

## Principles for Processing and Protecting Personal Data

### 1. Our commitment

This document reflects our commitment to (i) communicate transparently about the personal data we process and under what conditions; (ii) guarantee the security of personal data and the privacy of data subjects; (iii) provide appropriate mechanisms for exercising the rights of personal data subjects; and (iv) comply with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 - General Data Protection Regulation (GDPR) - and other applicable legislation, including national legislation that complements the GDPR (Law 58/2019 of 8 August).

### 2. Who we are

Interfundos is **responsible for processing** the personal data of the Participants or Shareholders (depending on the contractual or corporate nature of the Real Estate Alternative Investment Undertaking in question), Counterparties, Service Providers (actual and potential) and their respective Employees and who, in this context, decides which data is collected, the means of processing and the purposes for which the data is processed. Without prejudice to the above, the category, depth and purpose of the processing of personal data vary according to the category to which the data subject belongs and the purpose of the processing.

Contact information:

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Interfundos has a Data Protection Officer who (i) monitors data processing compliance with the applicable regulations, (ii) is one of its contacts for clarifying issues related to data processing, (iii) cooperates with the National Data Protection Committee (**NDPC**), in its capacity as a supervisory authority, and (iv) provides information and advises Interfundos on its obligations within the scope of privacy and data protection.

Contact information of the Data Protection Officer:

Interfundos

Data Protection Officer

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### 3. Which data we collect and process

Essentially, a personal data is any information that (regardless of its nature or support), directly or in combination with other data, may identify or be associated with a natural person.

The following table presents the main categories of personal data that we process regarding our Customers:

Personal data categories	Examples
Identification and contact information	Name, identification document number, tax identification number, photograph, signature, address, phone number or e-mail address.
Biographical data	Date of birth, gender, nationality, place of birth, marital status, family, schooling or information regarding professional activities.
Financial Data	Financial assets, liabilities in the financial industry, or monthly salary.

Products and Services	Account number:
Profiles	Investor profile and credit risk degree.
Contents	Information contained in written communications between the Customer and Interfundos.

Interfundos collects these personal data through the following means for collection (or production):

Means of collection	Examples
Data supplied by the subjects	Data or content provided directly by the subjects (i) in the process of subscribing to or acquiring products and services, (ii) in interactions with Banco Comercial Português branch network or contact centre and visits to our premises, (iii) in letters or e-mails sent.
Data collected by third-parties	Data obtained by Interfundos from third party entities with which it works, including lawyers and supervisory authorities.

## Obligation to provide personal data

In the context of establishing commercial and contractual relations, but also in the context of complying with legal and/or regulatory obligations relating, for example, to the anti-money laundering and anti-terrorist financing regime, it is compulsory to submit and collect certain personal data from Participants or Shareholders (depending on the contractual or corporate nature of the Real Estate Alternative Investment Undertaking in question), Counterparties, Service Providers and other subjects (e. g. guarantors, sureties, representatives, beneficial owners) necessary for the fulfilment of pre-contractual and contractual obligations and procedures, or those arising from the regulations in force. As a general rule, without this data, Interfundos will have to refuse to enter into business relationships, carry out occasional transactions, enter into contracts, or execute an order, or terminate a contract, having to terminate it.

## 4. How we process personal data

Data processing means any transaction or set of transactions performed on personal data manually or by automated means, including collection, storage, use, copy and transmission. At Interfundos, personal data are processed lawfully, fairly and in a transparent manner and for specific purposes. The following sections describe and illustrate the main purposes of data processing at Interfundos, within the corresponding legal bases:

### Performing an agreement

Interfundos processes data necessary for entering into, performing and managing agreements to which the data subject is party, or for pre-contractual measures at the data subject's request.

Processing purpose	Examples
Fund Management	Carrying out transactions on real estate assets, including leasing operations and organising the documents needed to sign a Purchase and Sale Promissory Agreement or even a deed.
Service provision contract	Documentary organisation for risk analysis when signing a service provision contract (e.g. contract

	work, security, site supervision, condominium management, etc.).
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## Compliance with legal or regulatory obligation

Interfundos processes the data necessary to ensure compliance with the various legal obligations - national and European - to which it is subject, including (i) the Asset Management Regime, (ii) CMVM Regulation 7/2023, (iii) the Commission's Delegated Regulation (EU) 231/2013, (iv) the Securities Code, (v) the Commercial Companies Code, (vi) legislation on preventing and combating money laundering and terrorist financing, (vii) tax legislation, (viii) provisions on the supervision of the activity of managing collective investment undertakings and (ix) legislation on the protection of personal data.

