

## PRIVACY POLICY AND PERSONAL DATA PROTECTION

**General information:** ALFI, Management of Alternative Investment Funds, Ltd. (hereinafter referred to as "the Company") pays special attention to the protection of personal and other data and handles them responsibly and in accordance with the applicable regulations. We value your privacy and process your data in a way that protects your interests, fundamental rights and freedoms.

We process personal data lawfully, fairly and in a transparent manner that ensures adequate security of personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The Privacy and Personal Data Protection Policy (hereinafter referred to as the "Privacy Policy") contains information on how the Company, as the controller of personal data, processes and protects personal data of data subjects.

**Data controller and categories of users of personal data:** The data controller is ALFI, Management of Alternative Investment Funds, Ltd., Verovškova ulica 55A, 1000 Ljubljana, registration number: 7239327000, VAT ID: 19992190 (hereinafter referred to as the "Company"), e-mail: [alfi@alfi.si](mailto:alfi@alfi.si), Phone: +386 (0) 59 059 057.

Users of your personal data are also carefully selected authorised contractual processors of the Company who can provide sufficient guarantees, including the security of the processing, and who have entered into a contract with the Company for the processing of personal data, whereby they are bound to comply with at least the same standards of processing of personal data as the Company. Contractual processors shall process the data only for the purpose of providing the contractually defined services and for no other purpose, nor shall they use the data for their own purposes or for the purposes of third parties. Contractual processors include Alfi Skladi Ltd., which, on the basis of a power of attorney, performs administrative services for and on behalf of the Company, as defined in the ZUAIS Law, as well as accounting service providers, legal and business advisory services providers, the custodian of the Fund's assets, as defined in the ZUAIS Law, IT system administrators, infrastructure maintainers, email service providers, software providers and cloud service providers (e.g. Microsoft, Google), business partners of the Company providing services related to occasional communication (e.g., suppliers and delivery providers of occasional greeting cards, small occasional gifts). On the basis of the relevant legislation, your personal data may be processed by public authorities and agencies that demonstrate a legal basis for processing your personal data.

Data subjects may, in respect of any matter relating to the processing and protection of their personal data and the exercise of their rights under the General Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), as amended and supplemented, the Slovenian Personal Data Protection Act (Official Gazette of the Republic of Slovenia 163/22; as amended and supplemented; ZVPO-2) and other relevant legislation, contact the following data protection contact person:

Name: Dejan Jelisavac, Director and Eva Mohar, Director  
Address: Verovškova ulica 55A, 1000 Ljubljana, Slovenia  
E-mail: [dejan.jelisavac@alfi.si](mailto:dejan.jelisavac@alfi.si) or [eva.mohar@alfi.si](mailto:eva.mohar@alfi.si)  
Phone: +386 (0) 59 059 057

**Personal data:** Personal data means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Types of data:** The types or categories of personal data processed by the Company depend on the purpose of the processing and the basis for the processing of personal data and are indicated or described in the forms/statements, contracts or terms of use of each service/fund documentation. The Company may obtain personal data from the data subject. The Company may also obtain personal data from third parties, in which case it will process them as the same types or categories of personal data as if it had obtained them directly from the data subject. The Company may be provided with the personal data of a data subject by a third party who enters or wishes to enter into a contractual relationship with the Company. In this case, the third party is obliged to provide the Company with the appropriate authorisation for the transfer of personal data and to notify the data subject accordingly.

The Company may also obtain personal data from third parties on their own for the purpose of verifying the accuracy of personal data. In this case, the Company shall process such data as the same types of data as if the data had been provided or should have provided to the Company by the data subject.

