

# General Data Protection Notice

## Data Protection Notice: Use of your personal data

Universal-Investment Ireland ("Universal-Investment Ireland", "we", "us" and/or "our") takes its responsibilities under applicable data protection law, including the General Data Protection Regulation (Regulation (EU) 2016/679) and implementing legislation ("Data Protection Law") very seriously. The purpose of this notice is to inform you of the data relating to you that we may collect and use and the uses (including disclosures to third parties) we may make of your data. These will depend on the type of interaction we have with you. This notice applies to all individuals with whom we have a relationship, including suppliers, service providers, business contacts and authorised representatives of our clients, excluding our employees and our clients to whom other notices apply.

Universal-Investment Ireland is the data controller in respect of your data, is a private limited company registered with the Companies Registration Office, under registration number 220548 and has its registered office at Kilmore House, Spencer Dock, North Wall Quay, Dublin 1, D01 YE64, Ireland.

Universal-Investment Ireland takes all reasonable steps, as required by law, to ensure the safety and privacy of all information and, where appropriate, enters into contracts with third party processors to protect the privacy of any personal data processed by us or on our behalf.

### 1. What information do we collect?

We may collect, have transferred to us and process data relating to you in connection with our relationship with you (and afterwards as set out below). Such data may include:

- your name, personal and contact details, including your address, e-mail address and telephone number
- information relating to our relationship with you or your employer or other person that you represent, which may include payment details, where relevant;
- information regarding your attendance at any events that we organise; and
- any other personal information that you provide to us or that we generate or otherwise obtain about you.

### 2. Purpose of processing and legal bases

Your personal data may be used by us and by third party service providers acting on our behalf for the purposes of our relationship with you including without limitation:

- managing our relationship with you or your employer or other person that you represent;
- maintaining contact details in relation to you;
- complying with our legal and regulatory obligations and also our internal policies and procedures;
- to facilitate business to business exchanges in the ordinary course of our business; and
- to facilitate audit requests.

The legal bases on which we collect, process and transfer your personal data in the manner described above are:

- where any such processing is necessary for the performance of a contract with you (or for taking steps at your request with a view to entering into a contract with you);
- that this is necessary for the purposes of legitimate interests pursued by us or a third party. We will not process your personal data for these purposes if to do so would constitute an unwarranted interference with your own interests, rights and freedoms. The legitimate interests for which we process your personal data include our legitimate interests in:
  - conducting our business in a responsible and commercially prudent manner and in the ordinary course of business;
  - pursuing our corporate objectives;
  - interacting with any potential lender to, or acquirer of, all or any part of our business and their representatives and advisers;
  - to comply with our legal and regulatory obligations; or
- your consent (where we have sought it and you have provided it to us), and in which case, you can withdraw your consent at any time.

The legal bases on which we collect, process and transfer your information, that may be regarded as a special category of data (i.e. relates to race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health, a person's sex life or sexual orientation), in the manner described above, to the extent that we do this at all, are:

- where any such processing is required or authorised under applicable employment, social security or social protection law;
- where any such processing is necessary for the purpose of (i) obtaining legal advice, (ii) establishing, exercising or defending legal claims and rights, or (iii) any legal proceedings (including prospective legal proceedings) or legal claims (including prospective legal claims);
- where any such processing of health data is necessary for the purposes of an insurance or life assurance policy, health insurance or health-related insurance or for the mortgaging of property; or
- your explicit consent (where we have sought it and you have provided it to us), and in which case, you can withdraw your consent at any time.

### **3. Sources of data**

As well as collecting information from you directly, we may also receive or obtain information relating to you from third parties, such as suppliers, customers or other business contacts or publicly available databases.

### **4. Recipients of data**

- We may disclose your information to third party recipients in connection with the above purposes, including:
  - to third parties who we engage to provide services or benefits to us or to you, such as professional advisers, auditors, insurers and outsourced service;
  - to other members of the our corporate group or affiliates;
  - to third parties, their agents and professional advisers, subject to confidentiality obligations, for the purpose of a due diligence exercise by third parties in connection with any transaction involving us or our business;
  - to competent regulatory authorities and other bodies as requested or required by law.

## 5. Retention

We will retain your personal data for the duration of your relationship with us and for such a period of time after this relationship ends as is necessary to comply with our obligations under applicable law and, if relevant, to deal with any claim or dispute that might arise in connection with our relationship.

## 6. Necessity of provision of certain information and consequences

Unless you are informed otherwise at the time when your personal data is collected, the provision of certain of your personal data, such as your contact details, may be necessary for the purpose of your relationship with us. If you do not provide us with such personal data then we may not be able to conduct our relationship with you effectively.

## 7. Transfers abroad

In connection with the above we may transfer your personal data outside the European Economic Area, including to a jurisdiction which is not recognised by the European Commission as providing for an equivalent level of protection for personal data as is provided for in the European Union. If and to the extent that we do so, we will ensure that appropriate measures are in place to comply with our obligations under applicable law governing such transfers, which may include entering into a contract governing the transfer which contains the 'standard contractual clauses' approved for this purpose by the European Commission. Further details of the measures that we have taken in this regard are available by contacting us at our address set out at the beginning of this form.

## 8. Your rights and how to update your information

You have the following rights, in certain circumstances and subject to certain restrictions, in relation to your personal data:

- the right to access your personal data;
- the right to request the rectification and/or erasure of your personal data;
- the right to restrict the use of your personal data;
- the right to object to the processing of your personal data, where we are processing it based on this being necessary for the purposes of our, or of a third party's legitimate interests;
- the right to receive your personal data, which you provided to us, in a structured, commonly used and machine-readable format or to require us to transmit that data to another controller, where we are processing the data based on your consent of that this is necessary for the performance of a contract with you; and
- the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects.

In order to exercise any of the rights set out above, you can email us at [dataprotection.uui@universal-investment.com](mailto:dataprotection.uui@universal-investment.com) or write to us at Kilmore House, Spencer Dock, North Wall Quay, Dublin 1, D01 YE64, Ireland. We reserve the right to request proof of identification to verify your identity.

Universal-Investment Ireland is required to keep all data accurate and up to date. To enable us to do this more easily, please inform us of any significant changes to your personal data, such as change of address or contact telephone numbers.

## 9. Complaints

If you are not happy with the way we have used your information or addressed your rights, you have the right to make a complaint to the Irish Data Protection Commission by e-mailing [info@dataprotection.ie](mailto:info@dataprotection.ie).

## 10. Contact us

If you have any questions or concerns regarding this notice, please e-mail us at [dataprotection.uui@universal-investment.com](mailto:dataprotection.uui@universal-investment.com).

### Contact

T +352 1 264 2600

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