



## **DATA PROTECTION REGULATION**

- When establishing a business relationship White Bridge Asset Management d.o.o. for the management of alternative investment funds, with its registered office in Osijek, Šetalište P. Preradovića 3 (hereinafter: the Company) is obliged to collect personal data of investors as well as data on the source of invested funds. The Company collects and processes data based on:
  - Law on Alternative Investment Funds (NN 21/18 I 126/19) and related regulations,
  - Law on the Prevention of Money Laundering and Terrorist Financing (NN 108/2017 I 39/19) and its implementing regulations
  - General Tax Law and or other tax regulations and reporting obligations of the Company to the amenable tax authority in accordance with the Agreement between the USA and the Republic of Croatia on improving tax compliance at the international level and law enforcement FATCA and Directive 2014/107/EU amending Directive 2011/16/ EU regarding the mandatory automatic exchange of information in the field of taxation (Directive 2014/107 EU or CRS).
- The collected data is used to establish a business relationship, actions related to the issuance and redemption of shares, in-depth analysis of investors and fulfillment of other obligations arising from the above regulations.
- The Client gives his consent to the processing of personal data by signing the Application for issuance of shares, Investor Questionnaire, Investor Qualification Statement, Investor Crypto Account Setup Form, Beneficiary Owners Data and Questionnaire for Politically Exposed Persons.
- Investors data are available to data processors.
- The personal data of investors during transactions are shared with the Depository, whose one task is to ensure the issuance, redemption and payment of the fund's shares in accordance with laws, regulations adopted on the basis of law and other applicable regulations and documents of the fund.
- The period for personal data storage is prescribed by the above laws.
- The Company may provide some or all data for use to state or other bodies with public authority, in accordance with their legal powers, including, but not limited to, the Croatian Financial Services Supervisory Agency, the Croatian National Bank, the Personal Data Protection Agency, the Office for prevention of money laundering and tax authorities of the Republic of Croatia, as well as that the said bodies, in accordance with their legal powers, may provide the data thus obtained for use to other competent authorities in the Republic of Croatia and / or abroad. The Company may entrust certain personal data processing tasks to third parties, which includes the possibility of exporting data outside the Republic of Croatia for the purposes of their processing, all under the conditions prescribed by the Personal Data Protection Act and / or other regulations governing personal data protection.

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## Personal data for individuals:

1. Name and surname
2. Date and place of birth
3. Gender
4. Country of residence.
5. Address of residence(contact address if other than residence)
6. ID/passport details
  - a. document number
  - b. issuer
  - c. date of issue
  - d. expiration date
7. OIB/TIN
8. Phone number
9. Email address
10. Investor designation
11. IBAN of current, giro or foreign currency account
12. Data from the Questionnaire – in accordance with the Law on Prevention of Money Laundering
13. Data on political exposure
  - a. Personal employment status
  - b. Type of employer
  - c. Calling
  - d. Current occupation
  - e. Source of investment funds
  - f. Range of investment funds

## Personal data for legal entities:

1. Company name
2. OIB
3. MB
4. LEI
5. Country of establishment
6. Address
7. Contact phone
8. Contact email address
9. Company IBAN bank account

## Personal data of the director

- a. Name and surname
- b. OIB
- c. Identity card / passport data
- d. Date of birth
- e. Address

**Personal data on the person authorized to place the order - if different from the director**

- a. Name and surname
- b. OIB
- c. Identity card / passport data
- d. Date of birth
- e. Address
- f. Data on political exposure

**Personal crypto wallet information**

- a. Crypto accounts
- b. Master Public Key (MPK)

The Company is obliged to keep personal data of clients in accordance with the Capital Market Act, the Act on the Prevention of Money Laundering and Terrorist Financing, the Accounting Act and other tax laws and bylaws. After they expire, personal customer data is destroyed. The Investor may at any time request access to his data and correction of inaccurate data in writing or in person at the Company's headquarters. The data collected on the basis of the above laws and their implementing regulations are mandatory in order for the Company to be able to fulfill its legal and regulatory obligations and establish a business relationship with the investor. If the investor does not wish to disclose information that is mandatory or discloses such inaccurate information, the Company may refuse to establish a business relationship with the investor. In the event that certain data are processed for a particular purpose with the consent of the investor, the investor may withdraw from the given consent and notify the Company in writing or in person at the Company's headquarters.

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