

INFORMATION REGARDING THE PROCESSING OF PERSONAL DATA INFORMATION FOR CLIENTS

The below information is directed towards the participants and ex-participants of investment funds managed by FORUM Towarzystwo Funduszy Inwestycyjnych Spółka Akcyjna with registered office in Krakow, ex-clients of the Asset Management service as well as sale and redemption brokerage of units or titles, bondholders and ex-bondholders of bonds issued by FORUM Towarzystwo Funduszy Inwestycyjnych S.A. with registered office in Krakow, and representatives of the aforementioned, as well as entities, whose personal data is being processed for the purposes of direct marketing of products and services.

Performing the obligations provided for in 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) (hereinafter "GDPR"), we hereby provide the following information regarding the processing of personal data.

1. Data processing Controller

The Controller of your personal data is FORUM Towarzystwo Funduszy Inwestycyjnych Spółka Akcyjna with registered office in Krakow (hereinafter: "FORUM TFI"), and, in the case of participants and ex-participants of investment funds managed by FORUM TFI (hereinafter: the "Funds"), in the scope of the realization of rights arising from participation, as well as in the case of bondholders of bonds issued by the Funds – these Funds. In the case a particular Fund has been liquidated, FORUM TFI is the Controller of your personal data.

The Controller's address and contact data: Zabłocie Street 25/20, 30-701 Krakow, tel.: +48 12 429 55 93, +48 12 429 90 09, e-mail: info@forumtfi.pl, website: www.forumtfi.pl.

2. The purposes and the legal basis for the processing of personal data

Your personal data is processed for the following purposes:

- 1) realization of an agreement, which should be construed as an agreement regarding respectively the realization of participation in a Fund, pursuant to the provisions of a Fund's statute or the realization of rights arising from bonds issued by a Fund, according to the Terms of Issue of these bonds, i.e. pursuant



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FORUM Towarzystwo Funduszy Inwestycyjnych S.A. z siedzibą w Krakowie przy ul. Zabłocie 25/20, zarejestrowane w Sądzie Rejonowym dla Krakowa - Śródmieście, Wydział XI Gospodarczy KRS pod numerem 0000264440, NIP 677 22 78 460, REGON 120297174, kapitał zakładowy 1.000.000,00 PLN, kapitał wpłacony 1.000.000,00 PLN.

- to article 6 paragraph 1 item b of GDPR – only in the case of current participants and bondholders of the Funds,
- 2) compliance with the personal data Controller’s legal obligations, pursuant to article 6 paragraph 1 item c of GDPR, in particular resulting from: act of 27th of May 2004 on investment funds and management of alternative investment funds, act of 15th of January 2015 on bonds, act of 29th of September 1994 on accounting, act of 26th July 1991 on personal income tax, act of 1st of March 2018 on combating money laundering and financing of terrorism (hereinafter the “**Act on AML**”), act of 9th of October 2015 on the realization of the Agreement between the government of Poland and the government of United States of America to improve international tax compliance and to implement FATCA, as well as the act of 9th of March 2017 on exchange of tax information with other countries (CCRS),
 - 3) realization of the Controller’s or third party’s legitimate interest, pursuant to article 6 paragraph 1 item f of GDPR, which in particular should be construed as: direct marketing, investigation and defense against claims, prevention of scams, keeping statistics and analyzes, ensuring safety of IT environment and application of internal control systems,
 - 4) transfer of your personal data (as the data of a particular Fund’s ultimate beneficial owners – within the meaning of the Act on AML) to obligated institutions (within the meaning of the Act on AML, hereinafter the “**Obligated Institutions**”), for the purpose of establishing or maintaining a business relationship with a given Obligated Institution, on the basis of your consent, pursuant to article 6 paragraph 1 item a of GDPR.

3. Categories of processed data

The Controller processes in particular the following categories of your personal data: identification data, address data, contact data, financial identification data, data regarding your core activity, data on ownership status, data on the source of funds, data on identification documentation, data on the state of your knowledge in the field of investing, data on liabilities and expenses related to the services provided by the Controller, transaction data.

4. Recipients of the personal data

Your personal data may be shared with the following categories of recipients:



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Obligated Institutions, Funds' depositaries, distributors of investment certificates, entities providing consulting services, audit services, accounting services, IT services document archiving and destruction services, marketing services, statutory auditors in connection with the audit, as well as entities and bodies to which FORUM TFI or the Funds are required to disclose data on the basis of generally applicable laws.

5. Period of data storage

Depending on the basis for the processing, your personal data shall be stored for a period necessary to execute the agreement (i.e. until the end of participation in a Fund/redemption of bonds by a Fund) and after that period, shall be stored for a period necessary to fulfill the Controller's legal obligations and possible investigation and defense against claims, resulting from the course of general periods of limitation of claims, counted from the date of termination of the contract. Data processed for marketing purposes shall be stored until an objection to their processing is made.

6. Rights of the data subject

You can request from the Controller to:

- access the contents of the data, pursuant to article 15 of GDPR,
- rectify the data, pursuant to article 16 of GDPR,
- have the data removed, pursuant to article 17 of GDPR,
- limit the processing of the data, pursuant to article 18 of GDPR.

You also have a right to:

- object to the processing of the data, pursuant to article 21 of GDPR and
- have the data transferred, pursuant to article 20 of GDPR.

Furthermore, you have a right to lodge a complaint with a supervisory authority, i.e. the President of the Personal Data Protection Office.

7. Source of the personal data (in the case of acquiring them not from the data subject)

In the case you were represented by an attorney or a different representative, during the conclusion of the agreement or transactional documents with FORUM TFI or a Fund – the source of your personal data are these persons.

8. Provision of your personal data is voluntary, however it is necessary for the realization of a given agreement and failure to do so prevents conclusion and realization of that agreement.



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