

**Nordic Investment Managers Forum**  
**Data Privacy Notice**  
May 2018

**General**

This privacy notice provides information about the processing of personal data by Nordic Investment Managers Forum ("NIMF"), and the rights of individuals regarding the processing of their personal data. NIMF does its best to ensure that the processing of personal data is carried out in such a way that data protection is safeguarded. NIMF and its partners process personal data in accordance with the applicable data protection laws and regulations, notably the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

**Individuals of whom NIMF processes personal data**

NIMF processes personal data of individuals including, but not limited to:

- Prospect clients, prospect business partners or prospect suppliers;
- Clients, shareholders, beneficial owners, authorised representatives or contact persons of clients, business partners or suppliers;
- Visitors of NIMF's websites;

**Personal data processed by NIMF**

Personal data processed by NIMF, depending on the type of service, includes, but is not limited to, data concerning identity, personal details, contact details, position or capacity (such as function or role, if acting on behalf of or for a client, supplier or business partner), other unique identifiers, signatures, IP address or visits to NIMF's websites.

If an individual provides NIMF with personal data of third parties (family members, employer, etc.), NIMF will only process this personal data insofar as it is necessary for the performance of its service, and in accordance with this policy. It is the individual's responsibility to notify the concerned third parties about the processing.

**Purposes of data processing**

NIMF processes the personal data necessary to perform its business activities. This includes processing the personal data:

- In order to comply with legal and regulatory obligations;
- To perform the contractual services;
- When NIMF has a legitimate interest to process the personal data;
- When NIMF has received the individual's consent for the processing.

NIMF processes personal data for the following purposes:

- Assessing and accepting of, entering into and executing of agreements with clients, business partners or suppliers, coordinating the organisation of NIMF event;
- Performing client relationship management;
- Business process execution, internal management reporting and analysis including activities such as statistical and scientific analyses for the development and improvement of NIMF's events, client service; creation of a global view of clients; implementing business controls;
- Compliance with the applicable laws and regulations as well as relevant sector-specific guidelines and regulations including, but not limited to, Anti-Money Laundering, Anti-Terrorist Financing, MiFID regulations, and Know-Your-Customer obligations;
- Recording electronic communication and phone conversations.

**Phone recording**

NIMF records phone conversations (incoming and outgoing calls) for the following purposes:

- Comply with a legal obligation;
- Obtain an evidence of commercial transactions and / or communications;

- Collect data related to the business activities of NIMF (e.g. event organisation);
- Verify commercial agreements agreed over the phone;
- Confirm / listen again the instructions and / or trading orders given by customers / third parties to NIMF over the phone;
- Solve dispute.

### **Profiling**

NIMF uses profiling. Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to an individual, including the historical financial interests such as for example: investment themes.

NIMF may use profiling:

- To monitor transactions to detect fraud and prevent money laundering and terror financing;
- To gain customer insight; and
- To enhance the quality of direct marketing communication, such as invitations to events based on interest.

### **Transfer of personal data to third parties**

NIMF may transfer personal data to third parties such as business partners, other financial institutions, suppliers or other service providers, intermediaries, beneficiaries of transactions, courts, regulators, warning systems or other third parties involved if reaching any of NIMF's purposes listed above requires it.

Third parties may be located inside and outside of the European Economic Area (EEA). Transfer outside of the EEA will only occur if an adequate level of data protection is guaranteed; NIMF may rely on an adequacy decision taken by the European Commission ("white list"). NIMF will only pass on personal data to third parties outside the EEA in accordance with the applicable laws and regulations. Third parties receiving personal data are, in turn, themselves required to process personal data in compliance with legal and/or contractual obligations.

### **Data security**

NIMF has taken reasonable physical, technical and organisational measures to ensure the personal data it processes is prevented from accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

### **Storage period**

NIMF shall retain personal data only:

- For the period required to serve the purposes for which the personal data were collected; and/or
- To the extent necessary to comply with applicable legal obligations.

### **Rights**

Individuals having their personal data processed by NIMF have the following rights under the General Data Protection Regulation:

- Right to access their personal data processed by NIMF and obtain a copy of the personal data undergoing processing;
- Right to have NIMF rectify, delete or block their personal data if the data is incorrect, incomplete, or not processed in compliance with applicable data protection laws and regulations;
- Right to object to or limit the processing of their personal data on the basis of compelling legitimate grounds relating to their particular situation provided that NIMF processed the personal data on its legitimate interests or those of a third party to whom NIMF has disclosed the data;
- Right to erasure ("right to be forgotten"), unless keeping the data is justified by lawful reasons;
- Right to object to receiving direct marketing communications from NIMF;
- Right to withdraw their given consent at any time without reason for the future;
- Right to data portability, meaning that the individuals may receive the personal data they have provided to NIMF in a structured, commonly used and machine-readable format, so it can be sent to another data controller.

The request should be sent in writing to:

[info@nimf.lu](mailto:info@nimf.lu)

For confidentiality reasons, the individual exercising one of the above mentioned rights must provide NIMF with a proof of identification together with the request.

If the individual is not satisfied with how NIMF is handling the request, she or he may file a complaint with the Commission Nationale pour la Protection des Données (CNPD, [www.cnpd.public.lu](http://www.cnpd.public.lu)), and with the Commission de Surveillance du Secteur Financier ([www.cssf.lu](http://www.cssf.lu)).