



## PRIVACY POLICY (INFORMATIONS FOR INVESTORS, CLIENTS AND DELEGATES UNDER ARTICLE 58 OF ZUAIS REGARDING THE PROCESSING OF PERSONAL DATA)

(last updated: March 2025)

*ALFI PD, Management of Alternative Investment Funds, Ltd, Verovškova ulica 55a, 1000 Ljubljana (»Controller«), as a Manager of Alternative Investment Fund in accordance with the Alternative Investment Fund Managers Act (Official Gazette of the Republic of Slovenia, No.32/15, as amended; »ZUAIS«) respects individual's right to privacy and handles personal data responsibly, in accordance with Personal Data Protection Act in force (»ZVOP-2«) and 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 (»GDPR«).*

*This Privacy Policy applies to Investors in Alternative Investment Funds, managed by the Controller, as well as to Controller's and Alternative Investment Fund's business clients.*

*In this document Controller discloses all information that individuals need to be aware of regarding the processing of their personal data.*

*Investor, Client or Delegate may request more detailed information by sending a written request to the Controller's headquarters at Verovškova ulica 55A, 1000 Ljubljana, Slovenia, with the annotation "request - personal data" or by email at "[vop-alfi.pd@alfi.si](mailto:vop-alfi.pd@alfi.si)".*

### Information about the Controller

The Controller of personal data is ALFI PD, Management of Alternative Investment Funds, Ltd, Verovškova ulica 55A, Ljubljana.

The Controller has not appointed a Data Protection Officer. All questions related to the processing of personal data or the exercise of data protection rights may be sent by mail to the Controller's headquarters at Verovškova ulica 55a, 1000 Ljubljana, with the annotation "request - Personal Data," or by email to "[vop-alfi.pd@alfi.si](mailto:vop-alfi.pd@alfi.si)".

### Purposes, Types, and Retention of Personal Data

The Controller processes personal data of:

#### I. INVESTORS

##### Purposes for which the Controller processes Personal Data of Individuals:

- A. **Conclusion, execution, and termination of an investment agreement**, which includes but is not limited to: preparation for concluding the investment agreement, signing the investment agreement, communication with the investor, capital call, unit transfer, unit payout, dividend payment, informing investors about asset valuation and calculated unit value of the fund, and informing about other significant events in accordance with the Fund's Management Rules. The legal basis for processing personal data is the contract (Article 6(1)(b) GDPR). If

this processing was not allowed, it would not be possible to conclude and execute the investment agreement.;

- B. **Fulfillment of obligations under ZUAIS and the Decision on defining individual terms related to marketing and marketing communications concerning units of alternative investment funds (Official Gazette of the Republic of Slovenia, No. 155/2022, "Decision")**, which mainly means processing personal data for the purpose of classifying the Investor as a professional or non-professional Investor (ZUAIS) and obtaining a foreign investor's statement on joining the fund on their own initiative (Decision). The legal basis for processing these personal data is compliance with legal obligations (Article 6(1)(c) GDPR);
- C. **Processing orders for subscription and redemption of fund units** is based on legal obligations (Article 6(1)(c) GDPR), specifically Article 65 of the Commission Delegated Regulation (EU) No. 231/2013 of December 19, 2012 as amended, and is carried out to ensure immediate and accurate recording of each order received.
- D. **Implementation of measures in accordance with the Prevention Of Money Laundering and Terrorist Financing Act (ZPPDFT-2)** and other applicable laws and regulations in the Republic of Slovenia and the European Union, including processing personal data for identification purposes, verification of investor data (periodic reviews), investor risk assessment, monitoring of suspicious transactions, clients and their related persons, collecting data on the origin of assets, particularly of politically exposed persons, and other similar actions in accordance with legislation stated above. The legal basis for processing these personal data is compliance with legal obligations (Article 6(1)(c) GDPR).
- E. **Implementation of required procedures and reporting under the Tax Procedure Act (ZDavP-2)** in connection with the Foreign Account Tax Compliance Act (FATCA) – E1, and the Common Reporting Standard (CRS) – E2. The legal basis for processing these personal data is compliance with legal obligations (Article 6(1)(c) GDPR).
- F. **Implementation of required procedures under the Act Regulation Restrictive Measures Introduced or Implemented by the Republic of Slovenia in Accordance with Legal Acts and Decisions Adopted by International Organizations (ZROUPAMO)** to verify transaction compliance with restrictive measures. The legal basis for processing these personal data is compliance with legal obligations (Article 6(1)(c) GDPR).
- G. **Investors can review business operations using the my.alfi application.** The legal basis for processing these personal data is the contract (Article 6(1)(b) GDPR). If the processing of this personal data were not allowed, it would not be possible to fulfill contractual obligations related to the use of the my.alfi application.
- H. **The transfer of investor's data and reported changes to such data to other fund managers in the group** is carried out to prevent individuals from having to repeatedly complete all documentation for application suitability verification and to avoid reporting changes to all group managers separately. The legal basis for processing these personal data is your consent (Article 6(1)(a) GDPR).
- I. **The handling of investor complaints** is based on the legal basis of the contract (Article 6(1)(b) GDPR), as the content of the complaints relates to the fulfillment of obligations by either party in the contractual relationship. If you do not wish to provide your personal data, we will not be able to process your complaint.
- J. **Occasional non-marketing communication** is based on the legal basis of legitimate interest (Article 6(1)(f) GDPR) and is carried out to maintain good business relationships.
- K. **The recording of incoming and outgoing physical mail** is based on the legal basis of legitimate interest (Article 6(1)(f) GDPR) and is conducted for the purpose of monitoring and organizing sent and received mail.

