

**Data Privacy Notice:**  
**Allianz Global Investors' Group Client Reporting Tool**  
**"AirPortal"**

We would like to inform you about the processing of your Personal Data (i.e., data which can be linked/attributed to you as an individual person) in connection with the use of "AirPortal" (hereinafter: "Client Reporting Tool" or "AirPortal").

**Purpose of processing**

We use "AirPortal" to grant you access to your client reports/your company's client reports or to allow you performing your related duties as Allianz Global Investors employee. AirPortal is a platform serviced by SimCorp GmbH, Germany.

**Data Controller**

Allianz Global Investors GmbH ("AllianzGI", "we", "us" or "our") is the Data Controller responsible for data processing that is directly related to the use of the Client Reporting Tool. This means it is the entity deciding why and how to collect and process your Personal Data.

In addition, other companies of AllianzGI Group may become responsible for the processing of your Personal Data (for example in cases where your investment is with another AllianzGI company that is not Allianz Global Investors GmbH). A list of all AllianzGI entities with respective contact details is available under <https://www.allianzgi.com/en/our-firm/our-offices>.

To the extent two or more AllianzGI Group entities process your Personal Data in a joint manner, we kindly ask you to address any queries you may have to the Data Protection Officer whose details are set out at the end of this Data Privacy Notice. The Data Protection Officer will then forward your query to the AllianzGI entity who is primarily responsible, if necessary.

### **Data subjects and data categories**

#### **Information you give to us.**

- Registration: In order to allow you to register on the AirPortal, you (or the company you are representing) must provide us with your name, first name, business email address, and the name and postal address of the company you are presenting (Street, City, State/ Province, Zip/ Postal Code, Country). We also may document the local salutation. Furthermore, a password is required to entering the AirPortal. We may request other information from you but only in case needed.
- Interacting with us: You may give us information about you by corresponding with us by e-mail or otherwise, for example where you contact our Business Developer or Client Account Manager.

Please note that you can decide in AirPortal itself if you would like to receive automatic email-notifications from the AirPortal in case new content is being uploaded by us. You can unsubscribe at any time.

#### **Information we collect about you.**

With regard to each of your visits to the AirPortal we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including date and time; page response times, download errors, length of visits, and methods used to browse away from the AirPortal.

### **Scope of processing**

#### **Information you give to us.**

We may use this information:

- to carry out our obligations arising from any contracts entered into between the company you are representing and us and to provide you with the information, products and services that your company requests from us;
- to notify you about changes or new uploads to the AirPortal;
- to ensure that content from the AirPortal is presented in the most effective manner for you and for your computer or device;
- to monitor the use of the AirPortal from time to time to eliminate infringing, defamatory, immoral, illegal, abusive and/or inappropriate use.

### Information we collect about you.

We will use this information:

- to improve the AirPortal to ensure that content is presented in the most effective manner for you and for your computer or device;
- as part of our efforts to keep the Client Reporting Tool safe and secure;

Automated decision-making within the meaning of Article 22 of the EU General Data Protection Regulation (GDPR) is not used.

### Cookies:

We use cookies to make the AirPortal run smoothly and optimally for our users and to continuously improve its operation. Cookies are small text files that contain a sequence of alphanumeric characters, which are stored on your device. We use session cookies when you log into AirPortal. A session cookie is deleted when you close your internet browser. Your internet browser may well offer settings for cookies. Please note that you may not be able to make full use of the features in the services offered on our website if you either delete cookies or choose not to allow them.

We use the following cookies:

**Strictly necessary cookies.** These are cookies that are required for the operation of our website/the AirPortal.

Name	Domain	Expiration	Purpose
x-ms-cpim-admin	main.b2cadmin.ext.azure.com	End of browser session	Holds user membership data across tenants. The tenants a user is a member of and level of membership (Admin or User).
x-ms-cpim-slice	b2clogin.com, login.microsoftonline.com, branded domain	End of browser session	Used to route requests to the appropriate production instance.
x-ms-cpim-trans	b2clogin.com, login.microsoftonline.com, branded domain	End of browser session	Used for tracking the transactions (number of authentication requests to Azure AD B2C) and the current transaction.
x-ms-cpim-ss0:{id}	b2clogin.com, login.microsoftonline.com, branded domain	End of browser session	Used for maintaining the SSO session. This cookie is set as persistent, when Keep Me Signed In is enabled.
x-ms-cpim-cache:{id}_n	b2clogin.com, login.microsoftonline.com, branded domain	End of browser session, successful authentication	Used for maintaining the request state.

