

## 1. Your data controller

This Privacy Notice relates solely to information supplied by you to us via our websites. Threadneedle Asset Management Holdings Limited registered in England and Wales under company number 03554212 and whose registered office is at Cannon Place, 78 Cannon Street, London EC4N 6AG ("Threadneedle"). Any reference to Threadneedle shall also include reference to or any of the Threadneedle group of companies including its holding companies, subsidiaries and affiliates. The data controller in respect of any Personal Data provided is Threadneedle Asset Management Holdings Limited and other Controllers identified in section 14. In this privacy statement "we", "us" and "our" means Threadneedle and is addressed to individuals outside our organisation with whom we interact, including visitors to our websites (our "Sites"), customers, Personnel of corporate customers, investors and vendors, and other recipients of our services (together, "you"). Defined terms used in this Policy are explained in Section 14. We shall respect the privacy of your Personal Data, treat it as confidential and keep it secure, subject to the provision of applicable laws. below.

## 2. Processing your Personal Data

This Privacy Policy covers the information about you ("Personal Data") that Personal Data you supply to us through this website or otherwise any other additional Personal Data that you provide to us.

Collection of Personal Data: We collect Personal Data about you, subject to applicable law, from a variety of sources as follows:

- We obtain your Personal Data when you provide it to us (e.g., where you contact us via email or telephone, or by any other means).
- We collect your Personal Data in the ordinary course of our relationship with you (e.g., in the course of managing your transactions or your investment in our funds).
- We collect Personal Data that you manifestly choose to make public, including via social media (e.g., we may collect information from your social media profile(s), to the extent that you choose to make your profile publicly visible).
- We receive your Personal Data from third parties who provide it to us (e.g., your employer; our customers; credit reference agencies; law enforcement authorities; etc.).
- We receive your Personal Data from third parties, where you purchase any of our products or services through such third parties.
- We collect or obtain Personal Data when you visit any of our Sites or use any features or resources available on or through a Site. When you visit a Site, your device and browser may automatically disclose certain information (such as device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connecting to a Site and other technical communications information), some of which may constitute Personal Data.

Creation of Personal Data: We may also create Personal Data about you, such as records of your interactions with us, and details of your accounts, subject to applicable law.

Relevant Personal and Special Category Data: The categories of Personal Data about you that we may Process, subject to applicable law, are as follows:

- Personal details: given name(s); preferred name; nickname(s), gender; date of birth / age; marital status; Social Security Number; Passport number(s); other Government(s) issued numbers (tax identification number, Green Card(s) number(s) including Driving Licence number); nationality; lifestyle and social circumstances; images of Passports; images of Driving Licences; images of Gun Licence(s); images of signatures; authentication data (passwords, mother maiden name, challenge/response questions and answers, PINs, face recognition, voice recognition) and photograph, visual images, personal appearance and behaviour.
- Family details: names and contact details of family members and dependents.
- Contact details: address; telephone number; fax number; email address; and social media profile details.
- Employment details: industry; role; business activities; names of current and former employers; work address; work telephone number; work fax number; work email address; and work-related social media profile details.
- Education history: details of your education and qualifications.
- Financial details: billing address; bank account numbers; credit card numbers; cardholder or account holder name and details; instruction records; transaction details; and counterparty details.
- Views and opinions: any views and opinions that you choose to send to us, or publish about us on (including on social media platforms).
- Electronic Identifying Data: IP address cookies, logs, online identifiers, device IDs, geolocation.

Processing your Special Category Data: We do not seek to collect or otherwise Process your Special Category Data, except where:

- The Processing is necessary for compliance with a legal obligation (e.g., to comply with our diversity reporting obligations);
- The Processing is necessary for the detection or prevention of crime (including the prevention of fraud) to the extent permitted by applicable law;
- You have manifestly made your Special Category Data public;
- The Processing is necessary to protect the vital interests of any individual; or
- We have, in accordance with applicable law, obtained your prior explicit consent prior to Processing your Special Category Data (as above, this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way); or
- Processing is necessary for reasons of substantial public interest and occurs on the basis of an applicable law that is proportionate to the aim pursued and provides for suitable and specific measures to safeguard your fundamental rights and interests.

