

GENERAL CLIENT INFORMATION

Conflict of Interest Policy

Best Execution Policy

Data Protection Policy

Version: December 2022

© BPM – Berlin Portfolio Management GmbH 2022



CLIENT INFORMATION ABOUT THE INVESTMENT FIRM AND ITS INVESTMENT SERVICES (ART 5 (2) OF THE GERMAN REGULATION ON THE RULES OF CONDUCT AND ORGANISATIONAL REQUIREMENTS FOR INVESTMENT FIRMS (WPDVEROV))

Contents

	Page
1 Discretionary financial asset management	03
2 Investment philosophy	03
3 Name and address of the investment firm	04
4 Communicating with BPM – Berlin Portfolio Management GmbH	04
5 Nature, frequency and timing of reports on the services provided	04
6 Name and address of the competent authority	05
7 Measures to protect financial instruments or client funds held by BPM	05
8 Conflicts of interest policy	05
9 Best execution policy	06
10 Valuation of financial instruments	07
11 Costs	07
12 Authorisation to provide securities services	08
13 Contacts	08
Data protection policy	09

1 | DISCRETIONARY FINANCIAL ASSET MANAGEMENT

BPM – Berlin Portfolio Management GmbH (hereinafter referred to as "BPM") provides discretionary financial asset management services to its clients. Financial portfolio management or discretionary asset management means managing portfolios in accordance with mandates given by clients on a discretionary client-by-client basis where such portfolios include one or more financial instruments.

The portfolio manager receives a mandate from the client to make discretionary investment decisions whenever appropriate under the terms of the agreement and based on investment guidelines agreed with the client. Under the mandate, the portfolio manager is entitled to manage the assets without having to obtain instructions from the client in advance e.g. by buying or selling securities on the stock exchange or outside the stock exchange, whether in the form of fixed-price or commission-based transactions. For more information on the execution of investment decisions, please refer to section 9 (Best Execution Policy).

BPM is responsible for ensuring that the asset management and the chosen investment strategy are appropriate for the client. To make investment decisions that are appropriate for the client, BPM shall ask the client to provide information about his or her knowledge and experience with investment transactions, financial circumstances and investment objectives prior to concluding an asset management agreement.

For the BPM mandate the client will open a custodian account and a clearing account with a custodian bank on his/her own behalf. This will be used to hold the client's assets managed by BPM and to execute transactions under the asset management mandate. The client is the sole owner of the account who can authorise transfers and withdrawals from this account. The client shall grant BPM a discretionary authority under which BPM will be authorised to execute transactions in the name and for the account of the client over funds held in the client's account and custody account and in compliance with the investment guidelines set out in the asset management agreement. Save for the management fee, BPM is not entitled to acquire ownership or possession of the client's assets or to transfer them to other accounts or custody accounts.

With respect to investment decisions, the asset manager shall be bound by the investment guidelines agreed with the client in advance and set out in the asset management agreement. While BPM has the duty to act in the best interest of the client at all times, conflicts of interest may still arise under certain circumstances. Please refer to Section 8 (Conflicts of Interest Policy) for more details on how we deal with conflicts of interest.

Asset management strategies are typically aimed at long-term preservation and accumulation of wealth. The client should therefore have a long-term investment horizon as this increases the likelihood that the portfolio will recover any short-term losses. It is not recommended to invest assets needed to cover day-to-day living expenses or other obligations in the short to medium term.

Asset management can expose the client's financial situation to risks. While the asset manager is obliged to act in the best interest of the client, the asset manager may make mistakes or take an inappropriate course of action. BPM cannot guarantee investment performance or avoidance of any losses. Clients can incur losses even if the asset manager follows the chosen investment strategy, e.g. due to changes in the market.

2 | INVESTMENT PHILOSOPHY

The investment philosophy of BPM comprises the provision of an individual investment portfolio which, in addition to a solid and stabilizing basis, contains additional themes or strategy-specific modules. Each individual portfolio can be assigned to one of the three main strategies "defensive", "balanced" or "dynamic".

The investment decisions within the underlying portfolio are based on an ongoing macroeconomic analysis that takes into account economic aspects such as debt, economic growth, interest rates, inflation rates and exchange rates, as well as an analysis of the financial markets, including price / earnings ratios, price / cash flow ratios, dividend yields, dividend payout ratios across major financial markets of the world. Individual investment decisions are based on the principles of broad diversification, cost-effectiveness and the reduction of undesired currency exposure, issuer and other risks.

The investment decisions concerning additional modules are mainly guided by important social, technological or economic trends as well as special situations. In addition, these modules are used to fine-tune investor interests in terms of individual risk tolerance and return expectations. BPM uses a range of information sources in the course of secondary research to identify promising trends. BPM uses the principles of broad diversification and cost reduction as well as additional valuation criteria (e.g. price / earnings or price / cash flow ratios) and risk indicators (e.g. volatility, market capitalisation, ratings, etc.) to make individual investment decisions.