Processing purpose	Examples
Risk management	Verification of the identity and age, risk profile and investment objectives of a Participant or Counterparty.
Fraud prevention	Detection, analysis and response to potential fraud events.
Prevention of crimes related to money laundering and terrorism financing	Verification of lists of persons and entities subject to financial or trade sanctions, or identification and reporting of suspicious transactions.
Provision of information and answering requests from the Public Authorities	Provision of mandatory information (prudential and other) as and a reply to various requests made by the sector regulators (e.g. CMVM, IMPIC), public authorities (e.g. Courts, Polices, Tax Authority), external auditors, or under the The Foreign Account Tax Compliance Act, 2010 ("FATCA") or the Common Reporting Standard ("CRS").
Accounting and Financial Reporting	Accounting records, production and disclosure of the Interfundos's financial statements.
Management of document archive	Collection, categorisation and storage of physical documentation with personal data in the document archive, consisting of mandatory evidence within the context of the Interfundos's activity.
Contact and claims management	Reception, analysis and response to requests for information and complaints from Investors/Participants.

## Legitimate interest

Whenever Interfundos processes Data based on legitimate interests, it carries out a prior processing analysis, in order to ensure that the rights and interests of the data subjects are not overriding such legitimate interests.

Processing purpose	Legitimate interest	Examples
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Provision of information to Participants	Ensuring that data subjects are properly informed about the products/services they have subscribed to and/or intend to subscribe to. Convey to the subjects relevant information (related to such products and/or services).	Submission of various information materials in the context of the purchase or subscription of products or services by Investors/ Participants/Shareholders.
Development of Products and Services	Develop and improve products and/or services provided by Interfundos.	Collecting and analysing data for the development or adaptation of new Interfundos products and services, with the aim of better serving the specific needs of Participants.
Litigation management	Efficient management of cases and litigation in general.	Exercise of contractual or legal rights and defence in the event of judicial or extrajudicial disputes arising, in particular in situations of default or non-compliance with obligations of any nature of the data subject vis-à-vis Interfundos.
Collections	Recovery of defaulted Interfundos credits.	Activities for recovering loans in default.
Management control	Ensuring the sound and prudent management of Interfundos.	Production of control and management information of Interfundos.
Internal Audit	Assessing compliance with legal norms and internal regulations.	Collection and analysis of information within an internal audit on Interfundos's processes and operations.
Management and security of the information systems and premises.	Protect Interfundos' information systems, as well as people and property on Interfundos' premises.	Processes for the management and monitoring of the information systems and technological infrastructures, record of accesses and use of systems, processes of detection, analysis and response to potential information security incidents, control on identities and accesses to information systems, or control on the physical access to the premises.

## Consent of the data subject

Interfundos may make other types of data processing after getting the prior consent, expressed, in writing, verbally or through an explicit action, informed, free and for specific purposes of the data subject.

Interfundos only processes personal data with due grounds of lawfulness, and subject to prior information to the respective subjects. Eventual processing of additional secondary data shall only be made if (i) compatible with the purposes authorized and communicated to the subjects or (ii) are object of a specific and explicit consent from the data subject.

## 5. How long can personal data be stored and processed

Interfundos stores and processes personal data for the time necessary and while the legitimate purposes according to which the data are processed are in effect, for the compliance with contractual, legal and regulatory duties or for the protection of its legitimate interests and of third entities.

Reason for keeping records	Retention period
Compliance with a contract	Period while the contract is in effect. Interfundos may keep personal data for periods longer than the duration of the contractual relationship, to ensure rights or duties related to the contract, based on legitimate interests that justify it, namely the defence in legal proceedings or even based on the consent of the data subject.
Legal, tax or regulatory obligation	Legal limitation deadlines associated to legal, tax or regulatory duties or deadlines foreseen in special legislation (for example, 7 years after the end of the contractual relation foreseen within the scope of the law for the prevention of money laundering and terrorism financing), the longer one.

## 6. Which are your rights as a personal data subject

Interfundos ensures the exercise of the rights of the data subject in relation with the respective processing.

Right of the data subject	Description
Access	Without prejudice to the protection of the rights of third parties, data subjects have the right to have access to personal data concerning them, as well as to obtain information about the respective processing conditions.
Rectification	The data subjects are entitled to request the rectification of their personal data which are inaccurate or incomplete (e.g. address, e-mail address, phone numbers).
Opposition	Data subjects are entitled to oppose to data processing based on the legitimate interest of Interfundos.
Withdrawal of consent	Data subjects are entitled to withdraw the consent they gave for the processing of data based on that consent.
Erasure	Data subjects are entitled to obtain the erasure of their personal data held by Interfundos, provided that there are no valid reasons for its retention (e.g. compliance with a legal obligation, defence of Interfundos or of third parties in legal proceedings).
Limitation	Data subjects have the right to request the limitation of data processing when (i) they have contested the

