

# Allianz Global Investors

Status:  
05/2018

Fund Privacy Notice for our fund range in Luxembourg:  
UCITS SICAV and FCPs

Please note that “Fund” or “Funds” in this Privacy Notice can refer to both: funds in corporate structure (e.g. SICAV) and non-corporate structure (e.g. FCP) and that for funds in corporate structure such corporate structure itself is the Data Controller in accordance with the provisions of the Regulation (EU) 2016/679 as of 27 April 2016 (the “General Data Protection Regulation- “GDPR”) whereas for funds in non-corporate structure, the respective Fund Management Company is the Data Controller (“hereafter: Controller”)

This Privacy Notice contains the information which we are required to provide you on how the Controller, its service providers and delegates will collect, process and store and personal data that you provide to us in connection with your application and any resulting investment in the Fund. This privacy notice explains how that personal data is used and your rights.

For the purposes of this privacy notice, the Controller’s service providers include as applicable any administrator, depository, custodian and manager of the Fund, any local paying agents and, in each case, their affiliates, delegates and third party outsourced service providers (together the “Service Providers”). In case the Fund as such is the Data Controller, the management company is also defined as a “Service Provider” for the purposes of this privacy notice. The Service Providers may act, in certain circumstances and as assigned according to their roles, also as Data Controller, in particular for compliance with their legal obligations in accordance with applicable laws and regulations (such as anti-money laundering identification) and/or order of competent jurisdiction.

## Whose Personal Data Is Processed?

The Controller and its Service Providers may collect and use your personal data or, if you are not an individual, that of your directors, officers, employees, intermediaries and/or beneficial owners. Unless explicitly stated otherwise, references in this privacy notice to “you” or “your” in the context of processing personal data include, where applicable, the personal data of your directors, employees, intermediaries and/or beneficial owners as the context requires.

If you are providing other peoples’ personal data to the Controller or its Service Providers, you need to provide these individuals with the information required under Data Protection Law on their data protection rights and you should seek their authorisation to provide us with their personal data as appropriate.

## How Your Personal Data Is Used

The Controller and its Service Providers collect and use your personal data to enable them to manage their relationship with you effectively, lawfully and appropriately and to comply with applicable laws and regulations. This includes using your personal data to:

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- perform services in connection with (i) your application for shares in the Fund and (ii) any ongoing investment you make into the Fund. These activities include account opening and managing and administering your holdings in the Fund and any related accounts. They also may include making disclosures to third parties such as auditors, regulatory, data protection and tax authorities, outsourced service providers and their delegates and technology providers as appropriate in order to manage and administer your holdings in the Fund and any related accounts;
- comply with any legal, regulatory or tax requirements applicable to the Controller or its Service Providers;
- pursue the legitimate business interests of the Controller or its Service Providers. This may include recording, maintaining and using recordings of telephone calls and electronic communications that you make and receive from the Controller and its Service Providers for matters relating to your investment in the Fund, dispute resolution, record keeping, security and/or training purposes. This may also include disclosing your personal data to third parties, for example technology providers and other vendors; and protect the Controller and its Service Providers' legal position in the event of any legal proceedings.

Your consent is not required to process your personal data for the purposes referenced above.

### **Screening**

The Controller and its Service Providers may conduct activities required to comply with anti-money laundering requirements (such as "know your customer" checks and PEP, negative news, financial sanctions and other financial crime related screening programmes for the purposes of complying with applicable regulatory and legal requirements, including applicable sanctions regimes. The implementation of these activities and programs may result in the Controller or its Service Providers refusing an application for shares/units in the Fund or delaying or refusing to make any redemption payment or distribution payment to you if you, your directors or any beneficial owner of your shares appear on such screening programmes or if the documentation provided does not satisfy applicable anti-money laundering requirements. In the event that you are identified as a PEP as a result of the screening process, you may be required to provide additional information and/or documentation to the Fund or its Service Providers. Such processing, which may reveal your political opinions or any trade union memberships, is considered lawful on the grounds of substantial public interest permitted under GDPR.

