



Tuleva Privacy Policy and Terms of Use of Website

Tuleva Privacy Policy

This Privacy Policy describes how Tulundusühistu Tuleva (registry code 14041764, address Telliskivi 60, 10412 Tallinn; hereinafter **Association**) and its wholly owned subsidiary Tuleva Fondid AS (registry code 14118923, address Telliskivi 60, 10412 Tallinn, hereinafter **Management Company**, jointly with the Association also referred to as **Tuleva**) as data controllers process your personal data.

We are glad that you are interested in our services. Protecting personal data is important to us, and we take it very seriously. We process your personal data in compliance with our obligations under the applicable European Union and Republic of Estonia legislation, and we follow the principles of secure data processing.

What personal data do we collect?

Tuleva mainly collects and processes data on persons who have entered into or have expressed an intention to enter into contractual relationships with Tuleva (members of the Association, unit-holders of Tuleva funds) and/or use the pension.tuleva.ee web application.

The **Pension.tuleva.ee** web application can be used by everyone who has joined the Estonian pension system. When a person logs into the web application, Tuleva makes an inquiry with the Estonian Funded Pension Registry and thereby collects and stores the following categories of personal data:

- a) the person's pension account number;
- b) the pension fund to which the person makes mandatory funded pension contributions;
- c) a balance statement of the person's pension account;
- d) an account statement of the person's pension account;
- e) a list of applications made to the pension register;
- f) the fact of logging in to the web application (the person's first name and surname, personal identification code, time of logging in, telephone number, email address)

Based on the above information, Tuleva views the pension account information of the person that logged in to the web application. If a person wants to submit a choice application and/or an application for changing units, this can be done in the web application, and Tuleva will send the digitally signed application(s) directly to the pension registrar.

The **Management Company** maintains a register of the pension funds' unit-holders, and the information is obtained from the Estonian Funded Pension Registry maintained by Pensionikeskus AS (registry code 14282597, address Tartu mnt 2, 10145 Tallinn). The



Management Company's register also contains information from the register of members of the Association. The categories of personal data that the Management Company collects and processes include (but are not limited to) the following:

- g) the person's first name, surname and personal identification code;
- h) the person's contact details (email address and telephone number);
- i) information enabling the Management Company to perform due diligence for the prevention of money laundering and terrorist financing, and to ensure compliance with international sanctions, including judging whether the client is a politically exposed person;
- j) financial data, including transactions with units of the Management Company's funds.

To meet its legal obligation, the **Association** maintains a register of its members, i.e. a list that contains the following personal data of the members:

- a) first name and surname,
- b) personal identification code,
- c) email address,
- d) telephone number,
- e) the member's contribution to the initial capital of the Association,
- f) the member's share in the Association's share capital.

Records are also kept of admission to and, where applicable, leaving or expulsion from the Association.

For what purpose and on what legal basis do we use personal data?

Tuleva collects and processes your personal data primarily to establish a customer relationship, offer the Management Company's services, perform statutory due diligence, offer a better customer experience and manage the Management Company's business risks, as well as improve, develop and maintain web applications and technical systems.

Tuleva processes your personal data on the following legal bases:

- a) you have consented to the processing of your personal data;
- a) it is necessary for the preparation or performance of a contract between you and Tuleva;
- b) it is mandatory and necessary for the performance of legal obligations;
- c) it is necessary in the legitimate interest of Tuleva.

When using the **pension.tuleva.ee** web application, the person logging in to the application agrees that Tuleva will place an inquiry with Pensionikeskus AS about the pension account of the user of the application. Tuleva uses the data obtained from the Estonian Funded Pension Registry based on the person's consent and in the legitimate interest of Tuleva for the following purposes:

- a) The fact of logging in to the application together with the login details (first name, surname, personal identification code) are used for statistical and analysis purposes, as well as for the development, maintenance and troubleshooting of the web application.
- b) The fact of logging in to the application together with the login details (first name, surname, personal identification code) are used to determine whether or not the person is a unit-holder of pension funds managed by the Management Company.
- c) The person's contact details (email address and telephone number) are used to send the person an application completed in the web application or, if necessary, to contact them regarding any problems using the web application.
- d) If the person has submitted and signed in the web application a choice application and/or an application for changing units, the person's contact details are also used to transmit the Management Company's general announcements and news, and for providing financial services.

The **Management Company** processes the customer data in the register on the basis of its legitimate interest and the performance of a contract for the following purposes:

- a) the person's first name, surname and personal identification code are used to identify the customer;
- b) the first name and surname, personal identification code and financial data of the person are used for due diligence purposes for the prevention of money laundering and terrorist financing;
- c) the contact details of the person (email address and telephone number) are used to transmit the Management Company's general announcements and news and to offer financial services to the customer.

The purpose of the register of members of the **Association** is to record the number of members, i.e. owners of the Association, and the membership capital belonging to them. The Management Company maintains the list of the Association members in the name and under the authorisation of the Association. Furthermore, the Association uses the contact details of its members to keep them informed of the Association's activities and results and to involve members in the activities of the Association as appropriate.