We only Process Criminal Offences Data, and national identification numbers, to the extent required or permitted by applicable law.

Purposes for which we may Process your Personal Data, and legal bases for Processing: The purposes for which we may Process Personal Data, subject to applicable law, and the legal bases on which we may perform such Processing, are:

## Processing activity

## Legal basis for Processing

***AML/KYC:*** fulfilling our regulatory compliance obligations, including 'Know Your Client' checks; and confirming and verifying your identity (including by using credit reference agencies); and screening against government, supranational bodies (including but not limited to the European Union and the United Nations Security Council) and/or law enforcement agency sanctions lists as well as internal sanctions lists and other legal restrictions.

- The Processing is necessary for compliance with a legal obligation; or
- The Processing is necessary in connection with any contract that you may enter into with us, or to take steps prior to entering into a contract with us; or
- We have a legitimate interest in carrying out the Processing for the purpose of protecting against fraud (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

***Client on-boarding:*** request for proposals (RFPs), on-boarding new clients; and compliance with our internal compliance requirements, policies and procedures.

- The Processing is necessary in connection with any contract that you may enter into with us, or to take steps prior to entering into a contract with us; or
- We have a legitimate interest in carrying out the Processing for the purpose of on-boarding new clients (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

***Credit worthiness:*** conducting credit reference checks and other financial due diligence

- We have a legitimate interest in carrying out the Processing for the purpose of conducting financial due diligence (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

***Provision of products and services to you:*** administering relationships and related services; performance of tasks necessary

- The Processing is necessary in connection with any contract that you may enter into with us, or to take steps prior to entering into a contract with us; or

for the provision of the requested services; communicating with you in relation to those services.

- We have a legitimate interest in carrying out the Processing for the purpose of providing services to you (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

***Marketing / Prospecting.*** communicating with you via any means (including via email, telephone, text message, social media, post or in person) subject to ensuring that such communications are provided to you in compliance with applicable law; and maintaining and updating your contact information where appropriate.

- We have a legitimate interest in carrying out the Processing for the purpose of conducting marketing and prospecting (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

***Operation of our Sites.*** operation and management of our Sites; providing content to you; displaying advertising and other information to you; and communicating and interacting with you via our Sites.

- The Processing is necessary in connection with any contract that you may enter into with us, or to take steps prior to entering into a contract with us; or
- We have a legitimate interest in carrying out the Processing for the purpose of providing services to you (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

***IT operations.*** management of our communications systems; operation of IT security; and IT security audits.

- The Processing is necessary for compliance with a legal obligation; or
- We have a legitimate interest in carrying out the Processing for the purpose of managing and operating our IT systems and ensuring the security of those systems (to the extent that such legitimate interest is not

overridden by your interests, fundamental rights, or freedoms).

***Health and safety:*** health and safety assessments and record keeping; and compliance with related legal obligations.

- The Processing is necessary for compliance with a legal obligation; or
- We have a legitimate interest in carrying out the Processing for the purpose of providing a safe and secure environment at our premises (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- The Processing is necessary to protect the vital interests of any individual.

***Financial management:*** sales; finance; corporate audit; and vendor management.

- We have a legitimate interest in carrying out the Processing for the purpose of providing a safe and secure environment at our premises (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

***Research:*** conducting market or customer satisfaction research; and engaging with you for the purposes of obtaining your views on our products and services.

- We have a legitimate interest in carrying out the Processing for the purpose of providing a safe and secure environment at our premises (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

***Security:*** physical security of our premises (including records of visits to our premises and CCTV recordings); and electronic security (including login records and access details, where you access our electronic systems).