x-ms-cpim-csrf	b2clogin.com, login.microsoftonline.com, branded domain	End of browser session	Cross-Site Request Forgery token used for CSRF protection. For more information, read the Cross-Site request forgery token section.
x-ms-cpim-dc	b2clogin.com, login.microsoftonline.com, branded domain	End of browser session	Used for Azure AD B2C network routing.
x-ms-cpim-ctx	b2clogin.com, login.microsoftonline.com, branded domain	End of browser session	Context
x-ms-cpim-rp	b2clogin.com, login.microsoftonline.com, branded domain	End of browser session	Used for storing membership data for the resource provider tenant.
x-ms-cpim-rc	b2clogin.com, login.microsoftonline.com, branded domain	End of browser session	Used for storing the relay cookie.
x-ms-cpim-geo	b2clogin.com, login.microsoftonline.com, branded domain	1 Hour	Used as a hint to determine the resource tenants home geographic location.
ai_user	b2clogin.com, login.microsoftonline.com, branded domain	1 Year	Application Insights website performance monitoring

### **Legal bases for data processing**

You instruct us to process your personal data in accordance with this Data Privacy Notice on the following basis:

- processing is necessary for the performance of a contract, being our agreement with your company to provide the AirPortal/Client Reports to you (for our employees we rely on our employment contract); or
- where the processing is not necessary for the above reasons on the basis of our legitimate interests (and we have assessed that these interests do not override your rights and freedoms).

The legitimate interests are as follow:

- activities associated with the running of our business such as finance and administration and information security and back-up procedures;
- to prove we fulfilled our legal and contractual obligations;
- improving and developing our services

To the extent this is required by applicable data privacy laws and regulations, we shall process your personal data on the basis of your consent.

### **Recipients / transfer of data**

For the purposes of providing services to Allianz Global Investors, and for the other purposes set out above, Allianz Global Investors may share your information with affiliates and representatives of Allianz Global Investors, and third parties such as IT service providers (such as SimCorp GmbH).

Our affiliates (see <https://www.allianzgi.com/en/our-firm/our-offices>), representatives and third parties who have access to the personal data collected and processed are obliged to observe data protection regulations.

Your personal data may be transferred to recipients in countries outside the European Union, the European Economic Area or the United Kingdom, which may have a lower level of data protection. Unless the EU Commission or the UK Government have established an adequate level of data protection for such a recipient country, we ensure that the recipients of your personal data comply with such an appropriate level, in particular, by implementing contractual safeguards such as standard contractual clauses for data transfers which are approved by the European Commission (see [https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en)) and the UK Government (see <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/international-data-transfer-agreement-and-guidance/>).

Whenever we transfer your Personal Data within the Allianz Group to an OE outside of the EU / EEA, we will do so based on Allianz' approved binding corporate rules ("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 may also share your information with government agencies and institutions, regulators, etc. in accordance with the applicable laws, regulations, a court order, or an official request, or in accordance with and for the purposes of official (regulatory) policies or similar procedures as required or permitted by applicable law.

Please check the Client Representative Privacy Notice on the Internet

(<https://www.allianzgi.com/en/privacy-principles/client-representative-privacy-notice#clientrepresentatives>) or the Employee Privacy Notice in the Intranet.

### **Security of data processing**

Allianz Global Investors has implemented appropriate technical and organisational security measures to protect your personal data that Allianz Global Investors has collected from unauthorised access, misuse, loss and destruction.

### **Data Protection Officer**

We have appointed a Data Protection Officer (DPO). You can reach out to our DPO as follows:

**Allianz Global Investors GmbH**

**Data Protection Officer**

**Bockenheimer Landstrasse 42-44**

**60323 Frankfurt**

**Germany**

**Email: [dataprivacy@allianzgi.com](mailto:dataprivacy@allianzgi.com)**

### **Your rights as a data subject**

Where permitted by law, you have the right to:

- Request information about your personal data, including information such as the source and categories of data, reasons for processing, recipients (or categories of recipients) and the retention period;
- Update or correct your personal data so that it is always correct;
- Have your personal data supplied in an electronic format, to you or to a third party specified by you;

- Request that your personal data be deleted from our systems, once it is no longer required for the above-mentioned purposes;
- Restrict the processing of your personal data under certain circumstances, e.g. if you dispute the accuracy of your personal data, until we have verified its accuracy;
- Object to the processing of your personal data for specific reasons relating to your particular situation which take priority over our legitimate reasons for processing the data; and
- Withdraw your consent (if we asked you for consent) at any time, if your personal data is being processed with your consent, without this affecting the lawfulness of the processing that took place before your consent was withdrawn;
- File a complaint with us or the relevant data protection authority.

You may object to the use of your personal data for the purposes of marketing and market research or opinion polling.

#### **Deletion of data**

As a general rule, we delete personal data in the context of the use of the AirPortal if there is no need for further storage. A requirement may exist to retain data, in particular, if the data is still required in order to fulfil contractual obligations, to be able to check and grant or defend warranty claims and, if applicable, guarantee claims. In the case of statutory retention obligations, deletion is only possible after expiry of the respective retention obligation.

#### **Updates to this Data Privacy Notice:**

We may update this Data Privacy Notice from time to time. We will notify you of any significant changes to this Data Privacy Notice in the AirPortal, on the relevant websites or through other appropriate communication channels. All changes shall be effective from the date indicated on the updated Data Privacy Notice, unless otherwise provided in the notification.

Status: March 2024