DATA PROTECTION NOTICE

Controller:	Evli Plc ("Evli") Aleksanterinkatu 19 A P.O. Box 1081 FI-00101 Helsinki Tel. +358 9 476 690
Contact person in register matters:	Evli data protection officer: tietosuoja@evli.com .
Name of register:	Client Relationship Register
Purpose of register:	• Managing client relationships and executing and verifying business transactions • Carrying out obligations based on the law and official regulations.

Data subjects:	Persons who have/have had, with respect to companies in the Evli Group
	    a) a client relationship or an application to enter into such, and
	    b) a client-relationship-based interest, obligation or other right in a contract, service or transaction, such as beneficiaries or agents.
	
	Persons with whom an Evli Group company is preparing a client relationship (a potential client)
	    a) at the person's own initiative, or
	    b) at Evli's initiative with the person's consent based on the information in Evli's direct marketing register.

Data content of register:	The register contains the following data on the data subjects: Basic personal data from the Client Register: • Identification data (client ID, personal identity code or date of birth, name, nationalities, taxation countries, language, fiscal residence) • Contact data (addresses, phone numbers, email addresses, contact persons) • Investor data (investor experience and knowledge, and nature of investment activity) • Data on the client's financial position (education, occupation and family relationships, position in the organization, normal payments, origin of assets to be transferred, actual beneficiaries of assets) • Status codes (terminated, liquidated, bankrupt, public

	summons)
	• Phone ID
	• Bank contact data (contra accounts)
	• Cash balances, portfolios, loans (basic data)
	• Agreements.
	Basic personal data in the Client Relationship Register:
	• Basic description of client relationship and notes
	• Data on the creation of the client relationship, data on the first contact
	• Contact persons notified by clients and their identification data; primary contact person.
	Data on the client's preferences:
	• Service language
	• Frequency and method of contacting
	• Use of electronic services
	• Areas of interest for direct marketing.
	Client relationship classification data:
	• Segmentation data, investor class
	• Value and class of investment assets according to size.
	Events in the client relationship:
	• Meetings; notes and quality assessments
	• Invitations to events
	• Client-specific reports, notices, portfolio analyses and reviews
	• Money and portfolio transactions; reports
	• Client contacting; emails and telephone recordings
	• Client complaints.
Regular data sources:	Data is obtained directly from the data subject or from the representatives of the data subject, or from public registers kept by the authorities. Data is formed in connection with implementing the services used by the client. With the client's consent, data can also be obtained from other parties, such as an asset manager or employer.
Regular data disclosures:	Data can be disclosed to Evli Group companies, and to the authorities so they can exercise their statutory right of access to data. Otherwise, data may be disclosed only with the data subject's consent or authorization.
Transfer of data outside the EU or EEA:	Data is not transferred outside the EU or EEA except in cases listed below: • Electronic client notices: Notices may be delivered with services located outside EU or EEA. Processing of personal data is carried out in these cases only in the

	manner permitted by legislation. Electronic client notices include personal data needed for delivery of the notices, i.e. identification and contact data – name, client id and email address.
Register security:	Manual data: • Prescribed by law as confidential. All the people who process data are subject to a statutory professional secrecy obligation and/or non-disclosure agreement • The data is kept in locked premises • Access control in all premises where data is kept. Data stored in client relationship information systems: • Prescribed by law as confidential. All the people who process data are subject to a statutory professional secrecy obligation and/or non-disclosure agreement • Access to the register is restricted with access rights. Each processor of personal data has his/her own user ID and password • Access to the database is restricted with administrator rights. Each administrator has a separate user ID and password for administrative tasks • The systems that use the register are maintained in an information network that is separated from the public network by a firewall • Encryption is used when transferring data over the public network, unless the data subject expressly permits unencrypted data transfer (e.g. use of unencrypted email is permitted with the client's express consent) • The data in the register is backed up and use is monitored regularly • Access control in all premises where data is kept.
Right of inspection and right to require correction of data:	The client, contact person or potential client has the right to inspect the information regarding him/herself that is stored in the register. Contacts regarding the right of inspection must be made in writing to the register's contact persons. The client, contact person or potential client is identified before fulfilling the right. The client also has the opportunity to independently inspect and partly correct his/her data through the My Evli online service. If there are errors or omissions in the registered data, the client, contact person or potential client can contact Evli, Investor Service, P.O. Box 1081, FI-00101 Helsinki to correct the data. Tel. +358 9 4766 9701.

Other rights related to the processing of personal data:	Information on use of personal data www.evli.com/en/footer/use-of-personal-data