

## PRIVACY NOTICE

Dasos Capital Oy (Dasos) is fully committed to protecting your individual rights and keeping your personal data safe. In this Privacy Policy we describe the collection, usage, storage and sharing practices of personal data.

We process individuals' personal data for a numerous reasons. When we write "You", we mean you as a service provider, customer, a potential customer, our customer's employee or other relevant parties, such as beneficial owners, authorised representatives and associated parties.

The Website is used as a home page for the fund management company in order to inform about the company. The website may contain links to the third parties' websites, which are not governed by this Privacy Statement and which may have their own privacy policies and statements. Dasos does not take responsibility for any privacy practices enforced by any third-party sites to which we link.

Dasos acts as a controller in terms of the processing of your personal data described herein.

### 1. What personal data do we collect and why we use your data

As a part of our business, we process personal data for various purposes, such as to exercise our legitimate interests, e.g. maintain and develop our client relationships and our business. In some cases, processing personal data is required to fulfill our contractual obligations. In some cases, processing is based on your consent. Data protection laws require that we only process and use your data for certain predetermined reasons, and only if we have a legal basis to do so. Below you will find an overview of the different purposes for which we process your personal data as well as their respective legal basis:

- 1) Agreements with the service providers  
The performance of service contracts requires that we process certain personal data. Dasos is obliged to carry out Know Your Customer process, including the prevention on money laundering and terrorism financing.
- 2) Data relating to investors  
Dasos provides investment advisor and fund services. The performance of such service contracts requires that we process certain personal data which depends on the scale of the service provided and the client profile. Short descriptions of most common situations where personal data is collected and processed are listed below:
  - (a) Data relating to unit holders: According to applicable law, Dasos is obliged to handle subscriptions, redemptions and reporting in terms of the fund unit holders. It is necessary for Dasos to process certain personal data to fulfill these obligations.
  - (b) Client categorisation and client control: Irrespective of whether a person becomes a client or a fund unit holder or not, Dasos is obliged to carry out client categorisation and client control (i.e. to prevent money-laundering and terrorism financing). Also fulfilling such obligations entails the processing of personal data.
  - (c) Tax reporting:  
National and international regulations require us to collect and report certain information regarding the customer's taxation.
- 3) Handling of customer complaints and data subject requests.  
We strive to keep our customers satisfied but should a customer raise a complaint, we will keep records of such complaints in accordance with applicable legislation. We will also keep records of your requests as a data subject, to handle your matter as efficiently as possible.
- 4) Business development.  
It is in Dasos' interest to develop our business and provide first-class service and products in order to meet the requirements of our clients and investors. It is also in our interest to process the personal data in duly manner and according to the applicable laws.
- 5) Recruitment.  
If you apply for a job at Dasos, we handle your application, CV and other documents that contain personal data. Such processing is based on your consent.

## **2. How we may use your personal data and the lawful basis for doing so**

Certain processing of personal data is necessary for the performance of contracts and to adhere to legal requirements applicable to Dasos. Should you not provide the necessary personal data, we may not be able to provide our services to you or you may not be able to provide your services to us.

### ***Entering into and administration of service and product agreements (performance of a contract)***

The main purpose of our processing of personal data is to collect, verify, and process personal data prior to giving/receiving an offer and entering into a contract with you.

### ***Fulfilment of requirements and obligations stated in laws, regulations or decisions from authorities and supervisors (legal obligation)***

In addition to the performance of contract, processing of personal data also takes place for us to fulfil our obligations under law, other regulations or authority decisions.

- 1) Legal entity and person related data (examples in brackets):
  - a) Basic identification data (legal name, social security number/date of birth, ID copy, name and title of company representative).
  - b) Contact details (name, phone, e-mail and domicile).
  - c) Information on the fund unit holders (amount, classes and series in terms of fund units).
  - d) Data on the customer relationship (contract information, transaction details).
  - e) Data relating to know your customer procedures and customer identification, including information on beneficial owners.
  - f) Information required for us to adhere to tax reporting obligations (e.g. tax domicile and tax number).
  - g) Publicly available and other external sources; register held by governmental agencies (such as population registers and registers held by tax authorities, company registration offices, enforcement authorities, etc.), sanction lists (held by international organisations such as the EU and UN as well as national organisations such as Office of Foreign Assets Control (OFAC)), registers held by credit-rating agencies and other commercial information providers providing information on e.g. beneficial owners and politically exposed persons.
  - h) Recruitment information (application, experience, education and any attachments received).

Specific personal data processed and the extent of the processing vary depending on your profile (e.g. as a client, potential client, website's visitor or contact person of a service provider), the types of services provided and client category.

## **3. Who we may disclose your personal data to**

### ***Third parties to whom your personal data is disclosed***

Personal data processed in relation to your customer relationship is only disclosed to our cooperation partners to the extent necessary for providing our services to you and executing your client contract or you have consented thereto. Such cooperation is based on written agreement that ensures that your personal data is protected. We also may disclose personal data to the authorities as far as we have a legal obligation to do so.

