under the Whistleblower Policy. If necessary, we may update this information on the processing of personal data and the current version can be found on our website www.ubbam.bg.

1. Information about the controller and the data protection officer

Management company KBC ASSET MANAGEMENT NV, Belgium, acting on the territory of Bulgaria through KBC ASSET MANAGEMENT NV - BRANCH, BULGARIA, UIC 205422541, 89B Vitosha Boulevard, Sofia, Bulgaria (hereinafter referred to as the ManCo).

For questions related to the processing of personal data, you can contact the Data Protection Officer at the official communication addresses of the Branch or at: dataprotectionkbcam@kbc.be. KBC ASSET MANAGEMENT NV, Belgium, acting in the territory of Bulgaria through KBC ASSET MANAGEMENT NV – Branch, BULGARIA, as the controller of personal data processed through the EQS Secured Whistleblowing Channel Platform (the "Platform"), 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" (the "Regulation") with a view to ensuring the confidentiality and lawful processing of personal data in accordance with the principles relating to the processing of

2. Your rights as a data subject

The purpose of this document is to provide you with information about how we process your data for the purposes of the Platform. If you have any further questions about the processing of your personal data, or if you wish to exercise any of your rights as a data subject, e.g.: the right of access to information and data, the right to request rectification or erasure of data or restriction of processing of personal data, the right to object to processing of personal data, and the right to data portability, you may write to us at the following email address: ubbam@ubb.bg or at the physical address above.

Exercise of data subjects' rights

Requests for the exercise of your rights shall be made in person or by a person expressly authorised by the data subject. When exercising the rights of data subjects, the controller may request to identify and verify the identity of the data subject, respectively the powers of the authorised person. For this purpose, it may request a valid identification document from you when accepting an application to exercise a right and when providing the information requested by you.

3. Processing of personal data by the Controller

3.1. Purposes for processing personal data

The Controller will process through the Platform a limited set of personal data for the following purposes:

- Receiving, registering, processing and storing whistleblowers reports
- Establishment and maintenance of an electronic channel for internal reporting (the Platform) set up by the economic group to which the obliged person belongs and monitoring of activities - Preservation of evidence relating to rights to establish, exercise and defend legal claims.

3.2. Categories of personal data

For the purposes described above, the following categories of personal data may be processed through the Platform:

- Identification and contact details of the whistleblower - three names, address, telephone number, email address, signature, electronic signature or other form of identification;
- Details of the person against whom the alert is made, if the alert is made against specific persons and they are known;
- Other personal data provided by the whistleblower in relation to the description of the breach.

4. Grounds for processing personal data

The controller processes personal data on the basis of the fulfilment of a legal obligation arising from the provision of Art. 1(3) of the Whistleblower Protection Act, which implements the requirements of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of whistleblowers. For some purposes, we may rely on our legitimate interest or the legitimate interest of third parties. Read more about that in the next section.

4.1. Recipients of personal data

The identity of the whistleblower and any other information from which his or her identity may be known, directly or indirectly, may be disclosed only where this is a necessary and proportionate obligation imposed by Bulgarian or European Union law in the context of investigations by national authorities or judicial proceedings, including with a view to ensuring the right of defence of the person concerned. This may include disclosure to the national external whistleblowing authority, the Data Protection Commission. Disclosure to other public authorities within the scope of their statutory powers in relation to the subject matter of the report shall only be admissible on the basis of the consent of the whistleblower.

Within the controller's organisation, only designated authorised persons have access to personal data, and then only if it is relevant to the performance of their duties. Within KBC Asset Management and within the KBC Group, your personal data that is collected and processed through the Platform may only be accessed by designated units and employees who are identified in the Whistleblower Protection Policy.

These persons are bound by a strict professional duty of confidentiality and an obligation to comply with all technical instructions to ensure the confidentiality of your personal data and the security of the systems on which the data is stored.

The services of data processors may be used in connection with the use and maintenance of the Platform. These are companies that process data on the instructions of the controller and under strict written conditions in accordance with European data protection requirements.

KBC Asset Management, as part of a group of companies, also has a number of legitimate interests that are the basis for processing personal data. In this regard, we ensure that the impact on your privacy is minimised and that in any case the legitimate interests of the controller or third parties remain proportionate to the impact that maintaining them has on your privacy. If you nevertheless object to this data being processed, you may exercise your right to object by following the instructions on exercising data subjects' rights which you will find in this document.

There are various situations in which personal data may be processed at KBC Asset Management on the basis of a legitimate interest:

- Personal data can be used as evidence (stored records).
- To establish, exercise and defend the legal rights of KBC Asset Management or those it represents (e.g. in disputes).
- Personal data may be used for risk management and control of KBC Asset Management and KBC Group, including dispute management, prevention and investigation of money laundering and fraud, inspection.

4.2 Retention period of personal data

The reports and the materials attached to them, including the subsequent documentation related to their examination, shall be kept for a period of 5 years after the completion of the examination of the report, unless there are criminal, civil, labour and/or administrative proceedings initiated in connection with the report.

5. What you can do if you disagree with the way we process your data

The secure and lawful processing of your data is our priority. If you have any concerns or if you are dissatisfied with the way we process your data, we will be happy to discuss your feedback sent to the above correspondence addresses. Please note that our activities relating to the processing of your personal data are subject to the control of the Data Protection Commission, to whom you have the right to apply if you are not entirely satisfied with our actions and responses.

Information on Bulgarian and European legislation on personal data protection and protection of whistleblowers is available on the website of the Commission for Personal Data Protection: www.cpdp.bg.