

UAB “UNION ASSET MANAGEMENT”

PRIVACY POLICY

1. GENERAL PART

- 1.1. In this Privacy Policy (hereinafter referred to as the **Policy**), you will find basic information about UAB “Union Asset Management” (hereinafter referred to as **we** or the **Management Company**) on the processing of personal data of clients of the Management Company, visitors to the Management Company’s website www.uam.lt, and the processing of data of other natural persons.
- 1.2. The Management Company is a management company with a license issued by the Bank of Lithuania, operating under the Law of the Republic of Lithuania on collective investment undertakings intended for informed investors and other applicable laws (more detailed information about the licenses held by the Management Company: <https://www.lb.lt/lt/finansu-rinku-dalyviai/uab-union-asset-management>).
- 1.3. In its activities, while managing personal data and respecting the privacy of natural persons (data subjects), the Management Company also complies with the legal acts regulating the protection of personal data, including the Law of the Republic of Lithuania on Personal Data Protection and the General Data Protection Regulation (EU) 2016/679.
- 1.4. We inform you that this Policy may be updated. In all cases, the Management Company publishes the new version of the Policy on its website.

2. DATA CONTROLLER AND CONTACT DETAILS

- 2.1. The Management Company processes personal data of its clients, visitors to the Management Company’s website, candidates for vacant positions, persons submitting inquiries, and other natural persons (data subjects).
- 2.2. The data controller of these personal data is the Management Company, i.e., UAB “Union Asset Management,” legal entity code: 305552297, registered office address: Savanorių Av. 443A, Kaunas, Republic of Lithuania, phone number +370 655 58866, email r.baranauskas@uam.lt.
- 2.3. If you have any questions related to this Policy or the processing of your personal data, you can contact the Management Company using the contact details provided above. In order for us to properly evaluate your request and provide you with a response, please submit inquiries in writing (e.g., by email).

3. PROCESSING OF CLIENTS’ PERSONAL DATA

Processing of personal data for the purpose of providing Management Company services

- 3.1. The Management Company processes personal data of its clients (their representatives) for the purpose of providing Management Company services, by entering into contracts

with clients and implementing the requirements stipulated in the legal acts regulating the activities of the Management Company.

- 3.2. In providing services, the Management Company may process the following personal data of its clients, among other things: name, surname, personal identification number, other data from an identity document, contact details, residential address, data on citizenship, data on employment and positions held, data on education, professional knowledge, and experience in the investment field, data on financial position, creditworthiness information, and/or other data necessary for the provision of respective Management Company services. The Management Company may obtain this client (representative) data directly from the client (representative) themselves or from other financial institutions or business entities (if they apply to them for Management Company services).
- 3.3. The Management Company may provide clients with the opportunity to log in to their individual account on the Management Company's website, where relevant information related to the specific service provided to the client is provided. Clients log in to their account using unique login credentials provided to them. In order to properly administer this system, the Management Company also processes additional personal data of its clients, including but not limited to: client user ID, login passwords, the time of the client's login to the individual account, data provided by the client in applications or contracts, data on client transactions, and other data. The Management Company processes this personal data in accordance with contracts concluded with clients.
- 3.4. In providing Management Company services, the Management Company retains personal data of its clients for at least 10 years from the date of execution of the transaction or operation, unless the legislation establishes longer periods for the retention of such data. Information about client applications (requests) to acquire or redeem investment units or shares of a collective investment undertaking intended for informed investors managed by the Management Company (hereinafter referred to as the CIU) is kept for at least 3 years after the end of the respective CIU operation term or termination of the operation.

