

*This Privacy Policy was last updated on 21.6.2024 and applies to citizens and persons with permanent residence in the European Economic Area.*

## **Privacy Policy**

### **PROVIDER**

#### **Provider's identification and contact information:**

Name of the Company: Vltava Fund SICAV, plc  
Registered office: 475, Triq Il-Kbira San Guzepp, Santa Venera, SVR 1011, Malta  
ID: SV 23  
Contact: investor@vltavafund.com

All processing of personal data by the provider always takes place in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons in connection with the processing of personal data and on the free movement of such data and on the repeal of Directive 95 /46/EC ("GDPR").

Please note: In the event of any discrepancies between the Czech and foreign language versions of this Privacy Policy, the Czech version will take precedence.

#### **Automated individual decision-making and profiling:**

The Provider will not carry out profiling or automated individual decision-making.

#### **Provider's qualification:**

The Provider qualifies only as the data controller.

The Provider acts as the data controller in relation to the personal data of persons who send the Provider a request to be contacted via the Provider's web form.

#### **What personal data are processed by the Provider, for what purpose and on what legal basis?**

The data processed by the Provider comes primarily from the customers themselves, or from contracts concluded with customers. The purpose of personal data processing is the offer of products and services provided by the Provider, communication with customers takes place through all channels, including electronic ones (e-mail, SMS, web interface).

The Provider is also obliged to process personal data for the purposes of preventing legalization proceeds from criminal activity and terrorist financing.

Furthermore, the Provider processes the data obtained from the User when the User visits the Provider's website and through services such as Google Analytics can then work mainly with statistical data such as the type of web browser, version, visiting region, IP address and other data available through the web browser.

This data is necessary in order to display the website correctly. Except that, the data obtained from the Users can also be used as needed to maintain the secure operation of the website and other purposes that are described in this Privacy Policy. These personal data is processed by the Provider on the basis of its legitimate interest or User`s consent. Information about cookies is provided below.

### **Transfer of personal data to a third country or international organization:**

The Provider transfers the personal data that the User provides via the web form when requesting to be contacted, to the company Intuit Mailchimp, registered at at 675 Ponce De Leon Ave, NE 5000, Atlanta, Georgia 30303, US, <https://mailchimp.com>

This company is registered outside the EU, however participates in the EU-US Data Privacy Framework (DFP).

Within DPF, the transfer of personal data is based on so-called adequate protection. Companies, that are register in the US and meet DPF conditions are considered safe to pass on personal data from the European Union. Based on a new decision on adequate protection personal data can flow securely from the EU to US companies participating in the framework, without having to implement additional data protection safeguards.

### **Sensitive personal data**

The Provider will not process personal data of Users belonging to special categories of personal data pursuant to Article 9 of the GDPR.

### **Who can process the personal data**

The legal regulation on the protection of personal data gives their Provider the possibility to entrust the processing to a processor. If the Provider uses this procedure when processing your personal data, this only happens on the condition that the personal data protection standards of a particular processor are at least at the same level as those of the Provider and that such processor meets the conditions set by legal regulations. The processors that the Provider uses to process personal data are in particular the following:

- investment intermediaries (tied representatives) authorized to mediate the Provider's products or managed funds;
- providers or operators of information technology;
- custodians who process them for the purpose of fulfilling the obligations arising from the performance of the activities of the custodian of investment funds.

## **How long are personal data processed by the Provider?**

Personal data are processed only for as long as there is a legal reason to store them, subsequently the data are deleted promptly.

Personal data processed for the performance of obligations arising from special legal regulations are processed by the Provider for the period of time specified by the relevant legal regulations. This includes, for example, statutory data retention or documentation obligations. These are in particular data retention obligations arising from civil, commercial or tax laws. When the retention obligation expires, personal data will be deleted promptly.

## **DATA SECURITY**

To secure the User's data against unauthorized or accidental disclosure, the Provider uses reasonable and appropriate technical and organizational measures.

The Provider will ensure that if servers are located in a data center operated by a third party, similar technical and organizational measures are implemented by that third party.

All data are located only on servers located in the European Union or in countries that ensure protection of personal data in a manner equivalent to the protection provided by the legislation of the Czech Republic.

