

Privacy Policy

BACKGROUND:

Thank you for choosing to be part of LifeGoals Multi-Employer Provident Fund ("**Fund**", "**we**", "**us**", or "**our**"). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please contact us at info@lifegoals.eu. Potential Employers / Members (collectively or individually referred to as "**you**", "**your**") are advised to read this Notice

When you visit our website <https://www.lifegoals.eu> (the "**Website**"), and more generally, use any of our services (the "**Services**", which include the Website), we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.

This privacy notice applies to all information collected through our Services (which, as described above, includes our Website), as well as any related services, sales, marketing or events.

Please read this privacy notice carefully as it will help you understand what we do with the information that we collect.

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Information About Us

The LifeGoals family of products is brought to you by LifeGoals Financial Services Limited, a leading Investment Firm licensed by the Cyprus Securities & Exchange Commission (License Number 232/14). LifeGoals Financial Services Limited is a fully-fledged financial services and investment advisory company, built on world-class professional expertise, integrity and transparency.

The LifeGoals Multi-Employer Provident Fund, a leader in the pension industry, is a registered occupational retirement benefit fund, licenced by the Registrar of Occupational Funds of Cyprus (RN 3263). The Fund utilizes a proprietary online platform managed and administered by LifeGoals Financial Services Limited

For more information please visit our website at <https://www.lifegoals.eu>.

What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.
- b) The right to access the personal data we hold about you. Part 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- d) The right to be forgotten, subject to the limitations set-out in Part 8, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we

have. Please contact us using the details in Part 12 to find out more.

- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 15. Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

What Personal Data Do We Collect?

We collect and process different types of personal data which we receive from Employers and/or our Members (potential and current) in person or via our associates, in the context of our business relationship.

We may also collect and process personal data which we lawfully obtain not only from you but from other entities or other third parties e.g. companies that introduce you to us, or entities that provide information for regulatory compliance (due diligence).

We may also collect and process personal data from publicly available sources (e.g. the Department of Registrar of Companies and Official Receiver, commercial registers, the internet) which we lawfully obtain and we are permitted to process.

If you are a prospective Member or an administrator of the estate of a deceased Member, the relevant personal data which we collect may include:

Name, home address, correspondence address, contact details (telephone, fax, business or personal email), identification data, date of birth, social insurance number, citizenship, gender, employment date (for operational purposes), national identification number according to your nationality, national identification document or passport, authentication data (e.g. signature).

If you are a prospective Employer, the relevant data which collect may include:

Registered name, registration number, Employer Social Insurance Number, registered office address, correspondence address, contact person details (Name, identification document number, business email address and contact telephone number) authentication data (e.g. signature).

When we agree to provide our service to you or the legal entity you represent, then, in the

context of the provision our service, additional personal data will be collected and processed which may include:

Investment strategy and scope, risk appetite, personal objectives, recorded conversations.

The information we collect may further include:

- **Log and Usage Data.** Log and usage data is service-related, diagnostic usage and performance information our servers automatically collect when you access or use our Website and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings and information about your activity in the Website (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps') and hardware settings).
- **Device Data.** We collect device data such as information about your computer, phone, tablet or other device you use to access the Website. Depending on the device used, this device data may include information such as your IP address (or proxy server), device application identification numbers, location, browser type, hardware model Internet service provider and/or mobile carrier, operating system configuration information.
- **Location Data.** We collect information data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type of settings of the device you use to access the Website.

Your obligation to provide us with your personal data

In order that we may be in a position to proceed with a business relationship with you and provide you our service you must provide your personal data to us which are necessary for the required commencement and execution of a business relationship and the performance of our contractual obligations.

We note that if you do not provide us with the required data, then we will not be allowed to commence or continue our business relationship either to you.

How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for the following purposes:

For the performance of a contract : We process personal data in order to our service based on contracts with you but also to be able to complete our acceptance procedure so as to enter into a contract with prospective Employers/Members.

For compliance with a legal obligation: There is a legal obligation under the relevant law (L.10(I)/2020) as well as relevant directives and regulations issued from time to time by the Registrar of Occupational Pension Funds of Cyprus, which we are subject to, to collect and use such personal data..

For the purposes of safeguarding or servicing legitimate interests: We process personal data so as to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. Examples of such processing activities include:

Means and processes undertaken to provide for the security of the Fund's IT and systems, as licenced by LifeGoals Financial Services Limited, preventing potential crime, asset security, admittance controls and anti- trespassing measures.

Initiating legal claims and preparing our defence in litigation procedures.

For other reasons, provided you have given your consent: Provided that you have given us your specific consent for processing (other than for the reasons set out hereinabove) then the lawfulness of such processing is based on that consent. You have the right to revoke consent at any time. However, any processing of personal data prior to the receipt of your revocation will not be affected. This may cover the provision of promotional material for services.

How Long Will You Keep My Personal Data?

We will process your personal data for the entire duration of the business relationship you have concluded with us and for a period of five (5) years after the termination of the business relationship to comply with the applicable anti-money laundering legislation and legal safe-keeping obligations. Further, any personal data will not be retained for longer than the time necessary for satisfying the purposes of its processing, subject to the general statutory limitation periods and the mentioned retention period where the applicable laws require that the personal data is retained for a certain period after the termination of our business relationship with you.

For prospective Employers/Members personal data (or authorized representatives, officers or owners of a legal entity prospective client) we shall keep your personal data for 6 months from the date of conclusion of all communications that didn't lead to the opening of an account with the Fund.

How and Where Do You Store or Transfer My Personal Data?

We store or transfer most of your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

In some cases, we transfer your data to a third party based in the US, but only to parties who are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar to those in Europe. More information is available from the [European Commission](#).

How do we keep your information safe?

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to

defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Website is at your own risk. You should only access the Website within a secure environment.

Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exception. In some limited circumstances, we may be legally required to share certain personal data, which might include yours, for example:

- Supervisory and other regulatory and public authorities, inasmuch as a statutory obligation exists. Some examples are the Registrar of Occupational Retirement Benefits Funds, the income tax authorities and others.
- External legal consultants.
- Auditors and accountants.
- LifeGoals Financial Services Limited which has developed the systems used by the Fund,.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

Do we use cookies and other tracking technologies?

We may use cookies and similar tracking technologies to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email addresses shown in Part 15. There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of two months from the date we receive your request.

Account information

If you would at any time like to review or change the information in your account or deactivate your account, may do so by request via email to info@lifegoals.eu.

For Members: Your Employer is obligated to inform us of any changes in your existing

circumstances (e.g change of employment, death). Upon completion of the relevant process (payout) your account will be deactivated or deleted and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with applicable legal requirements.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Website.

Opting out of email marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list – however, we may still communicate with you, for example to send you service-related emails that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes. To otherwise opt-out, you may either access your account settings and update your preferences or contact us using the contact information provided.

How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please email your request to: dsr@lifegoals.eu or via post to:

LifeGoals Financial Services Limited

12 Demosthenis Severis Ave,
5th Floor, Nicosia, Nicosia 1080
Cyprus

Phone: +357 22449122

Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our Site following the alterations. We recommend that you check this page regularly to keep up to date.