

DATA PROTECTION NOTICE

Controller:	Evli Bank Plc ("Evli") Aleksanterinkatu 19 A P.O. Box 1081 FI-00101 Helsinki Tel. +358 9 476 690
Contact person in register matters:	Data Protection Officer: Risto Sundquist, CISO, Risto.Sundquist@evli.com Client Register Officer: Annika Lindroos, Manager – Data Quality, Annika.Lindroos@evli.com .
Name of register:	Client Register
Purpose of processing personal data:	<ul style="list-style-type: none"> • Identifying and knowing your client • Concluding and managing client agreements • Setting up and managing client services • 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: <ul style="list-style-type: none"> 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.
Data content of register:	<p>The register contains the following data on the data subjects:</p> <p>Basic personal data:</p> <ul style="list-style-type: none"> • Identification data (client ID, personal identity code or date of birth, name, nationalities, taxation countries, language, fiscal residence) • Contact data (addresses, telephone numbers, email addresses, contact persons and their identification details) • Entry stating whether data subject is employed by the controller. <p>Data required by the industry's regulation regarding customer due diligence (e.g. KYC, AML, MiFID II):</p> <ul style="list-style-type: none"> • Investor experience and knowledge, and nature of investment activity • Financial position (education, occupation, family relationships, data regarding assets) • Normal payments, origin of assets to be transferred • Actual beneficiaries of assets, client's representatives and their identification details.

	<p>Client classification data:</p> <ul style="list-style-type: none"> • Status codes (terminated, liquidated, bankrupt, public summons) • Data on payment defaults, credit rating • Legal form, sector, sector code. <p>Client basic business data:</p> <ul style="list-style-type: none"> • Identifiers, identification method and identification date • Bank contact data (contra accounts) • Accounts, portfolios, loans (basic data and control data) • Control data for reporting and client communications • Collateral and pledge data • Price lists • Agreements and applications • Data regarding the asset manager • Permitting electronic data exchange with normal email • Direct marketing prohibition. <p>Personal data related to institutional clients:</p> <ul style="list-style-type: none"> • Identification data (name, address, telephone number, fax number, email address) • Employment and occupational data • Services offered or description of collaboration • Project schedules.
<p>Regular data sources:</p>	<p>Data is obtained directly from the data subject or from the representatives of the data subject, from public registers kept by the authorities, and from credit information registers. 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.</p>
<p>Regular data disclosures:</p>	<p>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.</p>
<p>Transfer of data outside the EU or EEA:</p>	<p>Data is not transferred outside the EU or EEA.</p>

<p>Principles of register security:</p>	<p>Manual data:</p> <ul style="list-style-type: none"> • 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. <p>Data stored in client information systems:</p> <ul style="list-style-type: none"> • 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.
<p>Right of inspection and right to require correction of data:</p>	<p>The client has the right to inspect the data regarding him/herself that is stored in the register. Requests regarding the right of inspection must be presented in writing to the register's contact persons. The client is identified before the right is fulfilled.</p> <p>The client also has the opportunity to independently inspect and partly correct his/her data through the My Evli online service.</p> <p>If there are errors or omissions in the registered data, the client can contact Evli Bank, Investor Service, P.O. Box 1081, FI-00101 Helsinki to correct the data. Tel. +358 9 4766 9701.</p>
<p>Other rights related to the processing of personal data:</p>	<p>Information on use of personal data: www.evli.com/en/footer/use-of-personal-data</p>