

PYN Fund Management Oy — Privacy Notice

1. General Information on the Processing of Personal Data

This Privacy Notice describes what personal data PYN Fund Management Oy (Business ID: 0665275–5) ("PYN", "the Company" or "we") collects, how we process personal data, the purposes for which the data is used, and to which parties data may be disclosed. The Privacy Notice also provides information on the obligations we comply with in the processing of personal data.

We pay particular attention to the protection of personal data. We process personal data in accordance with the EU General Data Protection Regulation (2016/679) and other applicable data protection legislation (together "data protection legislation"). Ensuring data protection is part of everything we do. "Personal data" means all information relating to a natural person ("you" or "data subject" or "individual") by which the person is or can be directly or indirectly identified, as defined in data protection legislation.

This Privacy Notice applies to all of the Company's funds and other services, as well as the Company's websites, social media services, events organised by the Company and marketing. The Privacy Notice applies to the processing of personal data of the following individuals: customers, their family members and relatives, agents, beneficiaries and representatives, prospective customers, partners and representatives of service providers, as well as job applicants and other persons involved in recruitment processes (e.g. referees).

In addition to this Privacy Notice, a separate privacy notice is maintained for PYN Fund Management Oy's fund unit register, which is available on PYN's website.

2. Data Controller and Contact Person

PYN Fund Management Oy

Address: PO Box 139, 00101 Helsinki (Annankatu 31–33 C 45)

Email: info@pyn.fi

Telephone: 09-270 70 400

www.pyn.fi

Contact person: CEO Eino Laitinen

Email: info@pyn.fi

PYN Elite Erikoissijoitusrahasto | PYN Fund Management Oy

Annankatu 31-33 C 45, Helsinki | PO Box 139, 00101 Helsinki | Tel. (09) 270 70400 | info@pyn.fi | www.pyn.fi

3. Categories of Personal Data, Data Content and Sources

We only collect personal data that is relevant and necessary for the purposes described in this Privacy Notice. The following data is collected and processed on data subjects:

Person groups	Category of personal data	Examples of data content
All persons mentioned in this Privacy Notice	Contact details	Name, address, telephone number and email address
Customers, their family members and relatives, agents, beneficiaries and representatives, prospective customers, partners and representatives of service providers	Data related to customer relationship management	Data relating to the execution of the customer relationship and contract (e.g. identification and know-your-customer data required under anti-money laundering legislation and tax procedure legislation) and data on use of services (e.g. data on fund orders, tracking data on use of electronic services, data on the customer's investor profile and notes from meetings and calls). Subscription and redemption forms used to collect data relating to contract execution are available on the Company's website (www.pyn.fi/pyn-elite/dokumentit/).
Customers, prospective customers, partners and representatives of service providers	Marketing	Marketing consents and prohibitions, data relating to the reach and engagement of electronic communications, data relating to participation in marketing campaigns, data on event attendance.
Recruitment and other persons necessary for recruitment purposes (e.g. referees)	Job applicant	Job application, CV, interviews, aptitude tests and other material gathered during recruitment, as well as data on other persons involved in the recruitment.
Customers and visitors to our website	Technical identification and behavioural data	Cookie data, IP address or part thereof, data on electronic behaviour.
Customers and prospective customers, partners, beneficiaries and representatives	Voluntary other data	Other data provided voluntarily by the data subject that is necessary, e.g. on the basis of legitimate interest.

Personal data is primarily collected directly from data subjects in connection with the establishment of a customer relationship, marketing or customer communication, recruitment, or events organised by the Company. We may also collect data from reliable public sources and registers maintained by authorities. In addition, personal data may be collected via cookies and similar technologies, and through the Company's website and other electronic applications. In connection with marketing, personal data of prospective customers may also be collected from public sources maintained by third parties.

4. Purposes and Legal Bases for Processing Personal Data

The purposes of personal data processing are: managing the contractual relationship and obligations between the customer and the Company; risk management (e.g. preparing for legal claims and other disputes); and compliance with legal requirements applicable to the Company (such as tax and accounting legislation) and obligations based on regulatory orders and guidelines, including prevention of money laundering and terrorist financing, customer identification and know-your-customer obligations, reporting and risk management obligations, and ensuring the security and data protection of PYN's services and preventing misuse.

Personal data is also processed for the purposes of customer service, managing communications and customer relationships, organising events, sales and marketing (including direct marketing), opinion or market research or other addressed communications, and developing and planning the Company's business. We process the data of recipients of electronic communications for the purpose of implementing, analysing and developing communications.

In the context of recruitment, the purpose of personal data processing is to find employees and manage recruitment processes.

The legal basis for processing personal data is the contractual and customer relationship between the Company and the data subject. Processing is also based on the Company's statutory obligations. For customer communications, service maintenance, marketing and communications, the necessary processing of personal data may also be based on the Company's legitimate interest. On this basis, we process personal data of customers and prospective customers, persons attending events, other stakeholders and job applicants. Where processing is based on legitimate interest, we have assessed that the rights and freedoms of data subjects do not override the Company's legitimate interest. For electronic direct marketing, the processing of personal data is based on the consent given by the data subject.

