



## PRIVACY POLICY

BEKA ASSET MANAGEMENT,  
SGIIC, S.A.

## ▼ INTRODUCTION

In compliance with the Regulation (EU) 2016/679 of the European Parliament and Council, of 27th April 2016, this Privacy Policy establishes the terms of use and protection of information provided by clients or interested parties. The Company is committed to the security of personal data. When we request personal information to identify you, we guarantee that it will only be used in accordance with the terms provided in this document.

Our commitment is to keep your information safe. We use systems and we update them to guarantee that information is not accessed without authorisation.

## ▼ RESPONSIBLE FOR THE TREATMENT

We inform you that the entity responsible for the treatment of your data is Beka Finance, SV, S.A., hereinafter THE COMPANY.

Corporate name: BEKA ASSET MANAGEMENT, SGIC, S.A.

VAT No.: A41924606

Its registered office is located in: C/ Serrano, 88, 7ª planta, Madrid

Registered in the Companies House of Madrid, Volume 21.463, Folio 46 – Page M-226678, Inscription 2

13.857, Folio 83, Seccion 8 – Hoja M-226678, Inscripción 2.

You may contact us by:

Telephone: +34 91 048 00 60

E-mail: [lopd@bekafinance.com](mailto:lopd@bekafinance.com)

## ▼ GATHERED INFORMATION AND ITS PURPOSE

The information we gather is necessary to establish contractual relationships and/or offer you information about activities, products or services related to THE COMPANY.

We inform you that the personal data that the client or interested party provides, as well as those that he/she may provide in the future within the relationship with this COMPANY, refers to:

Purpose: contractual relationships.

Information of the following types of personal data might be gathered:

- Identification and contact details
- Information required to prevent money laundering, including bank and economic details.
- Information required for the stock market regulation to assess the investment goals, and investment knowledge and experience.
- Information derived from operations in financial instruments or investment services in which THE COMPANY has been involved.
- Identification codes or keys to access and operate within the systems of the COMPANY.
- Data derived from the operations done.

Purpose: commercial activity and other notifications.

The personal data gathered are the identification and contact details required to provide information. For example, including but not limited to: name, surname, post address, telephone or e-mail, depending on the indications on reception preferences and shipping alternatives available.

The notifications about activities, products or services may be done by any mean, including electronic means. The interested person shall authorise the shipping of commercial notifications explicitly, by ticking the corresponding boxes, in any of the forms requesting details, for example, those included in our website.

▼ DATA PRESERVATION

The personal data provided shall be kept while they are needed to meet the contractual relationship, respond to petitions or requests done, and in any case while the interested party does not request they are deleted, as well as for the period of time required to comply with the legal obligations that may correspond in each case in accordance with the type of data. The interested party may exercise his/her rights at any time, as well as make a request about them.

Based on the obligation derived from the Act on Prevention of Money Laundering and Financing of Terrorism, THE COMPANY will keep the personal data for a period of 10 years from the termination of the business relationship.

## ▼ RECIPIENTS

The potential recipients to which THE COMPANY may give the personal data are:

- Public and private entities and institutions with which there is a legal obligation to provide them.
- Third-party service providers with which there is a contract to treat the data.

We will not transfer your personal data to a third company that wants to use them for direct marketing actions, or similar activities.

## ▼ INTERESTED RIGHTS

All people have the right to obtain confirmation about if THE COMPANY is treating personal data concerning it or not. Regarding the data obtained and according to its availability and exceptions when they are limited by the applicable legislation, you are granted the following rights:

- Access right: the right to be informed and request access to the personal data about you that we process.
- Rectification right: right to request that we correct or update your personal data, when they are inaccurate or incomplete.
- Right to delete or elimination: the right to request that your personal data is deleted;
- Right to limit the treatment: the right to temporarily or permanently stop the processing of all or part of your personal data.
- Right to transfer data: the right to request a copy of your personal data in an electronic format and the right to transfer such data to use them in a third-party service.

Opposition right: right to oppose that the entity responsible treats the personal data in the following cases: the data is treated based on a mission of public interest or legitimate interest, including the creation of profiles or the treatment whose purpose is direct marketing, also including the abovementioned creation of profiles; and

Right not to be subject to automated decision making: the right not to be subject to decision making is only based on automated decision making, which includes the creation of profiles, when the decision can have a legal effect on you or cause a similar important impact.

The interested party will be able to exercise these rights by sending an e-mail to the address [lopd@bekafinance.com](mailto:lopd@bekafinance.com) duly identifying himself/herself by sending a photocopy of the ID card and clearly stating the right he/she would like to exercise. Likewise, he/she will be able to request it by post to the address mentioned above.

Finally, we inform the interested parties that they may submit a claim related to the treatment of their personal data before the Control Authority ([www.aepd.es](http://www.aepd.es)).

#### ▼ INTERNATIONAL TRANSFER

In some cases, it is possible that THE COMPANY has to use the service of third parties established out of Spain. If this is the case, THE COMPANY guarantees that the transfer of data is done to countries with an equal level of data protection to that in the European Union or, if this is not the case, it will use the mechanisms established by the legislation in force to receive the acceptance from the client or the authorisation from Agencia Española de Protección de Datos (Spanish Agency for Data Protection) to transfer the data.

#### ▼ MINORS

Minors wanting to register in our systems will not be accepted. An authorisation from parents or tutors will be required for services to be rendered to minors by THE COMPANY.

#### ▼ SECURITY

THE COMPANY has taken the technical measures required to avoid the alteration, loss, treatment or non-authorised access to the personal data provided by the user. Nevertheless, and in case an improper access to the data takes place which may imply negative severe consequences for the interested parties, THE COMPANY will conveniently inform the interested parties in a reasonable period of time, so they take the steps they consider appropriate, and if required, the AEPD will be informed.