- The Processing is necessary for compliance with a legal obligation; or
- We have a legitimate interest in carrying out the Processing for the purpose of ensuring the physical and electronic security of our business and our premises (to

the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

***Investigations:*** detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law.

- The Processing is necessary for compliance with a legal obligation; or
- We have a legitimate interest in carrying out the Processing for the purpose of detecting, and protecting against, breaches of our policies and applicable laws (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

***Legal compliance:*** compliance with our legal and regulatory obligations under applicable law.

- The Processing is necessary for compliance with a legal obligation.

***Legal proceedings:*** establishing, exercising and defending legal rights.

- The Processing is necessary for compliance with a legal obligation; or
- We have a legitimate interest in carrying out the Processing for the purpose of establishing, exercising or defending our legal rights (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

***Improving our products and services:*** identifying issues with existing products and services; planning improvements to existing products and services; and creating new products and services.

- We have a legitimate interest in carrying out the Processing for the purpose of improving our products or services (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or
- We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

***Risk Management:*** Audit, compliance, controls and other risk management.

- The Processing is necessary for compliance with a legal obligation; or
- We have a legitimate interest in carrying out the Processing for the purpose of managing the levels of risk to which our business is exposed (to the extent that

such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

***Fraud prevention: Detecting, preventing and investigating fraud.***

- The Processing is necessary for compliance with a legal obligation; or
- We have a legitimate interest in carrying out the Processing for the purpose of detecting, and protecting against, fraud (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

### **3. Sharing of your Personal Data**

We may use external third parties such as those described below to process your Personal Data on our behalf in accordance with these purposes.

If applicable, where you have notified us of your adviser, the Personal Data provided may be shared with such adviser. You must notify us in writing if you no longer wish us to share your Personal Data with your adviser or of any change to your adviser. Your adviser should have its own arrangements with you about its use of your Personal Data. The Personal Data provided may also be shared with other organisations in order for us to comply with any legal or regulatory requirements (e.g., audit reporting and anti-money laundering checks). In addition, we may share your Personal Data with the companies within the Threadneedle group for the purposes set out in this privacy statement.

Additionally Threadneedle may communicate your Personal Data to such authorised individuals and entities as are listed below, including but not limited to those parties for which you subsequently give us permission, or is under either a legal obligation or any other duty to do so. For the purposes detailed above, your information may be disclosed to:

1. any other branches or companies within our group of companies;
2. any regulatory, supervisory, governmental or quasi-governmental authority with authority and jurisdiction over us;
3. any agent, contractor or third party service provider, professional adviser or any other person under a duty of confidentiality to Columbia Threadneedle Investments;
4. any credit reference agency and, in the event of default, any debt collection agency;
5. any actual or potential participant or sub-participant in, assignee, novatee or transferee of, our rights and/or obligations in relation to you; and,
6. any financial institution with which we have or propose to have dealings

See also under 'Overseas transfers' below.

### **4. Business changes**

If we or the Threadneedle group undergoes a group reorganisation or is sold to a third party, the Personal Data provided to us may be transferred to that reorganised entity or third party and used for the purposes highlighted above.

## **5. Overseas transfers**

We may transfer your Personal Data to countries located outside of the European Economic Area (the EEA), including to the United States and India. This may happen when our servers, suppliers and/or, service providers are based outside of the EEA. We may transfer your information under certain circumstances (e.g., where it is necessary to perform our contract with you). The data protection laws and other laws of these countries may not be as comprehensive as those that apply within the EEA - in these instances we will take steps to ensure that your privacy and confidentiality rights are respected.

Where we transfer your Personal Data to other countries, we do so on the basis of:

- European Commission's adequacy decisions;
- suitable Standard Contractual Clauses; or
- other valid transfer mechanisms.

If you want to receive more information about the safeguards applied to international transfers of personal data, please use the contact details provided in the "Contact Information" section below.