## **Types of personal data processed for the purposes stated above**

### **A. For the purpose of conclusion, execution, and termination of the contract**

A.1 Conclusion of the contract: (i) name and surname of the investor or their authorized representative (if the investor is an individual), (ii) name and surname of the legal representative or authorized representative (if the investor is a legal entity), (iii) address, (iv) tax number and personal identification number, (v) contact details, (vi) bank name and investor's bank account number;

A.1.1 If the investor acts as a special purpose vehicle (SPV) of indirect investors, the following data of indirect investors are also collected: (i) name of the SPV of indirect investors, (ii) data on the investment agreement, (iii) name and surname, (iv) address, (v) personal identification number, (vi) tax number, (vii) share in the SPV of indirect investors (%);

A.1.2 For each investor or investor's legal representative or authorized representative or other relevant person, a check of publicly available data on the internet (Google) is also carried out.

### A.2 Implementation of the investment agreement:

A.2.1 Capital call: (i) name and surname of the investor, (ii) address, (iii) tax number, (iv) data on the capital call and commitment;

A.2.2 Partial transfer of units: (i) data on the business relationship, (ii) name and surname of the investor, (iii) address, (iv) contact details, (v) tax number, (vi) personal identification number, (vii) data on fund units, (viii) data on the commitment, (ix) transaction value, (x) name of the bank and bank account number of the investor, (xi) data on the transferee;

A.2.3 Partial redemption of fund units: (i) data on the business relationship, (ii) name and surname of the investor, (iii) address, (iv) tax number, (v) status and value of fund units, (vi) commitment amount, (vii) summary of executed transactions (deposits/withdrawals), (viii) name of the bank and bank account number of the investor, (ix) data on the recipient of the payment if different from the investor;

A.2.4 Dividend payout: (i) name and surname of the investor, (ii) address, (iii) tax number, (iv) share in the fund's assets (%), (v) payout amount (gross, net);

### A.3 Termination of the investment agreement:

A.3.1 Transfer of fund units: (i) name and surname of the investor, (ii) address, (iii) contact details, (iv) tax number, (v) personal identification number, (vi) data on fund units, (vii) data on the commitment, (viii) transaction value, (ix) name of the bank and bank account number of the investor;

A.3.2 Final redemption of fund units: (i) name and surname of the investor, (ii) address, (iii) tax number, (iv) status and value of fund units, (v) amount of commitment, (vi) summary of executed transactions (deposits/withdrawals).

### **B. Implementation of obligations in accordance with the provisions of ZUAIS and the Decision**

#### **B.1 Classification of investor as professional or non-professional Investor:**

B.1.1 Classification of the investor as a non-professional investor: (i) data on the business relationship, (ii) name and surname, (iii) personal identification number or tax number;

B.1.2 Classification of an individual investor as a professional investor: (i) data on the business relationship, (ii) name and surname, (iii) personal identification number or tax number, (iv) data from the questionnaire completed by the investor;

B.1.3 Classification of a legal entity investor as a professional investor: (i) name and surname of the authorized representative/legal representative, (ii) data from the questionnaire related to the authorized representative/legal representative.

B.2 Data on a foreign investor related to Declaration on acquisition of the Fund's unit on their own initiative: (i) name and surname, (ii) address, (iii) personal identification number, (iv) tax number, (v) name of the fund, (vi) name and surname of the legal representative (if the investor is a legal entity), (vii) Declaration on acquisition of the fund's units on investor's own initiative.

