
PRIVACY NOTICE

/for customers who are physical persons, physical persons representing and/or being members of managing and controlling bodies of customers-legal entities, physical persons who are authorized representatives of customers- physical persons or legal entities, physical persons who are actual owners of customers-legal entities/

WHO ARE WE AND HOW CAN YOU GET IN CONTACT WITH US? „EF ASSET MANAGEMENT“ AD (“**The Company**”, “**We**”, “**Us**”) is a company established in accordance with the laws of the Republic of Bulgaria, UIC 131422901, with headquarters and address of management: city Sofia 1592, region Iskar, 43 „Christopher Columbus“ blvd., tel.: (+359 2) 9021944, e-mail: office@efam.bg, for the purpose of personal data protection: dpo@efam.bg, Internet site: www.efam.bg. „EF ASSET MANAGEMENT“ AD holds a licence № 17-УД/09.03.2006 of the Financial Supervision Commission (FSC) to implement activity as as managing company, subsequently amended by licence № 59-УД/ 13.09.2017r. The official who is in charge of personal data protection in „EF ASSET MANAGEMENT“ AD is Natalia Ivanova Popova, with contact details: city Sofia 1592, region Iskar, 43 Christopher Columbus Blvd., e-mail: dpo@efam.bg, tel.: (+359 2) 9021944.

FOR WHAT PURPOSES DO WE PROCESS YOUR DATA? „EF ASSET MANAGEMENT“ AD is an administrator of your personal data. We shall collect and use those personal data which you submit to us and/or the ones we have obtained from other sources (for instance the Commercial Register and the Register of Non-profit Legal Entities at the Registry Agency, etc.) for the purposes specified below:

- For your identification when you enter into a contract with us, and, respectively, for the identification of a legal entity of which you are a representative, a member of a management or control body and/or an actual owner, upon the conclusion of a contract between us and the legal entity, or for the identification of a legal entity or a physical person that you are an authorized representative of, for the purpose of establishing contractual relationships between us and the respective legal entity or physical person;
- • For the performance of the contract concluded between you and us, respectively, for the performance of the contract concluded between us and the legal entity of which you are a representative, a member of a managing or controlling body and/or an actual owner, or for the performance of the contract concluded between us and the legal entity or the physical person whose authorized representative you are, and for the maintenance of partnership relationships regarding the contracts concluded, as well as for carrying out subsequent communication between us in connection with the performance of the respective contract and the provision of the services and/or activities relating thereto;
- • For implementing and maintaining the necessary accounting records connected with the performance of the contract concluded between you and us, respectively, connected with the performance of the contract concluded between us and the legal entity of which you are a representative, a member of a managing or controlling body and/or an actual owner or for the performance of the contract concluded between us and the legal entity or the physical person whose authorized representative you are, and the provision of the services and/or activities relating to the respective contract;
- • For entering your data into our client database as a customer-physical person, respectively as a representative, a member of a managing or controlling body and/or an actual owner of a customer-legal entity or as an authorized representative of a customer that is a legal entity or a physical person;

- For submitting updated information about the products of "EF ASSET MANAGEMENT" AD and the news relating to us, as well as information of advertising content concerning our products and services by way of an SMS, an e-mail or through the post (direct marketing) in case where your explicit consent thereto is available.

WHAT ARE THE PERSONAL DATA OF YOURS THAT WE PROCESS? In order to achieve the objectives specified above, in those cases where that applies and depending on the quality in which you act – a customer - physical person, a representative and/or a member of a managing or controlling body of a customer - legal entity, an authorized representative of a customer - physical person or legal entity, an actual owner of a customer - legal entity, we shall process the following data of yours: name; Personal number /an official personal identification number or some other unique element for ascertaining the identity, which is shown in an official document of identity with a validity term that has not expired and with your photo on it/; the date and place of birth; citizenship; country of permanent residence and address; mailing address; country of which you are a local person for tax purposes, number of the identity document, the date of issue and the date of validity; a copy of the identity document; e-mail address; contact phone numbers; data from a notary certified power of attorney or a copy of a notary certified power of attorney; the said PoA, or, respectively, the copy of the PoA shall have to be kept in the records of the Company; a document in original issued by a credit institution upon remote contracting; a document, including credit and / or debit card information issued by a credit institution, data contained in a qualified electronic signature, upon remote contracting; Bank account; marital status; information on the political, public position and other statutory positions, incl. those under the Law on Measures against Money Laundering, documents and information. If you opt for submitting to us any additional information, we shall use it as much as it is relevant to the fulfilment of the processing purposes.

