

Privacy policy of BVI Bundesverband Investment und Asset Management e.V.

**Our handling of your data and your rights
Information according to Articles 13, 14 and 21 of the Datenschutz-Grundverordnung (DS-GVO,
General Data Protection Regulation, GDPR)**

We protect and respect your personal data

We respect and protect your privacy and comply with all data protection regulations. This applies regardless of whether you are a legal representative of a member company, an employee of a member company participating in a BVI committee or simply using our wide range of information services. What does this mean in plain language when it comes to your personal data?

Below you can find a quick and easy overview of what kind of personal data we collect from you and what we do with it. In addition, we inform you about your rights under applicable data protection legislation and tell you whom to contact should you have any questions.

1. Who is responsible for data processing and who can I apply to?

The responsible body is:

BVI Bundesverband Investment und Asset Management e. V. (hereinafter referred to as "BVI")
Bockenheimer Anlage 15
60322 Frankfurt am Main, Germany
Phone: +49 69 154090 0

As the responsible body, we take all legally required measures to protect your personal data.

Any person concerned can contact our data protection officer directly at any time with any questions or suggestions regarding data protection. You can reach him at the above address or by e-mail at:

datenschutzbeauftragter@bvi.de

2. What sources and data do we use?

We process personal data which we receive from the legal representatives and employees of the member associations as part of a membership of BVI - including the application phase - (membership administration), when persons register for participation in a BVI committee, contact us by e-mail or telephone or register for our online services or events. In addition, we process personal data that we have obtained in a lawful manner (e.g. in the course of events, to fulfil contracts with customers, suppliers and service providers or on the basis of your consent). On the other hand, we process personal data that we have researched and are permitted to process from publicly accessible sources (e.g. commercial register, media).

Relevant personal data may be:

Name, business address/other contact data (e.g. e-mail address, telephone), gender and optional position in the company, job title, account details, date and place of birth, photos, videos.

Within the framework of our business relationship, in particular through personal, telephone or written contacts initiated by you or your employer, further personal data is created, e.g. information about the contact channel, date, occasion, result, (electronic) copies of correspondence.

We do not collect any special categories of personal data known as "sensitive data", such as religious beliefs. Likewise, we do not collect data from children.

3. Why do we process your data and on what legal basis?

We process your personal data in accordance with the Datenschutz-Grundverordnung (DS-GVO) and the Bundesdatenschutzgesetz (BDSG).

a. To fulfil contractual or quasi-contractual obligations (Art. 6 para. 1b DS-GVO)

The processing of personal data is carried out in the course of performing the tasks set out in our Articles of Association (establishment and implementation of a membership in BVI) and within the framework of the implementation of contracts with third parties, service providers/suppliers. Our tasks result from our articles. They are in particular:

- national and international representation of our members rights and interests in order to promote Germany as an investment hub and protection of their common interests.
- the provision of support and information for our members in legal and tax matters
- the promotion of the investment and wealth management idea
- the promotion of advice and support for public authorities
- the initiation and maintenance of relations with federations and trade associations on both a national and international level.

b. After weighting legitimate interests (Art. 6 para. 1f DS-GVO)

Where necessary, we process your data to protect our legitimate interests or those of a third party (e.g. representing the rights and interests of our members to promote Germany as an investment hub, asserting legal claims and defending legal disputes, marketing our events). If, for example, your contact data are collected during an event, we store them for future contacts in connection with our events for professionals.

c. On the basis of your consent (Art. 6 para. 1a DS-GVO)

If you have given us your consent for the processing of personal data for certain purposes (such as subscribing to our newsletter), this processing is then legitimate on the basis of your consent. Your consent can be revoked at any time. This also applies to declarations of consent given to us before the DS-GVO came into force, i.e. before 25 May 2018. Please note that the withdrawal of consent covers only future processing of personal data. Processing which took place before the withdrawal will not be affected.

4. Who will obtain your data?

At BVI, the only people who will have access to your personal data are those who need the data to fulfil our association's objectives. The data will be processed by staff of the association who have been specifically assigned this task and who are committed to treating your data in the strictest confidence. Your interests will therefore be adequately protected. Processors appointed by us (Article 28 of the DS-GVO) may also obtain data for these purposes and are also committed to confidentiality. These processors are normally companies operating in the fields of IT services and printing.

BVI will not forward information about you to third parties unless this is required by law or you have consented to your data being passed on.

5. How long do we store your data?

As long as it is necessary we process and store your personal data for the duration of your company's BVI membership, which includes the initiation and processing of membership. If the data are no longer required for the fulfilment of our association's purpose or legal obligations, they will be deleted regularly, unless their - temporary - storage is still necessary. Statutory record retention obligations and the according time limits are defined in particular in the German Commercial Code and the German Fiscal Code (Abgabenordnung). The time limits for storage and documentation specified there are between two and ten years. Civil law statute of limitations can be up to 30 years, whereby the regular statute of limitations is three years.

6. What rights to data protection do you have?

Every data subject has the right to

- information under Article 15 DS-GVO,
- rectification under Article 16 DS-GVO,
- erasure ('to be forgotten') under Article 17 DS-GVO,
- restrict processing under Article 18 DS-GVO,
- object to the processing of personal data under Article 21 DS-GVO and
- data portability under Article 20 DS-GVO.

The restrictions according to §§ 34 and 35 BDSG apply to the right of information and the right of erasure. In addition, you also have the right to lodge a complaint with the responsible data protection authority. The authority with jurisdiction over us is the Hessian data protection supervisory authority (Article 77 DS-GVO in conjunction with § 19 BDSG).

7. Is there an obligation for you to provide data?

You only have to provide us with the personal data necessary for the acceptance and performance of your association membership and the fulfilment of the associated obligations or for the performance of any other business relationship. Should you decide not to provide us with the required data, we may not be able to comply with your request or grant participation in an event if it cannot be carried out without corresponding processing of certain data.

8. To what extent does BVI carry out automated individual decision-making?

As a matter of principle, we do not use automated individual decision-making (including profiling) in accordance with Art. 22 DS-GVO.

9. Can this privacy policy be modified?

We reserve the right to modify the privacy policy in order to adapt it to changes in the legal basis or in the event of changes to our services or to how we process data. Users are therefore requested to inform themselves regularly about the content of privacy policy on our website.

Information about your right to object under Article 21 DS-GVO

Individual right to object

You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data based on Article 6(1)(f) of the DS-GVO (data processing on the basis of striking a balance between legitimate interests). This also applies to profiling based on this provision within the meaning of Article 4(4) of the DS-GVO. If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or if the processing serves the purpose of establishing, exercising or defending legal claims.

How to object

There is no special form to fill in. Just send your objection to the following address:

BVI Bundesverband Investment und Asset Management e.V.
Datenschutzbeauftragter / Data Protection Officer
Bockenheimer Anlage 15
60322 Frankfurt am Main
Germany