C. **Processing of orders for subscription and redemption of units:** (i) name of the fund, (ii) ordering party, (iii) order recipient, (iv) date and time of the order, (v) payment terms and method, (vi) type of order, (vii) execution date of the order, (viii) number of units subscribed or redeemed, (ix) subscription/redemption price, (x) total subscription or redemption value of units, (xi) gross order value including commission or net value excluding commission.

D. **Implementation of measures in accordance with the provisions of ZPPDFT-2:**

D.1 Data on the investor (if the investor is an individual), data on the legal representative (if the investor is a legal entity), and data on the authorized representative (if applicable): (i) name and surname, (ii) address, (iii) birth details, (iv) tax number, (v) personal identification number, (vi) personal identification document details, (vii) citizenship, (viii) data on the business relationship, (ix) transaction details, (x) information on the origin of assets/funds, (xi) data on political exposure;

D.2 Data on the beneficial owner (if the investor is a legal entity): (i) name and surname, (ii) address, (iii) date of birth, (iv) citizenship, (v) tax number, (vi) manner and scope of control over the legal entity, (vii) data on political exposure.

E. **E1 – Implementation of procedures and reporting in accordance with ZDavP-2 and FATCA:** (i) name and surname, (ii) address, (iii) identification number, (iv) U.S. citizenship (YES/NO), (v) U.S. taxpayer status (YES/NO), if the individual is subject to mandatory reporting:

E.1.1. Data on the beneficial owner (Form W-8BEN): (i) name and surname, (ii) citizenship, (iii) address, (iv) U.S. taxpayer identification number, (v) foreign tax identification number, (vi) indication if the person is not required to obtain a foreign tax identification number, (vii) reference (e.g., relevant bank account), (viii) date of birth, (ix) information on tax benefits under a treaty with the U.S. and other details required by the applicable form.

E.1.2. Data on the beneficial owner (Form W-8BEN-E): (i) name and surname, (ii) address, (iii) taxpayer identification number, (iv) country of tax residency and other details required by the applicable form;

E.1.3 Data on an individual/sole proprietor (Form W-9): (i) name and surname, (ii) address, (iii) designation as an individual or sole proprietor, (iv) social security number or employer identification number, (v) other details required by the applicable form.

**E2 – Implementation of reporting in accordance with CRS:** (i) name and surname, (ii) address, (iii) date, place, and country of birth, (iv) contact details of the controlling person, (v) country of tax residency, (vi) taxpayer identification number of the country of residence (slovenian/foreign), (vii) if the taxpayer identification number is not available, one of the two given reasons must be selected and explained with appropriate documentation, (viii) indication of whether the account is reportable under CRS (YES/NO).

- F. **Verification of transaction compliance with restrictive measures:** (i) name and surname of the investor,(ii) country,(iii) address,(iv) date of birth,(v) compliance with restrictive measures.
- G. **Use of the myalfi Application:**
  - G.1 For access allocation: (i) username,(ii) password.
  - G.2 For application management and updating: all data and documentation necessary for concluding, executing, and terminating the investment agreement, as well as related reporting, complaints, etc., are recorded, maintained, and stored in the application—considering the full range of personal data listed under the chapter "Investors" in this document.
- H. **The transfer of investor's data and reported changes to such data to other fund managers in the group:** (i) Information on the given or refused consent of the individual for transferring data from the "Investor Information" form and its updates to other administrators within the ALFI group.
- I. **Handling Investor complaints:** (i) name and surname of the investor, (ii) date and method of complaint receipt, (iii) content of the complaint, (iv) date and type of decision, (v) date and method of decision notification.
- J. **Occasional non-marketing communication:** (i) name and surname, (ii) indication that the person is a business client of the manager or the fund or fund, (iii) email or address.
- K. **Recording of incoming and outgoing physical mail:** (i) name and surname, (ii) address, (iii) date of sending, (iv) date of receipt, (v) method of sending, (vi) subject of the mailing.