## **6. Your rights**

With limited exceptions, you are entitled, in accordance with applicable law, to object to or request restriction of processing of your Personal Data, and to request access to, rectification, erasure and portability of your Personal Data. This service is provided free of charge unless requests are manifestly unfounded or excessive. In these circumstances, we reserve the right to charge a reasonable fee or, refuse to act on the request. You can write to us at Threadneedle Investment Services Limited, PO Box 10033, Chelmsford, Essex CM99 2AL or alternatively see Contact Information in section 13 below.

If any of the information that we hold about you is wrong, please tell us and we will put it right.

Subject to any applicable local laws and regulations, if you prefer not to be kept informed of our products and services, please let us know.

You may lodge a complaint with a Data Protection Authority if you consider our processing of your Personal Data may infringe applicable law.

## **7. Third Party Information**

If you provide us with information about another person, you confirm you already have explicit confirmation that such other person has appointed you to act for them to consent to the processing of their Personal Data by us. This means that you have informed them of our identity and the purpose for which their Personal Data will be processed, namely to verify their name and address and otherwise only in connection with you. You agree to keep us, and any Threadneedle group company or relevant third party fully indemnified for your not having complied with this paragraph.

## **8. Data Security**



We maintain reasonable security measures to safeguard Personal Data from loss, interference, misuse, unauthorised access, disclosure, alteration or destruction. You are responsible for ensuring that any Personal Data that you send to us are sent securely.

We also maintain reasonable procedures to help ensure that such data is reliable for its intended use and is accurate, complete and current.

## **9. Data Accuracy**

We take reasonable steps designed to ensure that:

- your Personal Data that we Process are accurate and, where necessary, kept up to date; and
- any of your Personal Data that we Process that are inaccurate (having regard to the purposes for which they are Processed) are erased or rectified without delay. From time to time we may ask you to confirm the accuracy of your Personal Data.

## **10. Data Minimisation**

We take reasonable steps designed to ensure that your Personal Data that we Process are limited to the Personal Data reasonably required in connection with the purposes set out in this Notice.

## **11. Data Retention**

We take every reasonable step to ensure that your Personal Data are only Processed for the minimum period necessary for the purposes set out in this Notice. The criteria for determining the duration for which we will retain your Personal Data are as follows:

(1) we will retain copies of your Personal Data in a form that permits identification only for as long as:

a. we maintain an ongoing relationship with you (e.g., where you are a recipient of our services, or you are lawfully included in our mailing list and have not unsubscribed); or

b. your Personal Data are necessary in connection with the lawful purposes set out in this Notice, for which we have a valid legal basis (e.g., where your personal data are included in a contract between us and your employer, and we have a legitimate interest in processing those data for the purposes of operating our business and fulfilling our obligations under that contract; or where we have a legal obligation to retain your Personal Data),

plus:

(2) the duration of:

a. any applicable limitation period under applicable law (i.e., any period during which any person could bring a legal claim against us in connection with your Personal Data, or to which your Personal Data may be relevant); and

b. an additional twelve (12) month period following the end of such applicable limitation period (so that, if a person bring a claim at the end of the limitation period, we are still afforded a reasonable amount of time in which to identify any Personal Data that are relevant to that claim),

and:

(3) in addition, if any relevant legal claims are brought, we may continue to Process your Personal Data for such additional periods as are necessary in connection with that claim.

During the periods noted in paragraphs (2)a and (2)b above, we will restrict our Processing of your Personal Data to storage of, and maintaining the security of, those data, except to the extent that those data need to be reviewed in connection with any legal claim, or any obligation under applicable law.

Once the periods in paragraphs (1), (2) and (3) above, each to the extent applicable, have concluded, we will either:

- permanently delete or destroy the relevant Personal Data;
- archive your Personal Data so that it is beyond use; or
- anonymize the relevant Personal Data.

## **12. Cookies**

A "cookie" is a small piece of encoded information sent by a web server to be stored on your web browser (Internet Explorer, Chrome, Firefox, Safari, etc.) so that it can remember something about you such as username, password, references at a later date. Cookies have three functions: security, log in and responsibility discharge.

