



# Privacy statement for customer data

3.1.2024

## Use of customer data in WIP Asset Management Ltd (later WIP)

We are committed to secure your rights and protect all your personal data. This privacy statement describes how we collect, use, save, transfer, and protect our customers' personal data. In addition, we tell you in the privacy statement how you should act if you want to see what information about you is in WIP's register, how you can correct a possible error in your personal data in the register and in which cases you can prohibit us from using your personal data.

We = WIP Asset Management Ltd

You = Current/former customer or potential customer

### Collection of personal data

Personal data can be collected by the data subject himself/herself, representatives of the data subject, authorities' publicly held registers, the credit information register and by your bank. With your permission, data can also be collected from other parties within the limits of the law.

### Collected customer data

**Customer identification:** The Personal customer's name and personal identity code. The corporate customer's name, business ID, LEI number and the names and personal identity codes of the corporates' beneficial owners and members of the board of directors. We are obliged to collect and document the identification of the customer by, for example, taking a copy of your proof of identity card. In addition, we are required by law to request and update the necessary financial background information and information regarding the customer's investment experience in order to assess the suitability of the service for the customer.

**Contact information:** addresses, e-mail addresses, telephone numbers and country of residence.

**Financial data:** contract data, assets, liabilities, securities and other holdings.

**Data related to the legal obligations:** telephone calls and electronic recording, country of taxation and possible foreign tax registration number, as well as information related to the prevention of money laundering.

### Purpose of the processing of personal data

We process your personal data primarily to fulfil our asset management agreement and to manage the customer relationship. Personal data is also processed to fulfill our obligations in accordance with legislation and the authorities' regulations. Examples of legal obligations that require the processing of personal data: obligation to know our customers, prevention of money laundering, fraud and financing of terrorism and reporting to the tax authorities. Personal data is also processed for marketing, product, and customer analyses. We do not use automated decisions in our asset management.

### The group of registrants

The person/company has or has had a customer relationship or there has been a personal contact regarding establishing a customer relationship regarding our services.

### The legal transfer of personal data

We may transfer personal data to other parties such as tax authorities, service providers, your bank and to an insurance company chosen by you. If necessary, we also have the right to disclose the requested information to other authorities, such as the police. Offering asset management and fulfilling the agreement requires that your personal data be disclosed to, among others, the bank and intermediaries. Personal data will not be disclosed to third parties or persons other than those mentioned above without your explicit consent. In order to establish a customer relationship with us, personal data is required.

### **Transfer of personal data to third countries (outside the EU and EEA)**

In some cases, we may transfer personal data outside the European Economic Area (so-called third countries). The transfer of personal data can only be carried out if one of the following conditions is met:

1. The EU Commission has decided that the data security level of the country in question is sufficient.
2. We have taken other appropriate protective measures, for example by using model clauses approved by the EU Commission in the contract between us and the company that the data is transferred to or by ensuring that the company to which personal data is transferred to have binding corporate data protection rules that meet the requirements of the legislation.
3. In special cases, if this is necessary to fulfil the obligations of the asset management agreement and the client has given his/her consent to the transferred data.

If the customers' personal data is transferred to a country outside the EEA, we will inform the customer accordingly.

### **Protection of personal data**

When processing and protecting personal data, we follow the laws as well as the authorities' instructions and regulations. We have taken appropriate technical, organizational, and administrative security measures to protect the data we hold against loss, misuse, unauthorized access, disclosure, alteration, and destruction.

#### **Manual material**

Stored in locked areas. Only those persons who need the collected data for customer relationship management, ensuring internal risk management or IT maintenance have access to the premises.

#### **Electronic material**

Electronic material is stored separately from the public network with firewalls and user rights. Only those persons who need the saved data for managing customer relations, ensuring internal risk management or for IT maintenance have access to the electronic material.

All customer information is confidential in accordance with the Investment Services Act.

### **Customer's privacy protection rights**

As a data subject, you have the following rights in relation to the personal data we hold about you:

#### **Right to request access to your personal data**

You have the right to access any personal data we hold about you. You can request to see your personal data from our customer service or from our data protection officer.

#### **Right to request correction of personal data**

If the personal data is incorrect or incomplete, you have the right to request correction of the data, unless the legislation or other statute limits it.

#### **Right to request erasure**

You have the right to request that your personal data be deleted in the following cases:

1. You withdraw your consent for us to process your personal data and there is no longer any other basis for your personal data to be processed,
2. You object to the processing and there is no legitimate reason for continued processing of your personal data,
3. You object to your personal data being used for direct marketing or
4. The processing of personal data is unlawful.

As a result of financial sector legislation, WIP is in many cases obliged to store personal data about you during the time that you are a customer with us, and also thereafter in order to, for example, comply with a legal obligation or handle legal claims. In these cases, we cannot delete your personal data even if you have asked for it.

#### **Right to restrict the processing of personal data**

You can request that we limit the processing of your personal data to storage only in the following cases:

1. You object to the accuracy of the data we have registered about you,
2. You object to the legal basis for the processing of the data,
3. You exercise your right to object to the processing of the data,

4. You do not have the right to request that we delete the data we have on you, or
5. The information we have registered about you is only needed to make a legal claim.

In these cases, the processing is limited to storage only until the accuracy of the data has been confirmed, or until it can be established whether our legitimate interest takes precedence over your interests.

You always have the right to object to the processing of your personal data for direct marketing purposes.

#### **Right to data portability**

You have the right to receive an extract of the personal data we have stored about you.

#### **Request to exercise your rights**

Your request to exercise your rights above will be assessed on a case-by-case basis based on the circumstances. The request to exercise your rights must be made in writing to our customer service or to our data protection officer. Please note that we may also store and use your information if necessary to comply with legal obligations, resolve disputes and enforce contracts.

#### **Storage period for personal data**

We save your personal data for as long as it is necessary for the purposes for which it was collected and processed or as long as required by law and regulation. This means that we save your data for as long as it is necessary to execute an agreement and as long as applicable minimum storage time requirements in laws and other regulations are required. In cases where we store your data for a purpose other than to execute an agreement, for example for requirements regarding the fight against money laundering, accounting, and requirements according to the capital adequacy rules, we only store the data if it is necessary and/or it is required for the purpose in question according to laws and other regulations.

Examples of customer data storage periods:

- Prevention, detection and investigation of money laundering, fraud, and terrorist financing: at least 5 years after termination of customer relationship
- Information on the execution of an agreement: 10 years after the end of the customer relationship for

the purpose of providing evidence in the event of any claims.

#### **Cookies**

We collect, process, and analyze data about the use of our website ([www.wip.fi](http://www.wip.fi)). Online traffic generates data related to website visitors and data processed in computer networks to send, distribute or make messages available. We use cookies to track the website's user count and the website's analytics. You can specify in your browser settings if you do not want to allow cookies.

#### **Contact WIP or the Data Protection Authority**

If you have any questions regarding our privacy policy or the customer register, please contact customer service. You can also file a complaint or contact the Office of the Data Protection Ombudsman.

#### **WIP Asset Management Ltd's customer service**

Phone: 09 6122 830

E-mail: [wip@wip.fi](mailto:wip@wip.fi)

Website: [www.wip.fi](http://www.wip.fi)