The Provider has implemented the following data security procedures: Technical measures consist in the application of technologies that prevent unauthorized access to the User's data by third parties, particularly the use of firewalls, updated antivirus programs, etc. Operational systems in which personal data are processed and operational premises where personal data are processed are protected physically and electronically, in particular by means of controlled entry and access.

## **COOKIES**

The Provider uses cookies, which are small text files that identify users of the Provider's website and record their user activities.

The text in a cookie file is often made up of a series of numbers and letters that uniquely identify the User's computer, but do not provide any specific personal information about the User. A cookie usually contains the name of the domain from which it was sent, information about age and an alphanumeric identifier.

The Provider's website automatically identifies the User's IP address. The server records all this information in an activity file, which allows subsequent data processing. The Provider also records the request from the browser and the time of the request, the status and the amount of data transferred within this request. It also collects information about the browser and computer operating system used and their versions. It also records the web pages from which you accessed the Provider's

website. The IP address of your computer is stored only for the period of time the website was used and then only for as long as necessary. After the expiration of these periods, the IP address is deleted or anonymized by truncation.

### **Type of cookies and similar technologies**

Technical cookies and similar technologies: based on its legitimate interest, the Provider uses technically cookies that are necessary for the operation of the website and to ensure its functionality. These cookies may be persistent or session cookies. A persistent cookie remains on your hard drive even after you close your browser. Persistent cookies may be used by the browser during subsequent visits to the Provider's website. Persistent cookies can be deleted. Session cookies are temporary and are deleted once the browser is closed. These data are used by the Provider to operate the website, to identify and resolve errors, to determine the use of the website and to make adjustments or improvements. These purposes are based on the Provider's legitimate interest in the processing of the data pursuant to Article 6(1)(f) of the GDPR.

The User can set his/her browser to block these cookies. The Provider warns that in this case certain parts of the website will not work.

### **With the User's permission, the Provider uses additional cookies:**

Analytical cookies and similar technologies: these cookies help the Provider to analyze how Users use the website. They may be used, for example, to measure and improve the performance. For example, these cookies allow to determine how the User arrived at the website, whether directly, through a search engine or via a link on a social network. In addition, the Provider learns how long Users stay on the website and what links they click.

These cookies are set on the User's device only if he/she gives his/her consent to do so during his/her first visit to the website (pursuant to Article 6(1)(a) of the GDPR). Analytical cookies can be refused at any time by simply making the appropriate change in the Detailed Cookie Settings.

Advertising cookies and similar technologies: advertising cookies allow advertising to be displayed based on the User's preferences. They can be used, for example, to allow the Operator to create a profile of the User's interests and to display relevant advertisements to the User.

These cookies are used on the User's device only if he/she gives his/her consent during his/her first visit to the website (pursuant to Article 6(1)(a) of the GDPR). Advertising cookies can be refused at any time by simply making the appropriate change in the Detailed Cookie Settings. If the User does not give his/her consent, he/she will not receive content and advertisements tailored to his/her interests.

To obtain and manage the User's consent, the Provider uses the Google Analytics. The platform collects device information, browser information, anonymized IP address, date and time of visit, URL requests, web path and geographical location. This allows

the Provider to inform the User about the Provider's web environment and to obtain, manage and document the User's consent. The legal basis for data processing in this case is Article 6(1)(c) of the GDPR, since the Provider is legally obliged to provide proof of consent in accordance with Article 7(1) of the GDPR. The data will be deleted as soon as they are no longer needed for logging and there are no legal requirements for retention. For more information on data protection at the platform provider, please visit: <https://www.cookiebot.com>

## RIGHTS OF USERS

You have the following rights regarding your personal data:

- You have the right to know why your personal data is needed, what will happen to it and how long it will be kept.
- Right of access: You have the right to access your personal data that is known to us.
- Right to rectification: You have the right to add, correct, delete or block your personal data whenever you want.
- If you give us your consent to process your data, you have the right to withdraw this consent and have your personal data deleted.
- The right to transfer your data: You have the right to request all your personal data from the administrator and transfer them in their entirety to another administrator.
- Right to object: you can object to the processing of your data. We follow this unless there are legitimate reasons for processing.

## FINAL PROVISIONS

The Provider may update this Privacy Policy from time to time. The current version of the Privacy Policy will always be available on the Provider's website. In case of a material change in the way personal data are handled in this Privacy Policy, the Provider will inform the User by visibly posting a notice prior to the implementation of such changes.

Last update: 21 June n2024