**Purposes and grounds for data processing:** The Company collects and processes your personal data on the basis of a business relationship with you (e.g. a subscription agreement) or for the purpose of carrying out necessary pre-contractual measures, on the basis of the applicable legislation, on the basis of our legitimate interest and on the basis of your consent. The processing of data for purposes other than those for which the personal data were originally collected is permitted only under the conditions as laid down by the applicable regulations and when it is compatible with the purposes for which the personal data were originally collected, or when such processing is provided for by applicable regulations. We will not, except as required by law, disclose your personal data to any unauthorised third party without your written consent. We process your personal data within the EU and the European Economic Area ("EEA") and do not transfer it to third countries or international organisations. We will not use your personal data for automated decision-making, including profiling. The specific legal basis and purposes of the processing of personal data are usually set out in the forms/statements through which the data subject provides us with personal data. In addition to this Privacy Policy, the processing of data in the context of a particular business relationship is also governed by the contract and other terms and conditions that further govern the particular contractual relationship.

**Processing on the basis of a contract:** The Company processes the personal data of data subjects for the purposes of fulfilling contractual rights and obligations and the required measures before and after the conclusion of a business relationship. If the data subject does not provide the personal data, the Company cannot conclude the contract or may withdraw from it and thus cannot fulfil its obligations in accordance with the contract. In certain cases, we may also obtain certain data from third parties or from public sources in accordance with applicable regulations. The Company may, by virtue of carrying out a lawful activity, inform users and data subjects of its services, events, training, offers and other content by sending an email to their email address. The data subject may at any time request the cessation of such communication and the processing of personal data and may cancel the receipt of communications via the unsubscribe link in the received email, by sending a request by email to [dejan.jelisavac@alfi.si](mailto:dejan.jelisavac@alfi.si) or [eva.mohar@alfi.si](mailto:eva.mohar@alfi.si) or by regular mail to the Company's address marked "request - personal data".

**Processing based on the basis of applicable legislation:** Based on the provisions of the applicable legislation, the Company processes personal data to comply with its legal obligations for the purposes prescribed by law (e.g. labour law regulations, tax regulations, regulations in the field of prevention of money laundering and terrorist financing, regulations in the field of restrictive measures introduced or implemented by the Republic of Slovenia in accordance with legal acts and decisions adopted within the framework of international organisations, regulations in the field of alternative investment funds, etc.). In the event that a data subject does not provide the Company with personal data that the Company needs to comply with its legal obligations, the Company shall not be able to enter into a business relationship with the data subject or shall withdraw from the business relationship with the data subject.

**Processing based on the basis of legitimate interest:** The Company may also process personal data on the basis of legitimate interest, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data. In the event of the application of legitimate interest, the Company shall always carry out an impact assessment in accordance with the General Data Protection Regulation and other regulations in the field of personal data, in the context of which it shall identify the legitimate interest and assess whether the interests of the data subjects whose data will be processed outweigh the legitimate business interest of the Company.

The Company processes personal data of data subjects based on a legitimate interest in accordance with this Privacy Policy and for the purposes specified below. Additional examples of processing personal data based on legitimate interest may also be provided in statements, contracts, terms and conditions, or other documents.

#### Occasional non-direct marketing communication

The Company, as part of its commitment to maintaining good business relationships and in accordance with general business practices, will occasionally engage will occasionally communicate with individuals with whom it has a business relationship. Such communication will not constitute direct marketing. Examples of such communication include sending occasional greetings and small occasional gifts to business clients. In this case, the Company will process the data person's name, the information that they are a business client of the Company, and their residential address or other address provided for shipping purposes.

The Company may engage subcontractors as processors for such occasional non-direct marketing communication, who will communicate with data persons on its behalf and disclose the aforementioned personal data to them. In this case, the Company will enter into a personal data processing agreement with such subcontractors, ensuring all necessary procedures and measures for the protection of data persons' personal data.

**Processing on the basis of consent:** The Company may also process personal data on the basis of the data subject's informed consent. By giving consent, the data subject agrees that personal and other data collected in the course of providing our services may be collected, stored and used for the purposes selected. We may process personal data for the following purposes, if the data subject gives consent:

- home address and email address for information and communication purposes;
- photographs, videos and other content relating to a data subject (e.g. posting images of data subjects on the Company's Website) for the purposes of documenting activities and informing the public about the Company's work and events;
- other purposes to which the data subject consents.

