

Data protection notice call recording

With the following information, we inform you about the processing of your personal data (data) and the rights to which you are entitled under data protection law.

Who is responsible for the processing and whom can you contact?

Universal-Investment-Luxembourg S.A.

15, rue de Flaxweiler

6776 Grevenmacher

E-mail: Datenschutz@universal-investment.com

You can reach our data protection officer at the following contact details:

DURY Compliance & Consulting GmbH - Obertorstraße 1 - 66111 Saarbrücken

E-Mail: datenschutzbeauftragter-uil@universal-investment.com

For what purpose is your data processed and on what legal basis?

We directly collect your data by recording and storing all incoming and outgoing telephone calls on Portfolio Management telephone lines. The recording and the associated processing of your personal data is carried out on the basis of a legal obligation (Art. 6(1)(c) GDPR in conjunction with Art. 37-1 (6a) Act of May 30, 2018 in conjunction with Article 16(6) and (7) of the Mifid II Directive (2014/65/EU) for the purpose of implementing organizational requirements.

To which categories of recipients will your data be transferred?

The transfer of data to countries outside the EU or EEA (third countries) or to international organizations does not take place and is not planned.

For the stated purposes, your personal data may be disclosed to the discussion partners, a disclosure may also be made within the framework of the legal obligations to the Luxembourg financial supervisory authority Commission de Surveillance du Secteur Financier (CSSF).

For the aforementioned purposes, we also disclose your personal data to Universal-IT Services-Gesellschaft mbH, Theodor-Heuss-Allee 70, 60486 Frankfurt am Main, Germany, which processes your data on the basis of a contract for commissioned processing pursuant to Article 28 GDPR.

In addition, we may disclose your personal data to law enforcement and other competent supervisory authorities and government agencies for the purpose of complying with applicable legal obligations.

Within Universal-Investment-Luxembourg S.A., your data will be disclosed to the departments in charge of processing, if necessary.

How long will your data be stored?

We store your personal data in accordance with legal obligations for a period of 5 years, this period may be extended to 7 years on the instructions of the Commission de Surveillance du Secteur Financier.

What rights do you have with regard to your personal data?

You have a number of rights under the GDPR which you can exercise against us. Please note that some of these rights are subject to conditions. You have the right to

- access information about your personal data,
- rectification of your personal data,
- erasure of your personal data,
- restriction of the processing of your personal data,
- object to the processing of your personal data, and
- data portability.

At the same time, you have the right to complain to a data protection supervisory authority at any time. The supervisory authority responsible for us is:

Commission nationale pour la protection des données

15, Boulevard du Jazz

L-4370 Belvaux

Tel.: (+352) 26 10 60-1

<https://cnpd.public.lu/de/support/contact/contact-prive.html>

Contact

T +352 261502-1

info@universal-investment.com

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As of Month YYYY

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