#### **Data retention periods**

- A. Conclusion, implementation, and termination of the investment agreement: – 10 years after the termination of the business relationship or completed transaction, except for personal data related to communication not linked to the conclusion and execution of the agreement, which is stored for 5 years after the termination of the business relationship or completed transaction.
- B. Implementation of obligations in accordance with the provisions of ZUAIS and the Decision: 10 years after the termination of the business relationship or completed transaction.
- C. Processing of orders for subscription and redemption of units: 5 years from the completion of the order.
- D. Implementation of measures in accordance with the provisions of ZPPDFT-2: 10 years after the termination of the business relationship or completed transaction.
- E. Implementation of procedures and reporting in accordance with ZPPDFT-2, FATCA, and CRS: 5 years after the end of the year in which processing was conducted.
- F. Verification of transaction compliance with restrictive Measures: 5 years after the end of the year in which processing was conducted.
- G. Use of the myalfi application: Until the termination of the business relationship.
- H. The transfer of investor's data and reported changes to such data to other fund managers in the group: Until consent is revoked or the purpose is fulfilled.
- I. Handling investor complaints: 5 years after the resolution of the complaint or the conclusion of any administrative or judicial proceedings.
- J. Occasional non-marketing communication: 3 months after the occasional communication is conducted or until the individual objects.
- K. Recording of incoming and outgoing physical mail: 5 years after the end of the year in which processing was conducted.

If data from any section is obtained from a copy of an identification document, such a copy is destroyed immediately after the data is collected.

## II. CLIENTS

### i) Suppliers and service providers

#### Purposes for which the Controller processes personal data of individuals:

- A. Processing of data necessary for the **conclusion and execution of the cooperation agreement** is based on a contract (Article 6(1)(b) GDPR). Without processing such personal data, it would not be possible to conclude or execute the business for which the cooperation agreement was made.
- B. **Determining the (non-)existence of a conflict of interest** between the interests of the client, their related persons, management, employees, and beneficial owners on one side, and the interests of the fund or investors in the fund on the other side is based on the legal obligation (Article 6(1)(c) GDPR) from ZUAIS and is conducted for the purpose of identifying, managing, monitoring, and disclosing conflicts of interest.
- C. **Recording issued and received invoices/delivery notes/purchase orders** for the purpose of regulating rights and obligations arising from business relationships. Processing for this purpose is based on a contract (Article 6(1)(b) GDPR). Without processing such personal data, it would not be possible to conclude or execute the business for which the cooperation agreement was made.
- D. **Occasional non-marketing communication** is based on legitimate interest (Article 6(1)(f) GDPR) and is conducted to maintain good business relationships.
- E. **Recording incoming and outgoing physical mail** is based on legitimate interest (Article 6(1)(f) GDPR) and is conducted for the purpose of monitoring and organizing sent and received mail.

#### Types of personal data processed for the purposes mentioned above

- A. **Conclusion and execution of a cooperation agreement:** (i) name and surname, (ii) job title, (iii) telephone number, email, address, and/or other contact addresses, (iv) name of the bank and account number of the client, if there is an obligation to make a payment to the client based on a contract or other legal transaction, (v) data on any termination proceedings (insolvency proceedings, liquidation).
- B. **Determining the (non)existence of conflicts of interest:**
  - B.1 Clients who are natural persons, as well as management and employees of a client who is a legal entity, and their related persons or third parties (related persons and third parties only in the case of specific circumstances), other creditors (co-signers): (i) name and surname,(ii) employment details,(iii) indication of the presence or absence of circumstances that may cause a conflict of interest (as listed in the declaration of (non)existence of conflicts of interest completed by the individual), (iv) description of circumstances, if they exist,(v) date of occurrence/discovery of the conflict of interest, (vi) date and person who reported/discovered the conflict of interest,(vii) determination of whether it is an actual or potential conflict of interest, (viii) identification of the parties affected by the conflict of interest,(ix) indication of the need for measures to eliminate or manage the conflict of

interest and definition of necessary measures, (x) record of personal transactions, permissions, and prohibitions related to them,(xi) date of termination of the conflict of interest,(xii) data on the completion/non-completion of the declaration of conflicts of interest.

**B.2 Clients and other creditors (co-signers) who are legal entities:** (i) name and surname of the legal representative,(ii) indication of the presence or absence of circumstances that may cause a conflict of interest (as listed in the declaration of (non)existence of conflicts of interest), specifically related to management, employees, and related persons, (iii) description of circumstances, if they exist, (iv) date of occurrence/discovery of the conflict of interest, (v) date and person who reported/discovered the conflict of interest, (vi) determination of whether it is an actual or potential conflict of interest, (vii) identification of the parties affected by the conflict of interest, (viii) indication of the need for measures to eliminate or manage the conflict of interest and definition of necessary measures, (ix) date of termination of the conflict of interest, (x) data on the completion/non-completion of the declaration of conflicts of interest.