Data processing for the purpose of preventing money laundering and terrorist financing

- 3.5. In fulfilling the requirements of the Law of the Republic of Lithuania on the Prevention of Money Laundering and Terrorist Financing (hereinafter referred to as the Law), before commencing business relations, the Management Company must identify the identity of its clients, their representatives, and beneficiaries. Failure to comply properly with the requirements set out in the Law renders a person unable to become a client of the Management Company. For this reason, the Management Company also processes the personal data of its clients, their representatives, and/or beneficiaries for the purpose of preventing money laundering and terrorist financing.
- 3.6. The data subject may provide the data required by the Law to the Management Company, the data controller. In addition, in cases and on grounds specified by the Law, the Management Company may establish the identity of the client, their representative, or beneficiary without their direct involvement (for example, by obtaining necessary

information from other financial institutions and obligated entities). In properly implementing the requirements for the prevention of money laundering and terrorist financing, the Management Company may obtain additional personal data about clients, their representatives, and beneficiaries from other third parties (for example, client data may be checked against databases of wanted persons, international databases storing and accumulating information about politically exposed persons, etc.).

- 3.7. The Management Company stores the personal data of clients, their representatives, and beneficiaries for the periods specified in the Law, i.e., 8 years from the end of transactions or business relations with the client (unless other legislation establishes a longer data retention period). In certain cases specified by the Law, some personal data are stored for a shorter period (for example, correspondence relating to business relations with the client is kept for 5 years from the end of transactions or business relations with the client).

Processing of personal data for newsletter sending purposes

- 3.8. The Management Company may process the personal data of the client and/or their representative for the purpose of sending newsletters to clients (direct marketing). In newsletters sent to clients via email, the Management Company provides information about its activities, newly established funds, new projects, as well as other news related to the services provided by the management company.
- 3.9. For this purpose, the Management Company processes the following personal data of the client (or their representative): name, surname, email address. Personal data are processed on the basis of your clear and unambiguous consent.
- 3.10. Persons, before becoming clients of the Management Company or existing clients of the Management Company, may at any time (i.e., both in advance and later) refuse or withdraw their consent for the processing of their personal data for newsletter sending (direct marketing) purposes. Such objection can be expressed in writing by contacting the Management Company (for example, by email) or by clicking on the appropriate link in the newsletter received.
- 3.11. The storage period for the personal data of the client (or their representative) processed for the purpose of sending newsletters (direct marketing) is 2 years from the end of business relations with the client, unless the client expresses objections to receiving newsletters before the end of this period. Upon expiry of the specified period or upon objection by the client, the Management Company will cease processing these personal data for direct marketing purposes.

4. PROCESSING OF PERSONAL DATA IN HANDLING REQUESTS

- 4.1. The Management Company processes your personal data when you contact the Management Company by email, submit requests on the Management Company's website, on the Management Company's social media accounts, or by any other means.
- 4.2. When submitting a request to the Management Company, please comply with at least the minimum requirements for the protection of personal data. If it is not necessary to disclose certain personal data for the intended purpose (request, complaint, letter, request for clarification), do not provide this excess data.

- 4.3. Along with your request, the Management Company processes the personal data obtained to properly handle requests, ensure the quality of services provided, if necessary, fulfill various legal requirements, and defend the legitimate interests of the Management Company. The Management Company processes the personal data obtained with your consent, i.e., when you actively contact the Management Company.
- 4.4. The storage period for the personal data specified in your request is up to 3 years, depending on the nature of the data received and other circumstances. Your personal data may be stored for a longer period if necessary for the defence of the Management Company's rights and legitimate interests, proper handling of requests, investigation of complaints, or resolution of disputes, as well as in other cases specified in legal acts.

5. VISITING THE WEBSITE

- 5.1. When visiting the Management Company's website www.uam.lt, the Management Company may process the visitor's IP address as well as other network data (if provided). Such data is collected by cookies and/or similar technological solutions with the consent of users.
- 5.2. Cookies are small files sent to the user's web browser and stored on the visitor's device. Cookies are transferred to the visitor's computer when visiting the Management Company's website for the first time. Cookies are used to ensure convenient, secure operation of the website, as well as to analyze the habits of website visitors. This allows for continuous improvement of the website's functionality and better adaptation to the needs of visitors.
- 5.3. Some types of cookies – essential and analytical cookies – are necessary for the proper functioning of the website. Therefore, refusing these cookies may render the website non-functional.
- 5.4. By changing the settings of your web browser, you can control the use of cookies. More useful information about cookies, how they work, and how to control and delete them can be found on the website <http://www.allaboutcookies.org>.