3 | NAME AND ADDRESS OF THE INVESTMENT FIRM

BPM – Berlin Portfolio Management GmbH provides comprehensive information about its services on the website www.berlin-pm.com. If you have any questions, we will be happy to assist you by email at info@berlin-pm.com or in person. You can also contact BPM employees by telephone from Monday to Friday, from 9:00 to 18:00, excluding public holidays.

BPM – Berlin Portfolio Management GmbH
Kurfürstendamm 218
10719 Berlin

Tel.: +49 30 8871087-0
E-mail: info@berlin-pm.com
www.berlin-pm.com

4 | COMMUNICATING WITH BPM – BERLIN PORTFOLIO MANAGEMENT GMBH

Language of communication

You can communicate with BPM in German, English and Spanish. Individual employees can also communicate in Dutch, Hebrew and French. The contractual documents and information shall be provided in the German, English and Spanish language.

Methods of communication

BPM typically communicates with clients by telephone, post and email using the email address specified or using an electronic mailbox in the protected client area of its website www.berlin-pm.com. BPM reserves the right to provide clients with important information in writing. As for transfers to a reference bank account held at a third-party bank of the client and specified to the custodian bank in advance, BPM does not accept any telephone orders or instructions. It also reserves the right to record individual telephone conversations and store these records on a long-term basis to the extent this is required by law. Information given by telephone shall not in any case give rise to an advisory relationship between the client and BPM.

5 | NATURE, FREQUENCY AND TIMING OF REPORTS ON THE SERVICES PROVIDED

As at the end of each calendar month, the chosen custodian bank will provide the client with a statement of assets and transactions executed on the client's behalf by BPM. In addition, the BPM or the custodian bank shall promptly inform the client of any recent decline in the value of assets compared with the previous report, which exceeds the percentage threshold the client has defined. Please refer to the asset management agreement for more information on these reports.



6 | NAME AND ADDRESS OF THE COMPETENT AUTHORITY

BPM is a financial services institution regulated by the German Federal Financial Supervisory Authority (BaFin), Marie-Curie-Straße 24–28, 60439 Frankfurt am Main, Germany.

The company is registered with BaFin under the institution ID 123635.

7 | MEASURES TO PROTECT FINANCIAL INSTRUMENTS OR CLIENT FUNDS HELD BY BPM

BPM has, on a voluntary basis, taken out a wealth damage liability insurance with a reputable insurance company. BPM is also by law member of the Compensatory Fund of Securities Trading Companies (Entschädigungseinrichtung der Wertpapierhandelsunternehmen; EdW), 10865 Berlin.

Clients who use investment services provided by financial institutions such as BPM are protected by law under the Compensation Scheme of Securities Trading Firms (EdW). EdW provides compensation if a securities trading company is no longer in the position to meet its obligations to clients arising from securities transactions after BaFin has determined that a compensation case exists. As BPM as a portfolio manager a) has no authorisation to accept client money and b) is not trading securities in its own right (BPM is a non-trading book institution), the occurrence of such a compensation case is extremely unlikely in practice.

As a provider of financial services, BPM is not entitled to hold and acquire financial instruments and funds on behalf of clients in its own right. For trading and custody of securities, BPM uses the services of the chosen custodian bank authorised to engage in deposit and custody transactions. German custodian banks used by clients of BPM are members of the Deposit Guarantee Fund of the Federal Association of German Banks (Bundesverband deutscher Banken e.V.) or the Compensation Scheme of German Private Banks (Entschädigungseinrichtung deutscher Banken GmbH).

8 | CONFLICTS OF INTEREST POLICY

With its business model, which does not include commission payments from third parties (product distributors in particular), refunds from investment orders and initial charges, the potential for conflicts of interest at BPM is very limited. In particular, in the context of portfolio management, BPM receives exclusively the management fees agreed by the client. Fees received for advisory and management services provided to retail and special funds, which may be used in management mandates for clients, are excluded from this.

Nevertheless, conflicts of interest cannot be completely ruled out. In accordance with the relevant laws and regulations, we would like to take this opportunity to inform you about our conflicts of interest policy.

In principle, conflicts of interest can arise between clients and our firm, our management, our employees, affiliated companies, as well as other BPM clients.

To prevent conflicts of interest from affecting order execution or asset management, we have obliged our employees to comply with high ethical standards. BPM expects its employees to act with due care and diligence, honesty and professionalism, continue educating themselves, comply with market standards and to prioritise client interests at all times. In addition, as a member of the German Association of Independent Asset Management Companies (Verband unabhängiger Vermögensverwalter; VuV), BPM subscribes to the code of ethics of the VuV.

To prevent any potential conflicts of interest, BPM has taken i.a. the following measures:



- The firm has appointed a compliance officer, who is responsible for the identification, prevention and management of conflicts of interest;
- The firm has put in place organisational procedures for safeguarding client interests in asset management;
- Rules on the acceptance and granting of inducements and their disclosure;
- Remuneration system for employees, which is consistent with the statutory requirements, and does incentivise employees to take disproportionate risks or to act against the interests of the clients;
- Separation of business areas and simultaneous control of the flow of information (establishment of confidentiality areas);
- Identification of all employees, who may have conflicts of interest in the context of their activities;
- Disclosure of securities transactions of all employees to the competent authority;
- Rules on personal account dealing of bodies and employees of BPM;
- Rules on the acceptance of gifts and other benefits by employees;
- Execution of orders in accordance with the best execution policy;
- Employee training.

