

# Data protection information for investors

Version as of November 2023

In the present notice, we would like to explain how your personal data will be processed, and inform you of your rights as an investor in our funds.

## 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?

As Munich Re Investment Partners GmbH only offers products for professional investors, the personal data processed in the course of communication between Munich Re Investment Partners GmbH and the investors is basically that of the investors' contact persons/representatives. We process the personal data that you provide us in the course of the investment in our funds or if you are interested in investing in our funds. 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 addition, Munich Re Investment Partners GmbH offers its investors a service which can be used voluntarily and which involves the processing of additional personal data. Subscriptions are generally made to the respective management company of the fund to be subscribed. For investors in our funds, however, we offer as a service to take over the communication with the management company and to forward subscription documents as well as other required documents to the management company (respectively the transfer agent), in particular proof according to the German Money Laundering Act. In this context, pursuant to Secs. 10 et seq. of the German Money Laundering Act, in particular personal data of legal representatives, beneficial owners and persons acting on behalf of the investor are processed by us via the documents provided to us for forwarding. This includes in particular information in identification documents such as names, place and date of birth, place of residence, address and nationality. The forwarding of personal data is encrypted in the case of electronic forwarding by e-mail or uploading to a server.

### 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 the subscription.

We will process your personal data (primarily your business contact information) mainly to contact you (including via video conference systems) and to communicate with you and/or the investor. 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 your 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, for example at Christmas or on corporate anniversaries
- (Electronic) brochures or flyers to inform 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.

Such consent particularly applies to

- The voluntary use of our offer to take over the communication and the exchange of data/documents with the Management Company (or the transfer agent) on behalf of the investor, in particular for subscription purposes.
- Your participation in anonymous and personalised surveys to improve the quality of our service, or in the context of events and seminars, e.g. your choice of appropriate topics or lecturers. Surveys help us adapt our means of communication, e.g. our website, to your needs. Participating in such surveys is voluntary.

- Sending newsletters to regularly inform you of relevant and interesting Munich Re Investment Partners GmbH news. In order for you to subscribe to a newsletter offered on our website, we need your email address and other information. This allows us to check whether you are the owner of the email address provided, and that you consent to receiving the newsletter. We will use your data to send you the information you request. There is an “Unsubscribe” button at the end of each newsletter that you can use to unsubscribe to the respective newsletter, or to object to the use of your data overall.
- Information about, or invitations to, events and seminars. We process your personal data to send you invitations to events that may be relevant for you and your work. When you register for a seminar or event, we send you the necessary information about it. This includes emails about the registration process, the location and program, and surveys about your experience at the seminar. We save your seminar or event registration information in our contact management system.
- Sending information on the basis of your stated interests. When you subscribe to a given newsletter, you can indicate your individual areas of interest. Using this information, we can send you more targeted information. This can take the form of a newsletter or invitations to events that may be relevant to you, for example.
- Information in personalised cookies. Where you have consented to our collating your data and creating a profile of your interests, we will save your data and interests, and collate them accordingly. We then use personalised cookies for this purpose. This allows us to recognise you personally when you use our digital media (e.g. our website), and provide you with information that is even more relevant and better tailored to you. Cookies are small files that control how our website looks and functions. They do not damage your computer and do not contain viruses. You may of course delete the cookies from your web browser at any time. Examples:
  - If you indicated that you are interested in the Internet of Things, we can send you interesting informational material about that topic, or send you a flyer. You may of course unsubscribe at any time.
  - If we can recognise your interests through personalised links in newsletters or on our website, we can provide you with even more relevant and interesting information. If you have subscribed to one of our general newsletters and click on a link in the newsletter, we recognise that this is a topic that particularly interests you. Our webpages can then be especially tailored to your needs, so that it becomes even easier and quicker for you to find the information you want.
  - If we know your interests, we can invite you to events and seminars that you may like. If we know what parts of an event or seminar you attended, we can design them better in the future, or make more appropriate information available to you. We also take voluntary surveys during and following events. Your personal feedback helps us to choose appropriate topics or presenters.
  - If you do not want us to consolidate your data (i.e. create a profile), you may refuse your consent, or revoke it later without providing a reason. If you refuse your consent, or revoke it later, we will of course not collate your information into a profile of your interests. This means that we will not be able to recognise you as someone who is interested in certain topics, and cannot send you targeted information.

We will save your personal data such as your interests and consents to receive newsletters, invitations to events and seminars, survey responses, and consents to profiling or other consents, in our contact management system. Your consents will be documented there and can be inspected at your request.

#### **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 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.

If you entrust us with the forwarding of your documents to the management company or the transfer agent, these companies will receive the required documents from us.

## **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.

Personal data/documents we forward on behalf of you to a management company/transfer agent will be deleted immediately with us after the subscription is completed.

## 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.lda.bayern.de>  
[poststelle@lda.bayern.de](mailto:poststelle@lda.bayern.de)

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

We need your personal data to carry out the services you request.