A cookie also ensures that there is a unique identification when you visit the ColumbiaThreadneedle.com website and helps us to determine what page you may see next time you visit the website. This process enables us to provide you with personalised information and simplify your user experience.

We use persistent cookies that do not expire at the end of a user session. The cookie stored on your web browser does not contain any Personal Data and is encrypted and only our web server can read it.

Specifically cookies may:

1. allow us to recognise the PC you are using when you return to our website so that we can understand your interest in our website and tailor website content and advertisements to match your interests;
2. identify you after you have logged in by storing a temporary reference number in the cookie so that our web server can conduct a dialogue with you while simultaneously dealing with other customers. (Your browser keeps this type of cookie until you log off or close down your browser when these types of cookie are normally deleted. No other information is stored in this type of cookie);
3. allow you to carry information across pages of our website and avoid having to re-enter that information;
4. allow you access to stored information if you register for any of our on-line services;
5. enable us to produce statistical information (anonymous) which helps us to improve the structure and content of our website; and/or,
6. enable us to evaluate the effectiveness of our advertising and promotions.

To learn more about cookies and how to manage them, visit [aboutcookies.org](http://aboutcookies.org).

### **Our use of cookies**

On our website we use cookies to improve our service and to help manage your visit. The list below shows all of the cookies that are set by this website and third-party services we use.

## Cookies for improving service

Google Analytics sets cookies to help us accurately estimate the number of visitors to the website, what pages you visit, how long you are on the site, how you got here and what you click on. We use this to improve the user experience. We do not collect or store your Personal Data (e.g. your name or address) so this information cannot be used to identify who you are.

The following cookies are set by Google Analytics:

Name	Typical Content and Description	Expires
_utma	Randomly generated number This cookie keeps track of the number of times a visitor has been to the site, when their first visit was, and when their last visit occurred.	2 years
_utmb	Randomly generated number This cookie takes a timestamp of the exact moment in time when a visitor enters a site.	30 minutes
_utmc	Randomly generated number This cookie takes a timestamp of the exact moment in time when a visitor leaves a site.	When you close your browser
_utmz	Randomly generated number and information on how the site was reached (e.g. direct or via a link, organic search or paid search). This cookie keeps track of where the visitor came from, what search engine you used, what link you clicked on, what keyword you used, and where they were in the world when you accessed our website.	6 months
_utmt	Used to throttle request rate	10 minutes
_utmv	Used to store visitor-level custom variable data.	2 years
_dc_gtm_UA-608432-13	Google Tag Manager: used to manage all scripts on the website	10 minutes

The information generated by the cookie about the use of the website will normally be stored on a Google server in the United States. However, if you are located within the EU or the European Economic Area, your IP address will be shortened by Google beforehand. In exceptional cases only, your full address will be transmitted to a Google server in the United States and shortened there. On our behalf, Google will use this information for the purpose of compiling reports on website activity and providing other services relating to website activity and internet usage. The IP address transmitted from your browser as part of Google Analytics will not be associated with any other

data held by Google. You may prevent web usage data (including your IP address) generated by the cookie from being transmitted to Google and processed there if you download and install this [Browser-Plugin](#).

### Cookies for managing your visit

We use a number of cookies to remember your selections and preferences that you've made when looking at the information on this site. These cookies inform us whether you're a returning visitor, whether you have accepted our disclaimer and website terms and conditions, what investor type you are and what's your language preference.

