

# Allianz Global Investors informs



## Client Representative Privacy Notice

For Allianz Global Investors GmbH, registered at Bockenheimer Landstrasse 42-44, 60323 Frankfurt, Germany, and its subsidiaries and branches („AllianzGI“ or „we“), the protection of privacy and personal information (i.e. any information relating to an identified or identifiable individual person, „Personal Data“) is an important concern to which we pay special attention within all our business processes. We believe in transparency and are committed to being upfront about our privacy practices, including how we treat Personal Data.

This Client Representative Privacy Notice describes how the AllianzGI entity processes Personal Data of legal representatives/agents/contact persons („Representatives“) of customers and business partners („Clients“) who have entered or will enter into a contractual arrangement with AllianzGI to obtain our services. It sets out how and which kind of Personal Data AllianzGI may obtain, how AllianzGI uses, shares and protects such data, the rights of Representatives with respect to the data, and how to contact AllianzGI about our privacy practices.

Information about the processing of Personal Data collected when visiting our websites can separately be found in the Privacy Statement on our websites.

### 1. Who we are

Allianz Global Investors GmbH is responsible for the processing of Personal Data of Representatives for own purposes (for example to conclude or perform a contract with a Client).

Moreover, other entities of AllianzGI could become responsible for the processing of Personal Data of Representatives, for example, for the purpose of marketing their own offerings. A list of all AllianzGI entities with respective contact details is available under <https://www.allianzgi.com/en/our-firm/contact-us>.

To the extent two or more AllianzGI entities process Personal Data of Representatives in a joint manner, we kindly ask you to address any queries you may have directly to the contact person whose details are set out in Section 12. The respective contact person will then forward your query to the AllianzGI entity that is primarily responsible, if necessary.

### 2. Personal data obtained about Representatives

AllianzGI will obtain Personal Data of Representatives when it enters into contracts with Clients and in connection with maintaining AllianzGI's Client relationships and providing services to Clients. If Clients provide us with Personal Data of their Representatives, they have a legal obligation to inform the Representatives about this and obtain their consent, where legally required.

AllianzGI will also obtain Personal Data of Representatives from publicly available sources (for example from a Client's website in anticipation of a prospective client relationship).

### 3. The types of Personal Data we may obtain

We will obtain the following types of Personal Data about Representatives:

- Representatives' names, postal or e-mail addresses, fax numbers, and phone numbers;
- Employment information (e.g., job titles);
- Gender, age, nationality, date and place of birth;
- Representatives' communication preferences (e.g. postal, by phone or email).

As a matter of practice, we will not collect any sensitive Personal Data (for example data concerning health, racial or ethnic origin or political opinions) relating to Representatives. If there is a need for AllianzGI to process such sensitive Personal Data, AllianzGI will obtain the Representative's prior consent through the relevant Client of AllianzGI and only process such data in compliance with applicable data protection laws and regulations.

### 4. How we use the Personal Data obtained

AllianzGI will use the Personal Data of Representatives to:

- Manage existing and prospective Client relationships (e.g. in relation to the conclusion or fulfilment of an contract);
- Communicate with Representatives (for example, about services we offer or intend to offer or in connection with events, Client reporting, also by way of sending newsletters, advertisements, surveys and information about promotions);
- Perform accounting, auditing, and billing activities
- Safeguard and defend AllianzGI's interests (for example where it is necessary to investigate, prevent or take action regarding (suspected) illegal activities, situations involving potential threats to the safety of any person or potential harm to AllianzGI including but not limited to fraud prevention and detection);
- Meet any legal obligations (for example, tax, accounting and administrative obligations, prevention of terrorism financing law, anti-money laundering law (such as carrying out customer due diligence) and industry standards;
- Comply with law enforcement requests or discovery procedures, or where required or permitted by applicable laws, court orders, government regulations, or government authorities.

### 5. With whom we may share Personal Data

AllianzGI shares the Personal Data with:

- Entities within the AllianzGI Group (please find an overview under <https://www.allianzgi.com/en/our-firm/contact-us>) or Allianz where this is reasonably necessary or desirable (e.g. for purposes of fraud prevention or marketing, where legally permitted);
- Service providers that AllianzGI has retained to perform services on its behalf, such as IT or service providers; these service providers are not permitted to use the Personal Data for their own purposes but are required to solely process the data upon instructions received from AllianzGI;
- Law enforcement or other government authorities, if required by law or where reasonably necessary to protect the rights, property, and safety of others or ourselves;
- Other parties in the event of any contemplated or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of AllianzGI's business, assets or stock (including in any insolvency or similar proceedings), if applicable.

In doing so it goes without saying that AllianzGI complies with all applicable data protection laws and regulations.