### **Types of personal data used**

The types of personal data collected by the Controller and its Service Providers include: name, date of birth, civil status, nationality, contact details (including postal or email address), banking details, passport or other identification document, invested amount and holdings in the Fund. The Controller and its Service Providers may also collect special categories of personal data in order to perform the activities and to conduct the screening programs specified in the prior paragraph. Such special categories of personal data may include your political opinions or any trade union memberships. The Controller and its Service Providers shall only process any such special categories of personal data as permitted under applicable laws and regulations.

### **Transfers Abroad**

Personal data collected from you or provided by you or on your behalf may be transferred outside of the jurisdiction of the Fund and its Service Providers, including to countries located outside the European Economic Area ("EEA") which may not have the same data protection laws as the jurisdiction in which the Fund and/or its Service Providers are located. These countries include (but are not limited to) the United States of America, India, Hong Kong, Thailand, Canada, Australia and Japan .

If the Controller or its Service Providers transfers personal data outside the EEA, we will take the necessary steps to ensure that appropriate safeguards required by GDPR and other applicable laws and regulations, are

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put in place to protect the privacy and integrity of such personal data, such as the implementation of EU model contract clauses. Please contact [dataprivacy@allianzgi.com](mailto:dataprivacy@allianzgi.com) if you wish to obtain information concerning such safeguards.

### **Data Retention Period**

The Fund and its appointed Service Providers will retain all information and documentation provided by you in relation to your investment in the Fund for such period of time as may be required to provide services to you and as required by applicable legal and regulatory requirements.

You have the following rights in respect of your personal data:

- to be informed about the personal data the Controller and its Service Providers hold about you;
- to access the personal data the Controller and its Service Providers hold about you;
- to have your personal data rectified where it is inaccurate or incomplete;
- to have your personal data erased in certain circumstances (e.g. where the personal data is no longer required for the purposes for which we have collected it or to comply with applicable legal and regulatory requirements or in circumstances where you object to processing and the Controller or its Service Provider (as applicable) has no overriding legitimate grounds for such processing);
- to obtain restriction of processing in certain circumstances (e.g. where you have contested the accuracy of the personal data, for the period required for us to verify the accuracy of that personal data);
- to object to the processing in certain circumstances (e.g. to automated processing or profiling);
- to data portability (i.e. to receive your Personal Data for yourself or another third party elected by the you in a structured, commonly used and machine readable format and/or to have those Personal Data transmitted to another controller in accordance with Data Protection Law;);
- to lodge a complaint to the relevant Data Protection Authority if you consider that the processing of your personal data infringes GDPR or other applicable Data Protection Law;
- The right to judicial remedy or, where relevant, compensation against the relevant data controller or processor in case of infringement of your rights as a result of processing of your personal data in non-compliance with GDPR;
- In case the processing of Personal Data is based on consent, you are entitled to withdraw your consent at any time without prejudice to the lawfulness of the processing

If you wish to exercise any of the above rights against the Controller or its Service Providers, please contact: Allianz Global Investors GmbH, Data Protection Officer, Bockenheimer Landstrasse 42-44, 60323 Frankfurt, Germany (email: [dataprivacy@allianzgi.com](mailto:dataprivacy@allianzgi.com)) or the contact named on the application form.

The Controller or, where appropriate, its Service Provider will respond to your request to exercise any of your rights in writing, as soon as practicable and in any event within one month of receipt of your request, subject to the provisions of the GDPR. The Controller or its Service Provider may request proof of identification to verify your request.

### **Failure to provide personal data**

As set out above, we require you to provide certain personal data in order for us to process your application, to manage and administer your holdings in the Fund and to comply with the Controller's and Service Provider's legal and regulatory requirements. If you fail to provide such personal data, in certain circumstances we may be prohibited from making redemption or any applicable dividend payments to you and/or may be required to discontinue our business relationship with you by compulsorily redeeming your shareholding in the Fund.

**Contact us**

If you have any questions about the Controller's use of your personal data, please contact [dataprivacy@allianzgi.com](mailto:dataprivacy@allianzgi.com).