If the data subject has given his or her consent to the processing of personal data and at some point no longer wishes to do so, he or she may at any time withdraw consent to the processing of personal data by sending a request by e-mail to [dejan.jelisavac@alfi.si](mailto:dejan.jelisavac@alfi.si) or [eva.mohar@alfi.si](mailto:eva.mohar@alfi.si) or by regular mail to the Company's address marked "request - personal data". Withdrawal of consent shall not affect the lawfulness of processing based on consent prior to its withdrawal.

**Retention period and deletion of personal data:** The Company shall retain your personal data only for as long as necessary to fulfil the purpose for which the personal data was collected and processed, except where a longer retention period would be necessary or permitted by law. In accordance with anti-money laundering and tax regulations, the Company retains your personal data for 10 years after termination of a contract or conclusion of a transaction. In the event that the Company is unable to carry out all measures related to customer due diligence in accordance with anti-money laundering regulations, the Company will retain your acquired personal data for an additional 10 years. Personal data necessary for the purposes of identifying conflicts of interest shall be processed by the Company for the entire term of the fund or for a maximum period of 5 years, unless a longer retention period would be permitted by applicable regulations. Personal data necessary for the purposes of fulfilling the obligations under the Alternative Investment Fund Managers Act (Official Gazette of the Republic of Slovenia, No. 32/15, 77/18, 161/21 and 101/22 - ZOAIŠ, as amended; "ZUAIŠ") and the Act on Forms of Alternative Investment Funds (Official Gazette of the Republic of Slovenia, No. 101/22, as amended; "ZOAIŠ") shall be retained by the Company for a period of 5 years after the termination of the business relationship. For the purposes of conducting business in accordance with the Tax Procedure Act (Official Gazette of the Republic of Slovenia, No. 13/11 - official consolidated text, 32/12, 94/12, 101/13 - ZDavNep, 111/13, 22/14 - Constitutional Court Decree, 25/14 - ZFU, 40/14 - ZIN-B, 90/14, 91/15, 63/16, 69/17, 13/18 - ZJF-H, 36/19, 66/19, 145/20 - Constitutional Court Decree, 203/20 - ZIUPOPĐVE, 39/22 - ZFU-A, 52/22 - Constitutional Court Decree, 87/22 - Constitutional Court Decree in 163/22 as amended; »ZDavP-2«) in conjunction with the Foreign Account Tax Compliance Act ("FATCA"), the Company shall retain your personal data for a duration of 10 years following the conclusion of the year to which the data pertains. For the purposes of conducting business under the Tax Procedures Act in conjunction with the Common Reporting Standard in the EU ("CRS"), the Company retains your data for 5 years after the termination of the business relationship. For other tax purposes, the Company shall retain your personal data for a duration of 10 years following the conclusion of the year to which the data pertains. Personal data that is processed by the Company on the basis of the data subject's personal consent shall be kept by the Company until the consent is withdrawn or a request for deletion is submitted. Personal data obtained on the basis of legitimate interest shall be kept by the Company until any objection to the processing of personal data is upheld, unless there is a further legal basis (e.g. a contract) for their further processing. After the retention period, the Company shall effectively and permanently erase or anonymize the personal data in a way that it can no longer be linked to a specific data subject.

**Data protection and data accuracy:** The Company is responsible for information and infrastructure security (physical premises and software systems and applications). Our IT systems are protected by, among other things, antivirus software and firewall protection. We have put in place appropriate organizational and technical security measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access, and against other unlawful and unauthorized forms of processing. For specific types of personal data, we provide them in encrypted and password-protected form.

