

PRIVACY POLICY
OF
EUROPA INVESTMENT FUND MANAGER PRIVATE COMPANY LIMITED BY SHARES

on the processing of personal data related to complaint handling process and establishing contact

Introduction:

EUROPA Investment Fund Manager Private Company Limited By Shares (hereinafter referred to as: Data Controller), is providing the following information in connection with complaint handling and communication - with regard to decree 2016/679 of the European Parliament and of the Council (EU) (hereinafter: GDPR) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and also repealing Directive 95/46/EC:

The person appointed to be in charge of carrying out the tasks related to Data Protection

Name: EUROPA Investment Fund Manager Private Company Limited by Shares

Registered Office: door 1, floor 1, No 3-5 Bécsi Road Budapest Hungary 1023

Contact Details of the Data Protection Officer:

Name: Ildikó Marik

Address: door 1, floor 1, No 3-5 Bécsi Road Budapest Hungary 1023

Phone number: 06-1-577-4244

Telefax: 06-1-225-2501

E-mail address: ildiko.marik@europaalap.hu

Purpose of Data Processing:

To inquire, manage and record complaints related to services of the Data Controller, and to get contact with the Data Controller in accordance with the legal regulations related to the Data Controller.

The legal basis for data processing:

Based on point c) of paragraph (1) of article 6 of GDPR, the legal basis of data processing conducted for the reasons formulated above is compliance with legal obligation of §121 of Act CXXXVIII of the year 2007 on Investment companies and service providers for the Commodity Exchange and also on the Rules governing the activities these can conduct, and also of government decree number 437/2016. (XII.16.), and of decree number 66/2021. (XII.20.) of the National Bank of Hungary (MNB), and also of recommendation number 16/2021. (XI.25.) of the National Bank of Hungary (MNB).

Scope of Affected Individuals:

The Data Controller's clients, potential clients, or any adult natural person who submits a complaint or contacts the Data Controller through any of its available contact channels regarding other matters.

Categories of processed Data:

The personal data processed for the purpose formulated above may include, in particular: data of the individual suitable for identification, disclosure of a complaint, additional personal data, specification and description of the

event or fact, subject matter of the complaint and contacting, the date of submission of the complaint or that of getting into contact, the manner of submission and resolution of the complaint, voice recordings in case of getting into contact or submitting complaints by telephone, the reasons for any potential rejection of the complaint, the date of response of it, and any further information provided in the course of the submission of the complaint or contacting.

Source of Personal Data:

The source of the personal data is the affected individual who provided the data when submitting the complaint or when getting in contact.

Duration of Data Processing, data retention period:

Data Controller is obliged to retain the complaint received and the response provided on it for a period of five years counted from the date of the investigation result or, in case of other ways of contacting, from the date of getting in contact.

Third Parties, Recipients of Data, Data Processors:

Data Controller will not transfer the personal data processed for the above detailed purposes to third parties, with the exception of inquiries explicitly targeting this - of public authorities, authorised for this function by the relevant legislation. Furthermore, only those employees of the Data Controller who are in charge of investigating and responding the complaint or, in the case of other way of getting contacts, who will get in contact with the related individual, will have access to the data processed for the above purposes. The Data Controller conducts this data processing independently and does not engage any data processor.

Data Subject Rights Related to Data Processing:

You may request any of the following steps at any time, without restriction, regarding your personal data: access to information about the details of data processing, including requesting a copy, rectification with respect to inaccurate or incomplete data, deletion if there is no longer a purpose or legal basis for data handling, restriction of processing if you consider the processing to be unlawful but do not request deletion, or before a claim for data refinement has been reviewed, you also have the right to submit objection against the processing of personal data if the processing of the data is based on the Data Controller's legitimate interest. Besides this you can use your right to data portability. In case of data processing based on consent, you have the right to withdraw your consent at any time without restriction. Withdrawal does not affect the lawfulness of data processing carried out prior to the withdrawal. Based on the right to restriction we will merely store the data, however the data will not be subject of any other operation of ours. Regarding the rights to restriction and deletion, please note that in case you also have a signed contract with the Data Controller, then in most of the cases we are processing data that is required by legal regulations in the course of establishing, maintaining, and terminating the contractual relationship. These data cannot be deleted within the legally prescribed retention period. In the framework of the right to data portability, you may claim that the data you have provided should be handed over to you in a machine-readable format so that you can transfer it to another Data Controller or processor, provided that the technical and data security conditions allow it.

Possible Legal Remedies:

You may submit complaint against our data processing at our company at the email address: ildiko.marik@europaalap.hu, or at the National Authority for Data Protection and Freedom of Information, furthermore you can initiate a court case.

Right to submit complaint addressed to the supervisory authority:

Address of the Authority: 9-11 Falk Miksa street Budapest, Hungary 1055

Mailing Address of the Authority: Post Box 9 Budapest, 1363

Website of the Authority: www.naih.hu