

Last update: 22/07/2021

Data Protection Statement

EIF Corporate platforms (under OIM management)

Personal data are processed by the European Investment Fund ("EIF" or "**Controller**") in accordance with Regulation (EU) 2018/1725 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, as such regulation may be amended from time to time.

1. Legal Basis

- eFront, SAS, Tableau, Alteryx and M-Files: The legal basis for this processing is the public interest pursued by the OIM Department supporting EIF's mission to "contribute to the pursuit of the objectives of the European Union" (Art. 2 of the EIF Statutes).

2. Data Subjects

- Counterparties, legal representative of counterparties
- EIF sub-contractors staff and EIF staff as users
- Any personal data subject that may be covered by corporate dataset or document managed within these platforms

3. Purpose

- eFront is storing personal data in the context of Customer Relation Management (CRM), Compliance/KYC, Portfolio input and inclusion, Reporting to mandators
- M-Files is the content management platform that encompasses the management of the complete lifecycle of EIF corporate documents. The purpose of processing personal data is determined by the type and content of each document stored in the platform falling under the responsibility of the document originator/owner
- SAS: Analytical platform on SAS used to monitor Guarantees deals underlying portfolios and third-parties mandates treasury
- Tableau: Data visualization and dashboard platform based on Tableau to cover EIF dashboards and reporting needs. The platform is fed with data available in source application in eFront and SAS.
- Alteryx : Data discovery, preparation, analysis and preparation platform based on Alteryx to cover EIF data analysis and processing needs. The platform is fed with data available in source application like eFront or SAS

4. Data Categories

- eFront:
 - For contacts: salutation, first name, last name, contact code in eFront, company, department, position, date of birth, nationality-ies, Phone numbers, email addresses, standard mail addresses, , tax domiciliation, previous jobs, social network, compliance control information (including data-providers ID such WorldCheck ID, ...).
 - For users: Salutation, first name, last name, abbreviation, eFront login, professional email, previous jobs, ID employee, department, position
- M-Files: Name, Surname, email address, Phone number, Date of birth, Signature.
- SAS, Tableau and Alteryx: Name, Surname, Email

5. Data Recipients

- eFront: Personal data captured within eFront are disclosed to EIF internal services, EIB KYC, EIB IA, EIB IG/IN, EIB GEEREF team for a limited scope of data and EIB Climate & Infra Funds team for a limited scope of data

- M-Files: EIF internal services. Exceptionally the access to specific documents may be granted to admin users for well-defined interventions upon authorization from the EIF controlling service
- SAS, Tableau and Alteryx: EIF internal services.

6. Data Retention Period

Up to 20 years as a principle, however there's an ongoing initiative trying to reach a comprehensive retention plan/schedule for EIF records (focused on documents).

7. Rights of Data Subject

- Data Subjects have the right to obtain from the controller confirmation as to whether or not their personal data concerning are being processed, and, where that is the case, access their personal data by contacting the Controller (info@eif.org) or through the EIF DPO (dpo@eif.org) and they will receive a response without undue delay (**right of access**);
- Data Subjects have the right to obtain from the controller without undue delay the rectification of any inaccurate personal data concerning them (**right to rectification**).
- Data Subjects have the right to obtain from the controller the erasure of their personal data when they are no longer necessary in relation to the purposes for which they were collected (**right to erasure**);
- Data Subjects have the right to obtain from the controller restriction of processing when (i) they contest the accuracy of their personal data, (ii) the processing is unlawful, (iii) the controller no longer needs the personal data for the purposes of the processing or (iv) they have objected to processing, pending the verification whether the legitimate grounds of the controller override theirs (**right to restriction of processing**);
- Data Subjects have the **right to object**, on grounds relating to their particular situation, when the processing of personal data is unlawful;
- Data Subjects have the right to receive from the controller their personal data in a structured, commonly used and machine-readable format and transmit those data to another controller without hindrance from the controller to which the personal data have been provided (**right to data portability**);
- Data Subjects may lodge a complaint to the European Data Protection Supervisor (www.edps.europa.eu) at any time (**right to lodge a complaint**).