According to the Articles of Association, the members of the Association must have directed their mandatory or voluntary funded pension contributions to a pension fund of the Management Company, except during the period when the Management Company has no registered mandatory or voluntary pension funds. To verify the fulfilment of this obligation, the Management Company regularly compares the Association members' register with the list of unit-holders of the funds managed by the Management Company based on the legitimate interest and authorisation of the Association. As a result of the comparison, the Management Company forwards to the Association a list of members who have exchanged funds or redirected payments elsewhere based on an application for exchanging units or a choice application during the previous period.

Who do we share your personal data with?

We will only disclose the personal data you provide to us to third parties if this is strictly necessary for the provision of our services and only to the extent required for the processing of



personal data. This means that we involve partners in our activities, to whom we disclose your personal data for the purposes related to the activities and services of the Association or the Management Company and/or our information activities. Your personal data will not be transmitted to third parties for any other purposes. Any third party to whom we transmit your personal data may use and process such data only for the purposes and in the manner set forth in this Privacy Policy.

As a rule, personal data are processed in the countries of the European Union or the European Economic Area. For announcements and news related to the Association and the Management Company, we will transmit email addresses to our partner MailChimp (The Rocket Science Group LLC d/b/a MailChimp), which stores the data on its server in the United States of America. The security of the processing of personal data transmitted to the US by MailChimp is ensured by the Privacy Shield data protection framework applied between the European Union and the US.

In addition to the above, we may transfer your personal data to third parties if this is necessary to fulfil our legal obligation or exercise our rights.

When will personal data be deleted?

The personal data of the members of the Association are processed until the person leaves or is expelled from the Association. Records are then kept on whether and when the person was a member of the Association. The register data on the unit-holders of pension funds managed by the Management Company are updated every week. The Management Company retains the personal data of unit-holders only for as long as necessary to fulfil the purpose for which the personal data are processed, unless the Management Company has a legal obligation to store the personal data for a different period.

How can you exercise your rights regarding the processing of your personal data?

If you want to:

- access your personal data that the Association and/or the Management Company processes within the framework of their activities,
- have any incorrect and/or outdated personal data corrected and/or supplemented,
- have your personal data deleted and/or its processing restricted or terminated, and any disclosed personal data deleted if further processing is not permitted under applicable law, or object to the processing of your personal data,
- request that your data be transferred to another controller in accordance with applicable law,
- object to our processing of your personal data, or
- place any other requests related to our processing of your personal data, or if you need further information about such processing,

please contact us by email at tuleva@tuleva.ee.



If you believe that we have processed your personal data unlawfully or violated your rights regarding the processing of your personal data, please let us know at the above email address. We prefer to resolve any disagreements related to the processing of personal data through negotiations first. You also have the right to file a complaint with the Estonian Data Protection Inspectorate (website: www.aki.ee).

How do we ensure the security of your personal data?

The Association and the Management Company store and process your personal data on digitally and physically secure servers. All personal data processed by us and our partners will be accessible only to our employees and the employees of our partners who need such data for the performance of their duties in connection with the purposes set out in this Privacy Policy and who are required to comply with personal data protection legislation and this Privacy Policy.

Terms of Use of Tuleva Website

By using the Tuleva website, you confirm that you have read, understood and accepted these Terms of Use.

Information published on the website

We make every effort to ensure that the information published on the website is accurate and complete. The reviews, comments, opinions and analyses published on the website contain our subjective opinions and do not constitute investment recommendations. If you would like more details about the information published, please contact us.

Intellectual property

All information contained on the Tuleva website, including the rights related to the website design and software, are property of the Association and the Management Company. Reproduction of the information contained on this website, including texts, logos, photographs, etc., in any manner whatsoever without our prior written permission is prohibited. You may use the information on this website for non-commercial purposes.

How do we use cookies?

Please note that we use cookies on the Tuleva website based on our legitimate interests. A cookie is a small text file that a website saves on your computer or mobile device when you visit a website. Cookies provide us with statistical information that helps us analyse the behavioural patterns of our website visitors and use them for information purposes. For example, we use cookies to store the IP address of the device you use, which allows us to later present our services and offerings to you through Google and Facebook.



The following cookies are used on the website:

Name	Purpose of the cookie
Google Analytics	An analytical cookie that collects analytical data about website visitors. The data may also be used to target advertising on the Google advertising network.
Mixpanel	An analytical cookie that collects analytical data about website visitors.
Google Tag Manager	A cookie used to manage the cookies placed on a website.
Facebook Pixel	A cookie used to target advertising and track results on Facebook.

The cookies used on the website are divided into session cookies and permanent cookies. Session cookies are automatically deleted after each web visit; permanent cookies are stored for up to two years.

As an internet user, you can prevent or restrict the storage of cookies on your device, and delete all cookies that have been stored on your computer. To do this, you need to change your personal browser privacy settings.

Changes to the Privacy Policy and Terms of Use

This Privacy Policy and Terms of Use are published on the Tuleva website and are effective from 11 November 2021. Any changes and additions to the Privacy Policy will be effective upon the publication of a new version on our website.