	accuracy of the personal data and during a period allowing Interfundos to verify its accuracy, (ii) the processing is unlawful and they oppose the erasure of the personal data; (iii) Interfundos no longer needs the personal data, but such data is required by the customers for the purposes of the establishment, exercise or defence of a right in a legal proceeding; (iv) they oppose the processing and during the assessment period of the request by Interfundos.
Portability	Data subjects are entitled to receive the personal data they supplied to Interfundos, in a structured, commonly used, and with an automatic readable format, and the right to transmit this data to another responsible for data processing.
Not being subject to purely automated decisions	<p>Data subjects have the right to request human intervention or to challenge decisions based on fully automated processing of personal data that could have significant effects on their legal or privacy spheres, unless the processing is for the fulfilment of a legal obligation (e.g. prevention of money laundering).</p> <p>Interfundos has mechanisms to ensure the human intervention in data processing based on automated decisions enabling the data subject to express his/her point of view and object to the automated decision.</p>
Lodging a complaint with CNPD	Data subjects are entitled to lodge complaints with NDPC, in relation to issues connected with the exercise of their rights and the protection of their personal data.

You may exercise your rights in terms of data protection by sending a letter or e-mail to the contact details of Interfundos or the Data Protection Officer. Interfundos will reply to the requests within 1 days, with the exception of particularly complex requests. In these cases, Interfundos will inform the subjects (i) of the need to extend the period for reply, for a maximum additional period of 2 days, (ii) of the corresponding justification.

Whenever Interfundos deems that it is not possible to respond to the requests, the subjects shall be informed of the reasons, within the deadlines set forth above.

The exercise of the rights is free of charge, except when situations deemed excessive, irregular and /or bad faith. In these situations, Interfundos will previously inform the data subjects of the fees that will be charged and respective justification.

Interfundos has the appropriate mechanisms to verify and confirm the identity of the data subjects that wish to exercise the rights, being accepted only those made by persons whose identity can be confirmed and through a channel that allows the Bank to keep evidence of the request and of the respective answer.

## 7. Sharing personal data

Interfundos Employees who need access to personal data to perform their functions, namely in the scope of contractual, pre-contractual and legal diligences or obligations, have access to it.

In addition, personal data may be provided to third-parties - entities which are of Interfundos:

Third-parties	Examples
Other entities in Banco Comercial Português Group	Banco Comercial Português, S.A. or joint ventures constituted by the Banco Comercial Português Group (BCP Group), within the scope of measures to prevent money laundering, terrorist financing and fraud, or for administrative and financial management purposes at Group level.
Government entities and supervision authorities	The <i>Comissão do Mercado de Valores Mobiliários</i> (Portuguese stock market regulator), the Financial Intelligence Unit of the Judicial Police ( <i>PJ</i> ) and tax authorities, whenever there is a legal or regulatory obligation to do so, for example the communication of information (i) under the terms of the applicable legislation, (ii) in the course of an investigation, whistleblowing report or procedure, to Public Bodies, to the Court and to the Security Forces that are responsible for the matter, or (iii) to authorities or official bodies of other countries, located inside or outside the European Union, within the scope of the fight against the financing of terrorism, serious forms of organised crime and the prevention of money laundering.
Other Management Entity of Collective Investment Undertakings	Whenever the management of a Real Estate Investment Undertaking is transferred to another Management Entity, all elements relating to the Fund and its day-to-day management must be handed over to the Management Entity receiving the Fund.
Service providers	Document and archive management service providers, technology services, law firms, property appraisers.

## Transfers of personal data to third countries or international organisations

The transmission of data to countries outside the European Union only occurs (i) by legal requirement, or (ii) with the express authorisation of the data subjects.

In the event that it is necessary to use service providers from third countries, Interfundos will contractually ensure that these entities comply with all legal obligations in terms of data protection and will process the data in accordance with the prior and documented instructions given by Interfundos.

## 8. Find out how we protect your data

Protecting the confidentiality and integrity of data has long been considered by Interfundos, and by the BCP Group of which it is a part, to be one of the fundamental pillars in building relationships of trust with Shareholders, Participants, Counterparties, Service Providers, Employees, Regulatory and Supervisory Entities.

Interfundos and BCP Group also implemented organizational measures, security processes and systems that are appropriate to protect personal data in its care from destruction, alteration and unauthorized access, including: (i) mechanisms to control access to information systems and data; (ii) specialised security systems (e.g. firewalls, antivirus, intrusion detection systems); (iii) mechanisms to record actions of employees and other users of information systems (e.g. access, alteration, deletion of personal data); (iv) mechanisms for data encryption and pseudonymisation and anonymisation of data; (v) encryption measures applicable to mobile devices; (vi) physical security measures to protect the premises (e.g. physical access control, surveillance, various alarms); (vii) a programme to train and raise awareness of the employees of ActivoBank regarding information security and personal data protection.

## **9. Changes to the privacy policy**

Interfundos reserves the right to, at all times, alter this document to update it and adjust it to the best market practices or to future legal and regulatory amendments.

The updated version will always be available for consultation at [www.interfundos.pt](http://www.interfundos.pt).

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