- C. **Recording issued and received invoices/delivery notes/purchase orders:** (i) name and surname, (ii) company name, (iii) address or registered office, (iv) tax number, (v) invoice amount, (vi) type of service provided, (vii) date.
- D. **Occasional non-marketing communication:** i) name and surname,(ii) information that the individual is a business client of the controller or the fund, (iii) email or address.
- E. **Recording incoming and outgoing physical mail:** (i) name and surname, (ii) address, (iii) date of sending, (iv) date of receipt, (v) method of sending, (vi) subject of the mailing.

#### **Data retention periods**

- A. Conclusion and execution of a cooperation agreement: 5 years after termination of the business relationship.
- B. Determining the (non)existence of conflicts of interest: For the duration of the Fund or a maximum of 5 years unless a longer retention period is permitted by applicable regulations.
- C. Recording issued and received invoices/delivery notes/purchase orders: 10 years after the completed transaction.
- D. Occasional non-marketing communication: 3 months after the occasional communication is conducted or until the objection.
- E. Recording incoming and outgoing physical mail: 5 years after the end of the year in which processing was conducted.

#### **ii) Contractual partners in the purchase or sale of investments**

The Controller processes the personal data of contractual partners in the purchase or sale of investments for the same purposes, to the same extent, and for the same retention period as the personal data of suppliers and service providers mentioned in point (i) of this document. Therefore, the provisions of point (i) apply accordingly also to this point (ii). Additionally, the Controller processes the personal data of contractual partners in the purchase or sale of investments for the purposes, to the extent, and for the retention period specified below.

#### **Purposes for which the Controller processes personal data of individuals**

- A. Processing of data necessary for the **conclusion and execution of a cooperation agreement** is based on the contract (Article 6(1)(b) of the GDPR). Without processing such personal data, it would not be possible to conclude or execute the transaction for which the cooperation agreement is concluded.
- B. **Implementation of measures in accordance with the Prevention Of Money Laundering and Terrorist Financing Act (ZPPDFT-2)** and other applicable laws and regulations in the Republic of Slovenia and the European Union, including processing personal data for identification purposes, monitoring of suspicious transactions, clients and their related persons, collecting data on the origin of assets, particularly of politically exposed persons, and other similar actions in accordance with legislation stated above. The legal basis for processing these personal data is compliance with legal obligations (Article 6(1)(c) GDPR).
- C. **Implementation of required procedures under the Act regulation restrictive measures introduced or implemented by the Republic of Slovenia in accordance with legal acts and decisions adopted by international organizations (ZROUPAMO)** to verify transaction compliance with restrictive measures. The legal basis for processing these personal data is compliance with legal obligations (Article 6(1)(c) GDPR).
- D. **Implementation of required procedures under the Tax Procedure Act (ZDavP-2)** and other applicable laws and regulations in the Republic of Slovenia and the European Union, which especially involves the processing of personal data to verify the business activities of clients in non-cooperative jurisdictions and potential insolvency or termination proceedings. The legal basis for this processing is compliance with legal obligations (Article 6(1)(c) of the GDPR).

#### **Types of personal data processed by the Controller for the purposes stated above**

- A. **Data required for the conclusion and execution of a cooperation agreement:**
  - A.1 For each client or client's legal representative, guarantor, pledger, other creditor (co-signer) and other relevant persons, a check of publicly available data on the internet (Google) is also carried out.  
If guarantors and pledgers are also part of the legal transaction:
  - A.2 Data on guarantors: (i) name and surname of the guarantor, (ii) name and surname/registered name of the creditor, (iii) name and surname/registered name of the debtor, (iv) type of guarantee, (v) content of the guarantee, (vi) data on potential insolvency or termination proceedings.
  - A.3 Data on pledgers: (i) name and surname of the pledger, (ii) name and surname/registered name of the creditor, (ii) name and surname/registered name of the debtor, (iv) data on the debt, (v) data on the pledged asset, (vi) data on potential insolvency or termination proceedings.
- B. **Data required for the implementation of measures in accordance with the provisions of the Prevention of Money Laundering and Terrorist Financing Act (ZPPDFT-2):**
  - A1. Data on the client or authorized representative (if the client is a natural person) or data on the legal representatives (if the client is a legal entity): (i) name and surname or registered name, (ii) date and place of birth, (iii) identification number (optional) and tax number or foreign tax number, (iv) address or registered office and business address, (v) citizenship, (vi) personal document details, (vii) name of the bank and bank account number, (viii) client's business activity, (ix) data on the concluded contract, (x) data on political exposure, (xi) data on the client's financial status and sources of funds involved in the business relationship.



A.2 Data on the beneficial owner (if the client is a legal entity): (i) name and surname, (ii) permanent and temporary residence address, (iii) tax number, (iv) date of birth, (v) citizenship, (vi) method of control over the legal entity, (vii) information on political exposure.