### ***Transfer of data outside EU/EEA***

For the conduct of our business we partly use services, such as e.g. cloud services, where the service provider is a company located outside the EU or the EEA or that belong to such a group. Transfer of data to such organizations is possible, if there are sufficient protective measures for the transfer in question, which fulfill the requirements of data protection laws. Data may also be transferred in situations when it is required for the execution of your contract or you have provided your consent there-to.

## **4. How we protect your personal data**

Keeping your personal data safe and secure is the key/core in doing our business. We use appropriate technical, organisational and administrative security measures to protect any information we hold from

loss, misuse, and unauthorised access, disclosure, alteration and destruction. In addition, there is restricted staff access rights to information regarding client personal data.

## **5. Your privacy rights**

### ***Your rights***

You can exercise your rights by sending us an email at [fundadmin@dasos.fi](mailto:fundadmin@dasos.fi). You are entitled to exercise your rights free of charge. However, for repetitive requests, or requests that are manifestly unfounded or excessive, we reserve a right to charge a reasonable fee. Please note that in order to process your request, we must first identify you or obtain sufficient proof of your identity before we can process your request and provide the information.

### ***Right to access data that we hold on you***

You have the right to access the personal data that we hold on you. We may not always be able to meet your request to provide you with your information as your right might be restricted based on e.g. law or the need to protect the integrity of another person.

### ***Right to withdraw your consent***

To the extent that processing your personal data is based on consent, e.g. when you apply for a job, you are entitled to withdraw your consent by notifying us per e-mail.

### ***Right to request correction of inaccurate or incomplete data***

If you note that the information we have on you is incorrect or incomplete, you have the right to request correction thereof by submitting a written request if the applicable law does not limit the request.

### ***Right to object to processing***

You have the right to object to the processing of your personal data based on legitimate interest. You are required to specify the specific situation where you are objecting to the processing.

### ***Right to request limitation of the processing***

You have the right to request that the processing of your personal data is restricted if

- you deny that they are correct
- the processing is illegal but you anyhow object to a deletion
- we do not longer need the data, but you need it to manage a legal claim, or
- you have objected to the processing and the matter has not yet been clarified.

The processing is then restricted only to storing the data and, as applicable, managing legal claims.

### ***Right to transfer your data***

You may ask to have the data that you have provided to us and that is processed automatically transferred in a machine-readable format to yourself or another service provider designated by you. We will not transfer data to the extent that it includes data on another individual.

### ***You have the right "to be forgotten"***

You may request the deletion of any personal data we hold about you. This does not necessarily mean that all your personal data is erased, if there is another legal ground for keeping them, e.g. our legal obligation.

### ***You have the right to file a complaint***

If you are not happy with how we process your personal data, we do hope that you first contact us and give us the opportunity to sort things out. You may also contact the supervisory authority directly. The Finnish supervisory authority is the Finnish Data Protection Ombudsman. You may also contact the supervisory authority in your country of residence.

## **6. Cookies**

We collect mainly technical information when you visit our website. We only use the necessary cookies to maintain our website in order to improve its function. The information is not used to identify the visitor.

You can set or amend your web browser controls to accept or reject cookies. If you choose to reject cookies, you may still use our websites, however your access to some functionality of our website may be restricted.

## **7. How long we process your personal data**

We will keep your data for as long as they are needed for the purposes for which your data was collected and processed or required by laws and regulations.

This means that we keep your data for as long as necessary for the performance of a contract and as required by retention requirements in laws and regulations. Where we keep your data for other purposes than those of the performance of a contract, such as for anti-money laundering, bookkeeping and regulatory capital adequacy requirements, we keep the data only if necessary and/or mandated by laws and regulations for the respective purpose.

Specific examples are:

- a) Customer data for at least six years.
- b) Information on customer KYC for at least five years after the end of the customer relationship.
- c) Customer complaints and data subjects' requests for as long as they are necessary to deal with the complaints and requests, which shall be at least five years.
- d) In the case of recruitment, the data shall be kept until the recruitment process in question has been completed or, if the applicant has given his or her consent during the recruitment process, for a longer period not exceeding six months from the end of the application period.
- e) Information about potential customers as long as we consider the person to be a potential customer.

The above is only for explanatory purposes and the retention times may differ country to country.

## **8. How changes to this Privacy Policy and the Cookies policy will be made**

We will not diminish your rights under this privacy policy or under applicable data protection laws in the jurisdictions we operate. If the changes are significant, we will provide a more prominent notice, when we are required to do so by applicable law. Please review this privacy policy from time to time to stay updated on any changes.

## **9. Contacting us or the data protection authority**

If you have any questions or concerns regarding our privacy policy, you can contact at [fundadmin@dasos.fi](mailto:fundadmin@dasos.fi) or by mail Dasos Capital Oy, Itämerentori 2, FI-00180 Helsinki, Finland.

You can also lodge a complaint or contact the data protection authority in any of the countries where we provide services to you.

*Last updated in March 2021.*