

# Data Protection Policy of Stefnir hf.

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## 1. Data Protection Policy of Stefnir hf.

The role of Stefnir hf. (Stefnir) is to manage its clients' assets as best serves their interest. This entails the processing of personal data. The Data Protection Policy is based on the provisions of the Data Protection Act No. 90/2018 and of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data. The following text describes what kind of personal data Stefnir collects, for what purpose it is collected, how long the data is retained for, where the data can be shared and how data security is guaranteed.

## 2. Data controller

Stefnir hf., ID-No. 700996-2479, Borgartún 19, 105 Reykjavík, is the data controller. Stefnir hf. is a UCITS management company and an alternative investment fund manager. The company operates under the supervision of the Financial Supervisory Authority and has an operating licence for fund management, investment advisory and asset management. The company's operations are governed by Act No. 128/2011 on Undertakings for Collective Investment in Transferable Securities (UCITS) and Act. No 45/2020 on Alternative Investment Fund Managers. The company is listed in the register of companies, the Icelandic Business Information Centre and the FME's register of regulated entities.

Further information about Stefnir can be seen on the company's website, [www.stefnir.is](http://www.stefnir.is). Any queries about the company can be sent to [info@stefnir.is](mailto:info@stefnir.is).

## 3. Types of personal data

The types of personal data processed by Stefnir are typically financial data and general demographical data. The processing of personal data may be necessary on the basis of an agreement with a customer, provisions of the law, or in the company's legitimate interests. The Bank is also legally obliged to possess specific personally identifiable data, i.e. in compliance with the provisions of the Measures against Money Laundering Act, the Accounting Act and for the purpose of disclosure to public authorities.

## 4. Objective of processing personal data and authority to process

The main objective of processing personal data is to provide customers with the requested services, e.g. in fulfilment of an agreement or to meet the legal requirements applicable to the service or processing.

The authority to process personal data could be, for example, in fulfilment of an agreement, due to legal obligations or the company's legitimate interests, particularly with respect to maintaining the security of its IT systems and the data being processed. If information is acquired from a third party, this is done with the authority of the customer and it is disclosed where the information originates.

If Stefnir intends to process the personal data further and for a different purpose from which it was originally collected, the person will be informed of this purpose before processing commences, as applicable.

## 5. Data retention period

Data is retained for as long as necessary, taking into account the purpose of processing the data and the terms of relevant agreements, unless the law and regulations require the data to be retained for longer.

## **6. Sharing personal data**

Stefnir will not share personal data unless the company is required to do so by law or a court order. The customer can permit Stefnir to share personal data. Data is, where applicable, sent to processors who process the data for Stefnir or perform related tasks. Anyone providing data concerning business dealings and/or private concerns of customers of Stefnir is bound by the same obligation of confidentiality as applicable to the company.

## **7. Security of personal data**

Stefnir is obliged to guarantee the security of the personal data it processes. Stefnir fulfils the obligation by assessing the risk involved in the processing of data, e.g. the risk that unauthorized persons may gain access to the data or the data gets damaged or destroyed, and Stefnir therefore takes measures to mitigate such risk. The security measures mainly involve access management, physical security, personnel security, operating security and communications security. The company has internal controls in place and the company's risk assessment is reviewed on a regular basis.

## **8. Customers' rights**

A person is entitled to request access to their own personal data and in certain circumstances to have it corrected, destroyed or restrict the processing of it. A person is also entitled to submit a complaint to the Icelandic Data Protection Agency.

## **9. Contacts**

Stefnir hf. can be contacted by phone on (+354) 444 7000 or by e-mail [info@stefnir.is](mailto:info@stefnir.is)

Stefnir's data protection officer can be contacted by e-mail at [personuverndarfulltrui@stefnir.is](mailto:personuverndarfulltrui@stefnir.is). The role of the data protection officer is to monitor compliance with the provisions of the Data Protection Act No. 90/2018 and the General Data Protection Regulation (EU) 2016/679.

## **10. Updating the Data Protection Policy**

The Stefnir is permitted to amend this Data Protection Policy and add to it at any time and such amendments come into effect without notice. Such amendments may be made, for example, to bring the Data Protection Policy into line with current data protection legislation and regulations at any given time. All changes to the policy will be published on the company's website, [www.stefnir.is](http://www.stefnir.is).

Approved by the board of directors of Stefnir hf.

20<sup>th</sup> of May 2021

\*The documents released on this part of the company's website are a translation of the original documents, written in Icelandic. In the case of any discrepancy between the English and the Icelandic texts, the Icelandic versions shall prevail and questions of interpretation will be addressed solely in the Icelandic language.