A.3 Data on guarantor and other creditor (co-signer):

(i) name and surname (ii) address, (iii) tax number, (iv) date and place of birth, (v) citizenship, (vi) indicative amount of the contract/transaction and currency, (vii) details of the purpose and intended nature of the transaction/business relationship, (viii) details of the origin of the property and assets.

C. **Data required for implementation of required procedures under the Act Regulation Restrictive Measures introduced or implemented by the Republic of Slovenia in accordance with legal acts and decisions adopted by international organizations (ZROUPAMO):** (i) name and surname of the client/guarantor/other creditor(co-signer), (ii) country, (iii) address, (iv) date of birth, (v) data on compliance with restrictive measures.

D. **Data required for implementation of required procedures under the Tax Procedure Act (ZDavP-2) and other applicable laws and regulations in the Republic of Slovenia and the European Union Data:**

D.1: (i) Data on potential business operations in non-cooperative jurisdictions;

D.2:i) Data on potential termination proceedings,(ii) If the client is a legal entity, identification of persons with authority for representation, decision-making, or supervision who have a final conviction for certain criminal offenses, along with the measures taken to restrict the authorisations of such persons.

#### **Data retention periods**

- A. **Conclusion and execution of a cooperation agreement** - 5 years after the termination of the business relationship.
- B. **Implementation of measures in accordance with the provisions of the Prevention of Money Laundering and Terrorist Financing Act (ZPPDFT-2)-** 10 years after the termination of the business relationship or the completion of a transaction.
- C. **Implementation of required procedures under the Act Regulation Restrictive Measures introduced or implemented by the Republic of Slovenia in accordance with legal acts and decisions adopted by international organizations (ZROUPAMO)** -5 years after the end of the year in which the processing was conducted.
- D. **Implementation of required procedures under the Tax Procedure Act (ZDavP-2) and other applicable laws and regulations in the Republic of Slovenia and the European Union Data** - 5 years after the end of the year in which the processing was conducted.

### **III. DELEGATES UNDER ARTICLE 58 OF ZUAIS**

#### **Purposes for which the Controller processes personal data of individuals**

- A. The Controller, in accordance with the requirements of ZUAIS and Regulation 231/2013/EU, must conduct a **preliminary due diligence competency assessment** before delegating fund management services or tasks to a delegate. This assessment ensures professional, correct, timely, and independent execution of the delegated tasks. It applies to both the delegate and delegate's employees or individuals performing the delegated tasks. Additionally, the

Controller also conducts **regular and extraordinary periodic due diligence reviews**. Questionnaire, report and data processed for this purpose include: professional competencies, experience, reputation, certificates, issued by competent authorities, curriculum vitae, place of business activity, financial capability to ensure uninterrupted service execution. Legal basis for processing of these personal data is compliance with legal obligations (Article 6(1)(c) GDPR).

- B. For the conclusion and execution of the cooperation agreement the Controller processes **contact details of delegate's employees, payment-related data and data on possible termination proceedings (insolvency, liquidation)**. Legal basis for processing of these personal data is the contract (Article 6(1)(b) GDPR). Without processing these personal data, contract conclusion and execution would not be possible.
- C. **Determining the (non-)existence of a conflict of interest** between the interests of the delegate, their related persons, management, employees, and beneficial owners on one side, and the interests of the fund or investors in the fund on the other side is based on the legal obligation (Article 6(1)(c) GDPR) from ZUAIS and is conducted for the purpose of identifying, managing, monitoring, and disclosing conflicts of interest.
- D. **Recording of issued and received invoices, delivery notes and purchase orders** for the purpose of regulating rights and obligations arising from business relationships. processing for this purpose is based on a contract (Article 6(1)(b) GDPR). Without processing such personal data, it would not be possible to conclude or execute the business for which the cooperation agreement was made.
- E. **Recording incoming and outgoing physical mail** is based on legitimate interest (Article 6(1)(f) GDPR) and is conducted for the purpose of monitoring and organizing sent and received mail.