Personal data can as well be collected by using “cookies”, which are considered in the [Policy on using "cookies"](#), which is available on the Internet site of "EF ASSET MANAGEMENT" AD and you can become familiar with it at any time.

WHAT ARE THE GROUNDS ON WHICH WE PROCESS YOUR PERSONAL DATA? The legal grounds for processing the aforesaid personal data is undertaking steps for concluding a contract with you, or with the legal entity of which you are a representative or a member of a managing or controlling body and/or an actual owner, or with the physical person or the legal entity of which you are an authorized representative, and the subsequent performance of the concluded contract, as well as our legitimate interest in identifying our customers beyond doubt and establishing relationships with reliable third parties only. The legal grounds for processing your data relates to our legal obligation to collect and keep such data in accordance with the The Law on the Activity of Collective Investment Schemes and other Collective Investment Undertakings and Ordinance No 44 of 20.10.2011 on the requirements to the activity of the collective investment schemes, the managing companies, the national investment funds and the persons managing alternative investment funds, the Law on the Markets in Financial Instruments, the Law on Measures against Money Laundering and the acts of subordinate legislation relating thereto, as well as other relevant legal acts. In the event that you refuse to submit your personal data, it would be impossible for us to conclude a contract with you, or with the legal entity of which you are a representative, a member of a managing or controlling body and/or an actual owner, or with the physical person or the legal entity of which you are an authorized representative.

PROFILING Your data shall be processed both manually and with automatically and regarding your personal data "EF ASSET MANAGEMENT" AD shall not apply automatic decision making and profiling.

WITH WHOM CAN WE SHARE YOUR PERSONAL DATA? The information concerning your personal data in relation with the implementation of the contract concluded with you, or with the legal entity you are representing, a member of a managing or controlling body and/or an actual owner, or with the physical person or the legal entity you are representing, and in connection with the provision of investment services and activities performed on the grounds of the contract can be transferred to Bulgarian and foreign /a Member State of the European Union or the European Economic Area or third countries/ trustee banks, depository institutions and subcontractors of "EF ASSET MANAGEMENT" AD, related to the implementation of the relevant investment services and activities. We can also share your personal data with some third parties, such as: companies acting as our subcontractors for the purpose of performing the contract concluded; IT providers for the purpose of development and technical maintenance of our electronic systems; auditors and consultants who have to verify the compliance, on our part, with the external and internal standards and requirements; state bodies, executive agencies and parties to disputes, in accordance with the legal obligation to report, or in case of lodging claims; a legal successor or a business partner of "EF ASSET MANAGEMENT" AD in those cases where we sell or establish a joint venture for the whole of our business or a part thereof.

FOR WHAT PERIOD OF TIME DO WE STORE YOUR PERSONAL DATA? We shall keep your personal data for a specified period of time the length of which complies with the applicable Bulgarian and European legislation, and the internal policies and procedures of "EF ASSET MANAGEMENT" AD, for as long as that is necessary for the implementation of our obligations as set out in law, and satisfying our legitimate business interests, or the occurrence, exerting or protecting our rights. When it is no longer necessary to process your personal data for the said purposes, the personal data shall be securely deleted.

HOW DO WE PROTECT YOUR PERSONAL DATA? The security of the data you have entrusted to us is very important to us. We therefore protect your data by applying all the appropriate technical, physical and organizational means at our disposal to prevent unauthorized access, unauthorized or malicious use, loss or premature deletion of information. We have adopted the necessary internal rules and policies. Our employees are aware of the requirements regarding the protection of your personal data. Processing is reduced to the minimum of data needed to achieve the relative goals. The main provisions for personal data protection applied by "EF ASSET MANAGEMENT" AD are as follows:

