

# Data protection information for business partners

Version as of October 2023

In the present notice, we would like to explain how your personal data will be processed, and inform you of your rights as a business partner under data protection law. Business partners are esp. management companies that mandate Munich Re Investment Partners GmbH with investment management, service providers, suppliers or other interested parties. The exact type of data that will be processed, and how it will be used, depends mainly on our type of business relationship and the service provided, so that not all the following information will be applicable for every single contract.

## 1. Who is responsible for processing your data, and how can you reach the Data Protection Officer?

### Data Controller

Munich Re Investment Partners GmbH  
Königinstrasse 107  
80802 München, Germany

Telefon: +49 (89) 3891 0  
Telefax: +49 (89) 3990 56  
E-Mail: [info@munichreinvestmentpartners.com](mailto:info@munichreinvestmentpartners.com)

### Data Protection Officer

You can contact the Data Protection Officer by post at the aforementioned address (subject "Data Protection Officer") or by e-mail via the e-mail address [privacy@munichreinvestmentpartners.com](mailto:privacy@munichreinvestmentpartners.com).

## 2. Which data categories do we use and where do they originate from?

We process the personal data that you provide us in the course of our business relationship. For a legal person, we process the personal data of persons named to us acting on behalf of the legal person (representatives, contact persons). We will also process, to the extent necessary, any personal data that we legitimately obtain from public sources (e.g. company publications, media reports, internet). The respective personal data mainly includes your business contact information, your position, our business communication with you and the data this involves, and possibly your professional interests.

In those cases where we are legally obliged to carry out a KYC-check on you pursuant to Secs. 10 et seq. of the German Money Laundering Act, personal data of legal representatives, beneficial owners and persons acting on behalf of your company in particular will be processed by us on the basis of the documents provided to us by you. This includes in particular details in identification documents such as names, place and date of birth, place of residence, address and nationality.

### 3. For what purposes and on what legal basis is your data processed?

We process your personal data in compliance with the EU General Data Protection Regulation (GDPR), the German Federal Data Protection Act (BDSG), and all other applicable laws. Munich Re Investment Partners GmbH does not use automated decision making including profiling.

#### **a) To fulfil (pre-)contractual duties (Art. 6 para 1 lit. b) of the GDPR)**

Art. 6 para. 1 lit. b) is the legal basis for contracts (to be) concluded with natural persons. In these cases, the processing will be performed in the context of preparing, executing and terminating the respective business arrangement.

We will process your personal data mainly to contact you (including via video conference systems) and to communicate with you and/or your company. The data is processed primarily in our contact management system.

#### **b) For the purposes of protecting our legitimate interests (Art. 6 para. 1 lit. f) of the GDPR)**

For contracts concluded with legal persons, Art. 6 para. 1 lit. f) GDPR is the legal basis for the communication with contract-relevant contacts working for the legal person.

Where necessary, we will process personal data beyond the actual framework of our business relationship, for the purposes of legitimate interests pursued by us or a third party. Some examples of this would be:

- Sending digital or postal greeting cards to business partners, for example at Christmas or on corporate anniversaries
- Posting brochures or flyers to business partners to inform them of current Munich Re Investment Partners GmbH activities
- Obtaining contact information using publicly available sources
- Collecting data, needed to enable participation in online events (e.g. registration and chat data)
- Technical data from electronic communication and data exchange (e.g. log data)

#### **c) Based on your consent (Article 6 para. 1 lit. a) of the GDPR)**

Where you have consented to our processing your personal data for specific purposes, that constitutes the legal basis. You may revoke your consent at any time. Revoking consent applies only for the future and does not affect the validity of the data processed until the revocation.

#### **d) Based on legal obligation (Art. 6 para. 1 lit. c) of the GDPR)**

We will also process your data to fulfil our legal duties, e.g. based on Anti-Money-Laundering obligations, supervisory provisions, or to compare your data against sanctions lists to comply with counter-terrorism rules (e.g. Council Regulation 2580/2001).

### 4. Who receives your data?

Only those staff within Munich Re Investment Partners GmbH who need your data for the aforementioned purposes will have access to it.

In certain cases, we use external service providers to meet our contractual and legal duties. For example, we use service providers carrying out processing of data on our behalf in the provision of services, in particular for the provision, maintenance and care of IT systems. We have concluded corresponding data protection agreements with such service providers where required.

## 5. How do we transfer data to countries outside Europe (third countries)?

If we need to transfer personal data to service providers outside the European Economic Area (EEA), we will do so only if the European Commission has confirmed that the respective country's level of data protection is sufficient, or if data protection is otherwise sufficiently guaranteed (for example, through binding, in-house data protection provisions, or the European Commission's standard contractual clauses).

The companies in the Munich Re Reinsurance Group including Munich Re Investment Partners GmbH have adopted binding corporate rules on data protection that can be downloaded in the privacy section on the Munich Re Investment Partners GmbH website ([www.munichreinvestmentpartners.com](http://www.munichreinvestmentpartners.com)). Appropriate data protection guarantees are thus in place worldwide at those Group companies. You may obtain further information on this issue, as well as about the level of data protection at our third-country service providers, from the aforementioned contacts.

## 6. How long will your data be stored?

As a rule, we anonymise or delete your personal data as soon as it is no longer necessary for the aforementioned purpose, unless statutory documentation and retention rules (e.g. in the German Commercial Code (HGB) or Tax code (AO)) require us to keep it for longer. We will store your personal data for longer than that only in exceptional cases, where necessary in connection with claims asserted against Munich Re Investment Partners GmbH.

## 7. What privacy rights can you claim as a data subject?

You may request information on the stored data about you from the address indicated above. In addition, under certain conditions you may request that your data be deleted or corrected. Furthermore, you may also have a right to restrict the processing of your data and a right to disclosure of the data you have made available in a structured, common and machine-readable format.

If we process your data for the purpose of safeguarding legitimate interests according to Art. 6 para. 1 lit. f) GDPR, you may object to this processing to the above address if your particular situation gives grounds for objecting to this data processing. We will then stop that processing, unless it serves our overriding, compelling legitimate interests or the establishment, exercise or defence of legal claims.

## 8. Would you like to complain about how your data is handled?

If you have a complaint, you may contact the aforementioned Data Protection Officer or the state data protection authority. The authority responsible for Munich Re Investment Partners GmbH is:

Data Protection Authority of Bavaria for the Private Sector  
(Bayerisches Landesamt für Datenschutzaufsicht)  
Promenade 27  
91522 Ansbach, Germany

<https://www.lida.bayern.de>  
[poststelle@lda.bayern.de](mailto:poststelle@lda.bayern.de)

## 9. Are you obliged to provide your personal data?

The processing of contact data with business partners is necessary to perform the contract. If the data is not provided, the communication may be significantly disturbed and may mean that we are unable to enter into or perform a contract with you.