#### **Types of personal data processed by the Controller for the above-mentioned purposes**

- A. **Data required for preliminary and periodic due diligence of the delegate:** (i) full name, (ii) address, (iii) contact details, (iv) professional title and qualifications, (v) curriculum vitae, (vi) reputation and work experience, (vii) professional license issued by a competent authority, including issue and expiration dates, (viii) confirmation (yes/no) of any final criminal conviction or pending criminal/administrative proceedings for offenses related to economic crimes, labor and social security, legal transactions or property, applicable to delegates who are natural persons or employees in designated roles as required by zuais, (ix) confirmation (yes/no) of any imposed security measure prohibiting the performance of a profession for delegates who are natural persons, (x) confirmation (yes/no) whether the individual is an investor in the fund, (xi) whether the employee has a fixed salary agreement for carrying out delegated tasks, (xii) place of business activity, (xiii) financial capacity to ensure uninterrupted service execution, (xiv) other relevant data and information necessary to assess the suitability of the delegate for performing delegated services.
- B. **Employee contact details, payment- related data and data on termination proceedings:** (i) full name, (ii) job title, (iii) telephone number, (iv) contact details, (v) name of the bank and account number (if a payment obligation exists based on a contract or other legal transaction), (vi) information on any termination proceedings (insolvency, liquidation)
- C. **Data required for determining of the (non-)existence of conflicts of interest:**  
C.1 Delegates, who are natural persons, as well as management and employees of a delegate who is a legal entity, and their related persons or third parties (related persons and third parties only in the case of specific circumstances): (i) name and surname, (ii) employment details, (iii) indication of the presence or absence of circumstances that may cause a conflict

of interest (as listed in the declaration of (non)existence of conflicts of interest completed by the individual), (iv) description of circumstances, if they exist,(v) date of occurrence/discovery of the conflict of interest, (vi) date and person who reported/discovered the conflict of interest,(vii) determination of whether it is an actual or potential conflict of interest, (viii) identification of the parties affected by the conflict of interest,(ix) indication of the need for measures to eliminate or manage the conflict of interest and definition of necessary measures, (x) record of personal transactions, permissions, and prohibitions related to them,(xi) date of termination of the conflict of interest,(xii) data on the completion/non-completion of the declaration of conflicts of interest.

C.2 Delegates who are legal entities: (i) name and surname of the legal representative,(ii) indication of the presence or absence of circumstances that may cause a conflict of interest (as listed in the declaration of (non)existence of conflicts of interest), specifically related to management, employees, and related persons, (iii) description of circumstances, if they exist, (iv) date of occurrence/discovery of the conflict of interest, (v) date and person who reported/discovered the conflict of interest, (vi) determination of whether it is an actual or potential conflict of interest, (vii) identification of the parties affected by the conflict of interest, (viii) indication of the need for measures to eliminate or manage the conflict of interest and definition of necessary measures, (ix) date of termination of the conflict of interest, (x) data on the completion/non-completion of the declaration of conflicts of interest.

- D. **Data required for recording issued and received invoices/delivery notes/purchase orders:** (i) full name, (ii) company name, address, or registered office, (iii) tax number, (iv) invoice amount, (v) type of service provided, (vi) date.
- E. **Data required for recording incoming and outgoing physical mail:** (i) full name, (ii) address, (iii) date of sending, (iv) date of receipt, (v) method of sending, (vi) subject of the mail.

## Data retention periods

- A. Preliminary competency assessment and periodic reviews – 5 years after the termination of the business relationship.
- B. Contact information of employees, payment- related data and data on termination procedures – 5 years after the termination of the business relationship.
- C. Determination of (non-)existence of conflicts of interest – For the duration of the Fund or a maximum of 5 years unless a longer retention period is permitted by applicable regulations.
- D. Recording of issued and received invoices/delivery notes/orders – 10 years after the transaction is completed.
- E. Recording of incoming and outgoing physical mail – 5 years after the end of the year in which processing was conducted.

## Cookies

### 1. What are Cookies

Cookies are pieces of information that a visited website stores in the browser of the visitor's device and later retrieves to ensure continuity between different visits to the website. These include web cookies, local storage, session storage, and other techniques used by web service providers to identify users and maintain visit continuity.

## 2. Why do we need them

Cookies are essential for providing user-friendly web services. Trustworthy websites use cookies to enhance the user experience. They allow the browser to maintain your login session or remember your settings, language preferences, etc., ensuring smooth and uninterrupted use of the website.

## 3. Which Cookies do we use

The website »<https://alfi.si/slo/alfi-pd/>« and the application "my.alfi" use only cookies, essential for operation. These cookies make the website functional by enabling basic features such as site navigation, access to secured areas, language selection, font preferences, and similar functions. Without these cookies, the website would not function properly, so they cannot be disabled.