- provisions for physical protection: controlled access to the office of "EF ASSET MANAGEMENT" AD; lockers with locks, room equipment and fire extinguishers; prohibition on the misappropriation of documents containing personal data; a separate server room in which the elements of the communication and information systems for personal data processing are located and the room is locked and controlled;
- provisions for personal protection: knowledge of the legal framework in the field of the personal data protection by all employees; training employees about the dangers that would lead to breaches in personal data security; obligation for non-dissemination of personal data, undertaken by all employees;
- provisions for document protection: preparation of a register of the processing of personal data activities and the bringing to the attention of the responsible employees; introducing rules regarding the lawful processing of personal data; preparing assessments of the impact of the processing of personal data on high-risk processes, if any; setting deadlines for the storage of personal data and establishing rules of action after the expiry of storage periods;
- provisions for technical protection: encryption, pseudonymisation and anonymization of the collected personal data; identification and authentication of the information systems through unique user name and password for every employee; introducing different levels for access to the information systems; use

of specialized software to protect the information systems from viruses; producing copies and backups for recovering data sets; special testing and checking the capabilities of introducing a new personal data processing software to determine whether the software product provides maximum protection of personal data against unauthorized access, loss, damage or destruction;

- other provisions defined in the internal policies and procedures of "EF ASSET MANAGEMENT" AD.

WHAT ARE YOUR RIGHTS WITH REGARD TO YOUR PERSONAL DATA? You can get in touch with "EF ASSET MANAGEMENT" AD and our official who is in charge of personal data protection - Natalia Ivanova Popova - at the headquarters address of the company in the city of Sofia 1592, region Iskar, 43 "Christopher Columbus" or by e-mail: dpo@efam.bg, in order to request to exert the following rights of yours: right of access to those personal data which "EF ASSET MANAGEMENT" AD keeps for you, right to correct your personal data in case of imprecision and/or incompleteness, right to delete your personal data, right to limit data processing, right to make an objection against the processing of your personal data, right to withdraw your consent where the processing is based thereupon, right to have your data transferred to another administrator of personal data under certain conditions. If the said request places "EF ASSET MANAGEMENT" AD in a situation of violating our obligations in accordance with the operative Bulgarian and European legislation and the internal policies and procedures of "EF ASSET MANAGEMENT" AD, maybe we shall not be able to comply with the said request. In the event that your request has been filed via E-mail to the E-mail address specified above, the request must be signed with a qualified electronic signature. A standard form of the request for exerting of rights is available on the Internet site of "EF ASSET MANAGEMENT" AD, in case you are willing to make use thereof.

You are entitled to lodge a complaint concerning the processing of your personal data by "EF ASSET MANAGEMENT" AD, addressing it to the Personal Data Protection Commission, e-mail address: kzld@cpdp.bg.

WILL WE USE YOUR PERSONAL DATA FOR CONDUCTING DIRECT MARKETING? We shall use your personal data for the purposes of the direct marketing only after obtaining your consent thereto. You are entitled to revoke your consent at any time and to lodge an objection against the processing of your personal data for the purposes of the direct marketing, either addressing the objection to the headquarters address of "EF ASSET MANAGEMENT" AD in the city of Sofia 1592, region Iskar, 43 Christopher Columbus Blvd., or sending it via E-mail: dpo@efam.bg, and the said objection must be signed either with a qualified electronic signature or in the way specified in the advertisement material we have sent you (each advertisement message will provide you with the opportunity to raise an objection against receiving any subsequent messages). Once we have received your objection, we shall immediately stop sending you information of advertising content regarding our products and services.

WHAT CHANGES HAVE WE MADE RECENTLY IN THE PRIVACY POLICY? We reserve the right to change this Privacy Policy at any time by specifying the date on which the Privacy Policy was last updated. If there are significant changes, we will focus on them and try to warn you directly when possible. We will also keep previous versions of this Privacy Policy in an archive so that you can view them.

THE PRINCIPLE OF MAINTAINING CORRECT PERSONAL DATA AND THEIR UPDATING BY THE ADMINISTRATOR, IF NECESSARY In relation with this fundamental principle of the European legislation on personal data protection and in view of the well-established relationships between "EF ASSET MANAGEMENT" AD and you, we are kindly asking you, in case there occurs a change in the personal data you have submitted to "EF ASSET MANAGEMENT" AD, to get in touch with us in order to update the data, contacting us at the headquarters



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IS THERE ANYTHING ELSE YOU MUST KNOW? The website of "EF ASSET MANAGEMENT" AD may contain links to third party sites. These third-party sites have their own privacy policies. In case you visit those sites, you are subject to their policies.

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"EF ASSET MANAGEMENT" AD