5. Retention Periods or Criteria for Retention of Personal Data

Personal data relating to customers and customer relationships required for the execution of a contract is retained in the customer data system as a general rule for ten years after the end of the customer relationship. Know-your-customer data processed in accordance with anti-money laundering and counter-terrorist financing legislation is retained for five years after the end of the customer relationship. After this, data is deleted or anonymised within a reasonable time, unless legislation requires the personal data to be retained for a longer period. Marketing data on persons who are not customers is retained for as long as the person has not prohibited or withdrawn their consent to direct marketing and active marketing activities are being carried out.

Data and materials relating to recruitment are retained primarily for one year from receipt of the application or from the recruitment decision.

PYN will also delete a data subject's personal data if the data subject lawfully requests the deletion of their data. However, personal data will not be deleted if legislation provides otherwise, a competent authority has initiated a process requiring the Company to retain the personal data, or another party has sought a precautionary measure in respect of the personal data.

6. Processors and Other Recipients of Personal Data

We use various service providers and partners in the processing of personal data. We ensure through contractual obligations that these parties process personal data appropriately. Parties involved in the processing of personal data may include, for example, our partners providing IT systems and financial and legal services, communication, marketing and advertising agencies, and companies providing travel, accommodation and catering services or similar partners.

Personal data is disclosed in situations required by legislation and regulatory orders, for example to the Finnish Financial Supervisory Authority (FIN-FSA) or the fund's depositary. The depositary's role is to ensure that the fund's operations comply with legislation, the fund rules and regulatory orders, and to perform other duties assigned to the depositary by legislation.

In addition, we may in emergency or other unexpected situations be required to disclose personal data in order to protect the life, health and property of individuals. We may also be required to disclose personal data to third parties if we are involved in court proceedings or other dispute resolution procedures, or in a corporate restructuring.

Further information on recipients of personal data is available upon request.

7. Transfers of Personal Data Outside the EU or EEA

Personal data processed under this Privacy Notice may be transferred outside the European Union or the European Economic Area ("EU/EEA"). Where personal data is transferred outside the EU/EEA, such transfers are made to a country for which the European Commission has issued an adequacy decision, or are carried out using appropriate safeguards, such as standard contractual clauses approved by the European Commission. Further information on transfers of personal data is available upon request.

8. Security of Personal Data Processing

The protection of personal data is part of PYN's data protection and risk management. We process personal data in a manner that aims at all times to ensure the appropriate security and data protection of personal data, including measures related to identification, protection against unauthorised processing and against accidental loss, destruction or damage. Appropriate technical and organisational safeguards are used in processing personal data, including the use of firewalls, encryption technologies and secure equipment facilities, appropriate access control and access management, and staff training.

9. Data Subject Rights Regarding Personal Data

Data subjects have the rights guaranteed by data protection legislation in respect of their personal data.

Right of access and right to inspect data	The data subject has the right to obtain confirmation as to whether their personal data is being processed. The data subject also has the right to review and see the data held about them and, upon request, to receive it in writing or in electronic form.
Right to rectification	The data subject has the right to request the correction of incorrect or inaccurate data.
Right to erasure	The data subject has the right, subject to the conditions set out in data protection legislation, to request the erasure of their data. PYN also endeavours on its own initiative to delete and correct any incorrect, unnecessary, incomplete or outdated personal data it identifies.
Right to data portability	The data subject has the right, subject to the conditions of data protection legislation, to request the transfer of their data to another data controller.
Right to restriction of processing	The data subject has the right, subject to the conditions of data protection legislation, to request the restriction of processing of personal data. Additionally, where personal data suspected to be incorrect cannot be corrected or deleted, or there is uncertainty about a deletion request, PYN will restrict access to the data.
Right to object	The data subject has the right to object to the use of their data in processing based on PYN's legitimate interest. The data subject has the right to prohibit the processing of their data for direct marketing purposes.
Right to object to automated decision-making including profiling	Data subjects have the right, in accordance with data protection legislation, to object to automated decision-making.
Right to withdraw consent	Where the processing of personal data is based on consent, the data subject has the right to withdraw the consent given. Withdrawal does not affect processing carried out prior to the withdrawal.

To exercise the rights mentioned above, please submit a request to us by post or email (contact details at the beginning of this Privacy Notice).

Please note that we will verify your identity before providing information, which means we may need to ask for additional details. We will respond to your request within a reasonable time and, where possible, within one month of the request being submitted and your identity verified.

If we cannot comply with your request, we will notify you in writing. We may decline a request (such as a request for erasure) for example due to a statutory obligation or statutory right of PYN.

10. Failure to Provide Data

If a data subject does not provide all the requested personal data, we may not be able to establish, maintain and develop a customer relationship with the data subject or the legal entity they represent, or to communicate about our services. For job applicants, failure to provide data means we are unable to consider the applicant in our recruitment process.

11. Right to Lodge a Complaint with the Supervisory Authority

The data subject has the right to lodge a complaint with the competent data protection authority if they consider that their personal data has been processed in violation of data protection legislation.

Contact details for the Finnish data protection authority can be found at tietosuoja.fi.

12. Amendments to the Privacy Notice

We continuously develop our services and may therefore need to amend and update this Privacy Notice. Amendments may also be based on changes in legislation. We recommend reviewing the content of the Privacy Notice regularly. Amendments will be announced on our website.

This Privacy Notice is available at the Company's office and on its website.

This Privacy Notice was last updated on 30 April 2024.

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