The following cookies are set by us:

Name	Typical Content	Expires
sessionId	Randomly generated letters and numbers	When you close your browser
sessionlastupdated	Randomly generated number	When you close your browser
__RequestVerificationToken_Lw__	Randomly generated letters and numbers	When you close your browser
.ASPXAUTH	Used to determining if a user is authenticated	When you close your browser
AWSELB	Randomly generated letters and numbers	When you close your browser
RPM_vref	Randomly generated letters and numbers	When you close your browser
RPM_vrref	Randomly generated letters and numbers	When you close your browser
culture	Dependant on your language preference: en-GB, fr-FR, de-DE, it-IT, es-ES, NL-nl or pt-PT	1 year
Global-disclaimer	Accepted	1 year
private-disclaimer	Accepted	1 year
Intermediary-disclaimer	Accepted	1 year

<b>Name</b>	<b>Typical Content</b>	<b>Expires</b>
Institutional-disclaimer	Accepted	1 year
Distribution partner-disclaimer	Accepted	1 year
Investor type	Dependant on your investor type preference: private, intermediary, institutional or distribution partner	1 year

### Turning off Cookies

If you do not wish to have a cookie stored on your computer, you should disable them in your browsers security options using your browsers anonymous usage setting (called "Incognito" in Chrome, "InPrivate" for Internet Explorer, "Private Browsing" in Firefox and Safari etc.). If you do this we will not place cookies on your computer. Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our site and the site will not work as well as if you had permitted our use of cookies.

### 13. Contact Information

You can raise any issues regarding the processing of your Personal Data by contacting our Data Protection Officer at any time:

DPO@columbiathreadneedle.com

*Cannon Place, 78 Cannon Street, London EC4N 6AG*

### 14. Controllers

Threadneedle Asset Management Holdings Ltd	Cannon Place, 78 Cannon Street, London EC4N 6AG
Threadneedle Asset Management Limited	Cannon Place, 78 Cannon Street, London EC4N 6AG
Threadneedle International Limited	Cannon Place, 78 Cannon Street, London EC4N 6AG
Threadneedle Investment Services Ltd	Cannon Place, 78 Cannon Street, London EC4N 6AG
Threadneedle Management Services Limited	Cannon Place, 78 Cannon Street, London EC4N 6AG
Threadneedle Pension Trustees Limited	Cannon Place, 78 Cannon Street, London EC4N 6AG
Threadneedle Pensions Limited	Cannon Place, 78 Cannon Street, London EC4N 6AG
Threadneedle Portfolio Services Limited	Cannon Place, 78 Cannon Street, London EC4N 6AG
Threadneedle Property Investments Ltd	Cannon Place, 78 Cannon Street, London EC4N 6AG
Threadneedle Unit Trust Manager Limited	Cannon Place, 78 Cannon Street, London EC4N 6AG
Threadneedle Management Luxembourg SA	44, rue de la Vallée L-2661 Luxembourg Grand Duchy of Luxembourg
Columbia Threadneedle SICAV SIF	44, rue de la Vallée L-2661 Luxembourg Grand Duchy of Luxembourg

Threadneedle Property Unit Trust Luxembourg Feeder SA SICAV SI	44, rue de la Vallée L-2661 Luxembourg Grand Duchy of Luxembourg
Threadneedle International Investments GmbH	Claridenstrasse 41, 8002 Zürich Switzerland
Threadneedle (Lux)	44, rue de la Vallée L-2661 Luxembourg Grand Duchy of Luxembourg
Columbia Threadneedle Investments (ME) Limited	Gate Village 5, Level 2, Dubai International Financial Centre, P.O.Box 482005 Dubai, United Arab Emirates

## 15. Defined Terms

<b>Controller</b>	The entity that decides how and why Personal Data is Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.
<b>Data Protection Authority</b>	An independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.
<b>Personal Data</b>	Information that is about any individual, or from which any individual is identifiable <sup>1</sup> .
<b>Process or Processed or Processing</b>	Anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
<b>Personnel</b>	Any current, former and prospective directors, officers, consultants, employees, temporary staff, individual contractors, interns, secondees and other personnel.
<b>Processor</b>	Any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).

**Special Category Data**      Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, or any other information that may be deemed to be sensitive under applicable law.

**Criminal Offences Data**      Personal data about any actual or alleged criminal offences or penalties.

*<sup>1</sup> It should be noted that the concept of personal data in the data protection laws of Austria and Switzerland includes information about corporate bodies as well as individuals.*