

ISEC Integrity policy

Processing of personal data

Basic principles

ISEC Group AB and its subsidiaries, ISEC Systems AB and ISEC Services AB, (hereinafter referred to as “ISEC”) undertake to respect and protect your personal data and your personal integrity in accordance with applicable legislation, industry rules and other relevant standards. We describe our basic principles for the processing of personal data below in order for you to be able to better understand how we process information about you. This policy was created as a consequence of the European Union General Data Protection Regulation (GDPR) which entered into force throughout the EU on 25 May 2018, and is incorporated in Swedish domestic legislation as the Swedish Data Protection Act. The rules of the Swedish Data Protection Act cannot be applied in all cases due to the fact that it conflicts with other legislation such as, for example, the Swedish Archives Act, the Swedish Tax Act, and the Swedish Accounting Act. Accordingly, this policy sheds light on how ISEC applies the Swedish Data Protection Act based on our operations and applicable laws.

Collection of information

ISEC requests personal data from our customers for the purpose of providing them with access to ISEC’s technical platforms and systems. We also collect information in order to be able to perform our service undertakings as contractually agreed with our customers such as, for example, fund administration, transfer agent administration and fund accounting. Accordingly, on behalf of our customers, we store information regarding you which includes your name, contact information, personal identification number, address, citizenship, any guardianship information and correspondence between ISEC and customers/end-customers, etc. We may temporary store information related to you such as, for example, an IP address.

When opening an account, we collect personal data on the application document in order to be able to open an account as well as correspondence relating to such application.

Furthermore, we collect information regarding you as a customer which relates to legal requirements such as, for example, the results of questionnaires related to legislation governing money laundering and so-called KYC (Know Your Customer) issues, tax domicile and statements of earnings and deductions.

In addition, other information may be registered which necessary for the practical provision of services to you as a customer such as, for example, custodian account information, bank account information, etc.

In certain cases, we may also save contact information for employees of our business partners for prospecting and marketing purposes such as, for example, newsletter mail-outs, user association days, and customer letters.

Use of the information

Personal data is processed so that ISEC is able to fulfil its undertakings in relation to our customers and their end-customers. ISEC also processes personal data in order to be able to provide our customers access to our systems and services.

ISEC processes the personal data necessary to perform its engagements for our customers and their end-customers. This includes, among other things, providing advice, management, transaction registration, reporting to end-customers and governmental authorities, reconciliations with custodian banks/custodial institutions, purchases and sales of fund units and related administration of fund trading registers.

The processing of personal data carried out by ISEC encompasses collection, registration, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, alignment or combination, restriction, erasure or destruction. As regards our undertakings in relation to our customers ISEC is entitled to send personal data to third-party providers in order to be able to carry out necessary registration verifications of business partners for the purposes of customer verification. This entails, for example, that ISEC may forward personal data to the custodian institution appointed by ISEC's business partners. In accordance with applicable tax legislation and agreements with business partners, ISEC also forwards personal data to the Swedish Financial Supervisory Authority and the Swedish Tax Agency.

E-mail and other business correspondence which need not be saved per separate customer due to business undertakings, following consent or for legal reasons, shall be deleted after 12 months.

ISEC's processing of personal data shall continue as long as the data subject is a customer of any of ISEC's business partners or otherwise consents to continued processing, or so long as prescribed by European Union law or Swedish law.

As regards back-up copies of customer information, copies of back-ups older than 12 months are erased on a regular basis with the exception of yearly back-ups one of which is saved per year in compliance with tax laws and the Swedish Accounting act.

After seven months, your personal data is anonymised when it is no longer relevant for the purposes for which it was collected. Exceptions to this measure include pending legal disputes or investigations conducted by governmental authorities relating to the collected personal data.

Cookies

A cookie is a text file which is copied on to your hard disc by a website. Cookies from websites collect no data regarding you for profiling purposes. On the other hand, our websites allow the reader to save log-on related information for the purpose of facilitating subsequent log-ons for the user.

You can delete cookies at any time in the settings on your web browser.

Security

It is important to ISEC Group AB that your personal data is processed securely. In order to prevent unauthorised use or exposure of your personal data, we use reasonable physical, technical and organisational security measures relative to the quantity and sensitivity of personal data.

User rights

Set forth below are the rights you have as a data subject.

Right to erasure

You are entitled to request erasure of your personal data in our possession. Please note that such data may be erased only after concluding the customer relationship and not earlier than permitted by domestic laws which have precedence over the Swedish Personal Data Act. Complete erasure cannot occur earlier than 7 years following conclusion of the customer relationship in accordance with the Swedish Accounting Act.

The right to limit processing and to object

You are entitled to request limitation of the use of your personal data if, among other things, you suspect that the processing is unlawful, if you object to processing, or contest the accuracy of the personal data. If personal data is collected on the basis of the lawful grounds - legitimate interests or in the public interest - you are also entitled to object to processing in those cases in which the personal data is processed for direct marketing or profiling.

Rectification and insight

ISEC strives to ensure that all information we process is correct. In the event any information proves to be incorrect, rectification shall occur without delay. Naturally, you are entitled to read the information we have registered about you. If you wish to acquire this information or have any other questions concerning our processing of personal data, please contact ISEC's data protection officer by sending an e-mail to the following e-mail address: **gdpr@isec.com**.

In the event you believe the manner in which ISEC processes your personal information violates the Swedish Data Protection Act, you are entitled to file a complaint with the supervisory authority.

Personal data controller/Personal data processor

Questions regarding personal data relating to the new Swedish Data Protection Act may always be addressed to the personal data controller.

ISEC Services AB, Vattugatan 17, 111 52 Stockholm, is the personal data controller for ISEC's fund hotel. For more information regarding the funds included in the fund hotel, please refer to <https://www.isec.com/isecfunds>

In those cases in which ISEC handles outsourcing of administrative services and/or IT operations, ISEC's respective business partner is the personal data controller.

One or more of the companies, ISEC Services AB, ISEC Group AB and ISEC Systems AB, Vattugatan 17, 111 52 Stockholm is the personal data processor in these cases.

For these reasons, we ask that you contact the respective personal data controlling fund company of which you are a customer if you have any questions relating to the new Swedish Data Protection Act.