It is the data subject's responsibility to ensure that his or her personal data is provided securely and that the data provided is accurate and true. The Company shall strive to ensure that the personal data it processes is accurate and, where necessary, kept up to date, and

may from time to time contact the data subject to confirm the accuracy of the personal data or to provide new personal data (e.g. expiry of an identity document).

**Data subject rights with regard to data processing:** The data subject may at any time exercise the following rights in relation to his or hers personal data:

- to know what personal data is held by the Company and have access to it;
- to rectify or complete personal data held by te Company;
- to have personal data deleted if there is no longer a legal basis (or legal obligation) for the retention or if the data subject has given his or her consent;
- to restrict the processing of personal data (in certain cases);
- to object if processing is carried out on the basis of a legitimate interest;
- to exercise data portability (in case of a contract or personal consent and in case processing is carried out by automated means).

If you exercise your right to rectification of inaccurate personal data, we reserve the right to request documentation demonstrating the changes to be implemented. Where the data subject requests a copy of the data, he or she shall be entitled to one free copy of the personal data. We may charge a fee for additional copies in accordance with applicable regulation.

In the event of the exercise of rights, the Company may need to request certain information from the data subject to help it confirm the data subject's identity, which is only a precautionary measure to ensure that personal data is not disclosed to unauthorized persons.

If a data subject wishes to exercise any of the above rights, he or she may send a request by email to [dejan.jelisavac@alfi.si](mailto:dejan.jelisavac@alfi.si) or [eva.mohar@alfi.si](mailto:eva.mohar@alfi.si) or by regular mail to the Company's address marked "request - personal data". The Company shall respond to a request concerning the rights of a data subject without undue delay and in any event within one month of receipt of the request. Should this deadline be extended (by up to two additional months), taking into account the complexity and number of requests, the data subject shall be informed.

To exercise their rights, data subjects can use the Information Commissioner's form, which is available on their website. Link:

<https://www.ip-rs.si/obrazci/>

If a data subject has any questions regarding the processing and protection of his or her personal data, he or she may always contact the Company by e-mail at [dejan.jelisavac@alfi.si](mailto:dejan.jelisavac@alfi.si) or [eva.mohar@alfi.si](mailto:eva.mohar@alfi.si) or by regular mail to the Company's address marked "request - personal data".

Complaint: if you feel that we are not exercising your rights properly, we will be happy to hear from you in the first instance. If this is not enough, you can lodge a complaint or report with the Information Commissioner of the Republic of Slovenia.

**Publication of changes to the Privacy Policy:** This Privacy Policy shall be published on the Company's Website: <https://www.alfi.si/alfi/politika-zasebnosti-piškotki>. This Privacy Policy may be amended or supplemented at any time. Notice of changes shall be published on this Website, so we recommend that you come back regularly. By using the Website, users acknowledge that they accept and agree to the entire content of this Privacy Policy.

**Cookies:** The Company's Website functions with the help of cookies. A cookie is a file that stores website settings. Websites store cookies on users' devices in order to identify individual devices and the settings used by users to access the websites. Cookies allow

websites to recognize if a user has already visited a website. For advanced applications, they can be used to adjust individual settings. Their storage is under the full control of the browser used by the user, which can restrict or completely disable the storage of cookies if desired.

Cookies are essential for providing personalized and user-friendly online services. They are used to store information about the status of a website, help collect statistics about users and website traffic, etc. We use cookies to evaluate the effectiveness of our website design.

The Company's Website uses the following cookies:

Cookie name	Duration	Function
PHPSESSID	The cookie is deleted when closing your browser	The cookie is essential for the site to work - always installed

The cookies stored by the browser can be deleted (instructions can be found on the web pages of each browser).

We do not collect or store personal data from visitors to the <https://www.alfi.si/alfi> website.

This Privacy Policy shall come into force on 2 November 2023. Upon its entry into force, the Privacy Policy in force since 10 May 2021 shall cease to apply.

ALFI Ltd.