6. RECIPIENTS OF PERSONAL DATA AND OTHER INFORMATION

- 6.1. For the processing of your personal data, the Management Company may engage data processors. Such engaged data processors provide various services to the Management Company. These may include companies providing data storage services, accounting service providers, companies providing valuation services for financial assets, communication service providers, companies developing and maintaining software, companies conducting online activity analysis, and other service providers. The personal data of data subjects provided to these engaged data processors by the Management Company may be disclosed only to the extent necessary for the provision of their respective services.
- 6.2. In providing management company services, the Management Company may transfer certain personal data of its clients (or their representatives) to other data recipients, such as the Bank of Lithuania, companies providing accounting services, individuals providing audit services, depositories, etc.

- 6.3. We ensure that data processors (service-providing companies, etc.) to whom your personal data are transferred comply with (where applicable under the law) the provided instructions and personal data processing instructions, and implement appropriate organizational and technical measures to protect personal data from accidental or unlawful destruction, alteration, disclosure, or any other unlawful processing.
- 6.4. In accordance with the procedure established by the Law on the Prevention of Money Laundering and Terrorist Financing, the Management Company may, in certain cases and on certain grounds, transfer the personal data of clients, their representatives, and/or beneficiaries to the Financial Crime Investigation Service under the Ministry of the Interior of the Republic of Lithuania, other law enforcement agencies, and financial institutions operating within and outside the EEA. In all cases, the Management Company makes reasonable efforts to ensure that the personal data of clients, their representatives, and/or beneficiaries are not lost or unlawfully used.

7. YOUR RIGHTS AS DATA SUBJECTS

- 7.1. In relation to your personal data, you have rights provided for in the legislation, namely:
 - 7.1.1. The right to familiarize yourself with your personal data and how they are processed. You have the right to receive confirmation from the Management Company that it processes your personal data, as well as the right to familiarize yourself with the personal data processed about you and other related information.
 - 7.1.2. The right to demand correction of inaccurate, incorrect, or incomplete data. If you believe that the information processed by the Management Company about you is inaccurate or incorrect, you have the right to request that this information be changed, clarified, or corrected.
 - 7.1.3. The right to request the erasure of your personal data. In certain circumstances specified in the legislation (when personal data are processed unlawfully, the legal basis for data processing has disappeared, etc.), you have the right to request that the Management Company erase your personal data.
 - 7.1.4. The right to request the restriction of the processing of your personal data. In certain circumstances specified in the legislation (when personal data are processed unlawfully, you dispute the accuracy of the data, etc.), you have the right to request that the Management Company restrict the processing of your personal data.
 - 7.1.5. The right to request the transfer of your personal data to another data controller or to provide it directly in a convenient form to you. The data that the Management Company processes with your consent and whose processing is carried out using automated means, you have the right to receive in a commonly used and machine-readable format and to request their transmission to another data controller.
 - 7.1.6. The right to object to the processing of your personal data if such data are processed on the basis of legitimate interest. If your personal data are

processed on the basis of legitimate interest, you may object to such processing of your personal data, except in cases provided for in the legislation (for example, when there are legitimate reasons for such data processing, etc.).

- 7.1.7. The right to withdraw your consent to the processing of your personal data at any time (when your personal data are processed on the basis of separate consent). By withdrawing your consent to the processing of personal data based on your consent, the data processing based on your consent will be terminated.
- 7.2. We remind you that these data subject rights are exercised if all requirements provided for in the legislation are met. To learn more about your rights as data subjects, the conditions and specifics of their implementation, you can visit the website of the State Data Protection Inspectorate at www.ada.lt in the section "Your Rights".
- 7.3. To exercise your rights or if you have any questions related to the protection of your personal data, please contact the Management Company using the contacts provided in this Policy above. In order for us to properly review your request and provide you with a comprehensive response, please submit your inquiries to us in writing (by email).
- 7.4. If you believe that your rights related to the protection of personal data are violated, you have the right to contact the State Data Protection Inspectorate and file a complaint. However, in all cases, we recommend contacting the Management Company first to find an appropriate and effective solution to the problem.