### 6. Legal bases for the processing of Personal Data

We process Personal Data of Representatives only where permitted by applicable legal bases, such as:

- Where the processing is necessary for the performance of a contract with a Representative or in order to take steps at the request of a Representative prior to entering into a contract;
- Compliance with a legal obligation to which we are subject (for example, where we are legally obliged to retain certain Client-related data);
- Where the processing is necessary for our legitimate interests unless these are overridden by your own legitimate interests; our legitimate interests include – as the case may be – the following:

- Conducting business with a Client through communicating with you as a Representative;
- Marketing purposes, for example to provide you with offers more tailored to the Client's business;
- Protecting Allianz and/or its employees from harm, by preventing or detecting illegal activities, suspected fraud or situations involving potential threats to the safety of any person or potential harm to AllianzGI;

To the extent this is required by applicable data protection laws and regulations, we will separately ask you for your consent and provide information as to what happens if you do not give consent.

## **7. Where we process Personal Data**

The Personal Data of Representatives will be processed both inside the European Union ("EU") and the European Economic Area ("EEA") and outside by the parties specified in Section 5 above, subject always to contractual restrictions regarding confidentiality and security in line with applicable data protection laws and regulations. We will not disclose such Personal Data to parties who are not authorized to process them.

Please note that EU / EEA Member States and other countries all have different laws regarding the protection of Personal Data. When your Personal Data is transferred from your own country to another country, the laws and rules that protect your Personal Data in the country to which your information is transferred to can be different (or less protective) from those in the country in which you reside. For example, the circumstances in which law enforcement can access Personal Data may vary from country to country.

When transferring Personal Data internationally we make sure that we comply with applicable data protection laws and regulations, for example, by entering into agreements which will ensure that the recipients of your Personal Data maintain an adequate level of data protection (for example by implementing so-called Standard Contractual Clauses approved by the EU Commission).

Whenever we transfer your Personal Data within the Allianz Group to an OE outside of the EU / EEA, we will do so on the basis of Allianz' approved binding corporate rules known as the Allianz Privacy Standard ("Allianz' BCR") which establish adequate protection for Personal Data and are legally binding on all Allianz Group companies. Allianz' BCR and the list of Allianz Group companies that comply with them can be accessed here : <https://www.allianz.com/en/info/privacy-statement/>.

We will also disclose your Personal Data to foreign governmental agencies or entities, regulatory authorities, or other persons in line with any applicable law, regulations, court order or official request, or under any and for the purposes of any guidelines issued by regulatory or other authorities, or similar processes as either required or permitted by applicable law (see above).

## **8. How we protect Personal Data**

AllianzGI maintains appropriate technical and organizational security safeguards designed to protect Representatives' Personal Data against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure, or use.

All our employees are bound by data secrecy. Only authorised employees may process your Personal Data based on the "need-to-know" principle.

## **9. How long we retain Personal Data**

AllianzGI stores Representatives' Personal Data for as long as necessary to fulfil the purposes for which the data was collected or to fulfil legal obligations. Afterwards, AllianzGI will delete the Personal Data.

## **10. Representatives' Rights**

Representatives' rights under applicable data protection laws and regulations include access to the Personal Data AllianzGI processes about them, the right to have such Personal Data corrected, erased or blocked, the right to restrict the processing of Personal Data, and the right to object to certain data processing activities (on specific grounds relating to your particular situa-

tion that override our compelling legitimate grounds for the processing), as well as the right to data portability, the right to withdraw consent at any time where your Personal Data is processed with your consent (without affecting the lawfulness of processing based on consent before its withdrawal), and the right to lodge a complaint with the respective AllianzGI entity and/or the competent data protection authority. To exercise these rights, Representatives should make a request (in written or electronic form) using the contact details set out below.

Representatives also have the right to object to the processing of their Personal Data for direct marketing (for example in relation to the receipt of newsletters) at any time with effect for the future by using the below contact details.

## **11. Updates to this Client Representative Privacy Notice**

AllianzGI may update this Client Representative Privacy Notice from time to time. We will notify Clients of any significant changes to this Client Representative Privacy Notice on the relevant AllianzGI websites or through other appropriate communication channels, such as emails to the Representatives or via a request to the Clients to inform their Representatives of such changes. All changes shall be effective from the date indicated on the updated Client Representative Privacy Notice, unless otherwise provided in the notification.

## **12. How to contact us**

Comments or inquiries about this Client Representative Privacy Notice, requests to update information we have about Representatives, or requests to exercise Representatives' rights shall be sent to the responsible Data Protection Officer by e-mail to the following email-address: [dataprivacy@allianzgi.com](mailto:dataprivacy@allianzgi.com). Requests can also be sent by postal mail to Allianz Global Investors GmbH, attention: Data Protection Officer, Bockenheimer Landstrasse 42-44, 60323 Frankfurt, Germany.