Cookie Name	Controller	Purpose	Validity	Type
elementor	ALFI PD Ltd	Stores actions performed on the website <a href="https://alfi.si/slo/alfi-pd/">https://alfi.si/slo/alfi-pd/</a>	permanent	First-party
Fb3a	ALFI PD Ltd	Automatically generated cookie for session identification in the "my.alfi" application	Session	First-party
Fe6ba	ALFI PD Ltd	Automatically generated cookie for session identification in the "my.alfi" application	Session	First-party
iconify-count	ALFI PD Ltd	Tab display settings for the "my.alfi" application menu	Session	First-party
auth.firstName	ALFI PD Ltd	Authorization mechanism operation for the "my.alfi" application	Session	First-party
auth.jwtToken	ALFI PD Ltd	User authorization for the "my.alfi" application	Session	First-party
iconify-version	ALFI PD Ltd	Tab display settings for the "my.alfi" application menu	Session	First-party
auth.lastName	ALFI PD Ltd	Authorization mechanism operation for the "my.alfi" application	Session	First-party
auth.roles	ALFI PD Ltd	Authorization mechanism operation for the "my.alfi" application	Session	First-party
authloggedin	ALFI PD Ltd	Authorization mechanism operation for the "my.alfi" application	Session	First-party
auth.username	ALFI PD Ltd	Authorization mechanism operation for the "my.alfi" application	Session	First-party
auth.email	ALFI PD Ltd	Authorization mechanism operation for the "my.alfi" application	Session	First-party

## Individuals' Rights Regarding the Processing of Personal Data

An individual may at any time exercise the following rights concerning their personal data:

- The right to be informed about and access one's personal data.
- The right to rectification or supplement personal data.

- The right to request the deletion of personal data when there is no longer a legal basis for retention (e.g., when consent is withdrawn, and no other legal obligation applies).
- The right to limit data processing in certain cases.
- The right to object to data processing if it is based on legitimate interest.
- The right to data portability, when processing is based on a contract or consent and is carried out by automated means).

If an individual exercises their right to rectify inaccurate personal data, the Controller reserves the right to request documentation proving the changes. If an individual requests a transcript or copy of personal data, they are entitled to one free copy. For any additional copies, the Controller may charge a fee in accordance with applicable regulations.

When exercising their rights, the Controller may require individuals to provide specific information to verify their identity. This security measure ensures that personal data is not disclosed to unauthorized persons.

To exercise any of the aforementioned rights, individuals may submit a request via email to »vop-alfi.pd@alfi.si« or by regular mail to the Controller's address, marked "Request – Personal Data".

Complaint Procedure: If an individual believes that the Controller is not adequately enforcing their rights, they are encouraged to first contact the Controller. If the issue remains unresolved, a complaint can be filed with the Information Commissioner of the Republic of Slovenia.

#### **Automated Decision-Making or Profiling**

The Controller does not use any system that would automatically make individual decisions or create profiles based on investors' personal data.

#### **Sharing of Personal Data with Third Parties**

The Controller treats personal data as confidential and processes it in compliance with applicable regulations. Personal data may be shared with Controller's data processors for administrative services as defined by ZUAIS, accounting services, legal and business consulting, IT system developers and maintenance providers, cloud service providers, and business partners of the Controller or the fund, who provide services related to occasional communication (e.g., suppliers and deliverers of occasional greeting cards and small occasional gifts) and postal service providers. The Controller requires all data processors to comply with at least the minimum data processing standards set by the applicable data protection laws.

The Controller also shares personal data upon request from state authorities, including but not limited to: The Office for Money Laundering Prevention, The Financial Administration of the Republic of Slovenia, The Securities Market Agency, Courts, Court-appointed enforcement officers and Other state authorities and institutions, authorized to obtain personal data under applicable regulations.

Additionally, the Controller shares personal data with the Depository of the fund's assets, as defined by ZUAIS, for the purpose of performing depository services, and with auditors for the purpose of auditing the fund's financial statements. Both the depository and the auditor act as independent data controllers when processing individuals' personal data.

The Controller only discloses the necessary personal data required by law or as explicitly requested by an authorized authority in justified cases, in compliance with applicable regulations.

### **Transfer of Personal Data to Third Countries**

The backend of the operational systems operates in the cloud, utilizing rented server capacities within the Microsoft Azure service. As a result, personal data may be transferred to a third country – the United States of America. This transfer is based on the adequacy decision issued by the European Commission, under the EU-US Data Privacy Framework (DPF).

### **General Provisions**

The Controller reserves the right to amend or supplement this Privacy Policy at any time. The latest adopted version of the Privacy Policy shall apply. The currently applicable Privacy Policy is published on the Controller's website.

In Ljubljana, March 24th 2025