We would like to draw attention to the following points:

- BPM often receives inducements in connection with the sale of securities (e.g. portfolio-based commissions or refunds) in the form of custody fees, stock exchange, fiduciary commissions, brokerage fees and other charges from banks, investment companies and security issuers. In addition, BPM may also receive sales commissions such as placement commissions and / or issue and redemption premiums. **The BPM – Berlin Portfolio Management GmbH passes any such inducements to its clients in full. Any such inducements will be paid out directly to its clients.**
- A typical conflict of interest in asset management can arise when a performance-related remuneration is agreed on. To minimize this risk, BPM offers its clients a fixed asset management fee without a success component. If individual clients request this component, BPM ensures the best possible protection of the clients' interests by ensuring suitable framework conditions (high water mark, hurdle rate, etc.).
- To the extent permissible by law, BPM also occasionally receives **non-cash inducements** from service providers in connection with its securities business in the form of financial analyses or other information material or training courses and to a lesser extent, technical service and equipment to access third-party information and distribution systems. The acceptance of such inducements is not directly associated with services performed on behalf of the client. These inducements are used, in particular, in capital markets research to ensure that BPM provides services to the high standards expected by its clients, and continues improving them.
- As a result of its activities as asset managers and investment advisors for institutional clients, in particular, investment companies, investment management companies and other capital market participants, BPM may receive fees from investment companies based on asset management and / or advisory mandates. We will disclose the amount of such fees to the clients concerned upon request.

We are happy to provide our clients with further details of this policy upon request.

9 | BEST EXECUTION POLICY

1. Scope

The following principles apply to the execution of investment decisions made by BPM in accordance with the asset management agreement and under the investment guidelines laid down therein for the purpose of buying or selling securities or other financial instruments (orders).

2. Priority of client instructions

The client can give instructions to the BPM as to the execution venues in which orders shall be executed. Any such instructions given by the client shall take priority over this execution policy.



Please note: In this case, BPM is not going to execute the order in accordance with this best execution policy.

3. Principles of best execution

BPM shall take into account all the relevant criteria to achieve the best possible result, including but not limited to the price of the financial instrument, the cost and speed of order execution, the probability of order execution, the order type, volume and the settlement modalities. The best possible result here focuses on the overall fee, i.e. the price of the financial instrument and all costs associated with the execution of the order.

4. Execution of the investment decision by the custodian bank

BPM does not execute investment decisions. Instead, it instructs the custodian bank of the client to execute them. The best execution policy of the custodian bank applies accordingly.

BPM shall review the best execution policy of the custodian bank of the client on the basis of order slips, but at least once a year, for compliance with the obligations set out therein by the custodian bank.

10 | VALUATION OF FINANCIAL INSTRUMENTS

BPM shall use the valuation provided by the custodian of the client to value financial instruments held in the client portfolio.

Investment funds are generally valued at the share prices published by the respective fund. In contrast, publicly traded securities (including index funds, ETFs) are valued at the respective closing prices. If there is no price available for a financial instrument, the fair value is determined by using generally accepted valuation standards or the last available market price is used.

The financial instruments in the client portfolio shall be valued no later than by the respective reporting dates. BPM may potentially combine securities orders and forward them as a collective order for execution. If this collective order is executed at different prices, BPM shall break down the individual client custody accounts by average values. BPM is not permitted to give preference to individual clients.

11 | COSTS

The management fee shall be agreed with the client and laid down in the asset management agreement. This fee will differ from client to client depending on the assets under management as well as the complexity of the management mandate. The management fee is debited on a quarterly basis from the respective custody account of the client. The client has the right of objection. At the beginning and the end of the mandate, the management fee will be calculated on a pro rata basis.

The BPM's management fee does not cover the costs of the custodian bank, such as flat fees (all-in-fees), custody account fees, transaction costs and transaction settlement fees as well as any taxes payable on securities income or settlement fees. These are invoiced separately by the custodian bank and debited from the client's account.

In order to ensure the highest possible transparency of the costs of asset management by BPM, a comprehensive and individual overall cost disclosure and ex-ante cost estimate in accordance with Art. 24 Para. 4 MiFID II is prepared and presented to the client before the start of the contract.

12 | AUTHORISATION TO PROVIDE SECURITIES SERVICES

BPM – Berlin Portfolio Management GmbH has obtained the necessary authorisation to provide the following financial services:

- Investment advice pursuant to Article 1 (1a) (2) (1a) of the German Banking Act (KWG);
- Investment broking pursuant to Article 1 (1 a) (2) (1) KWG;
- Contract broking pursuant to Article 1 (1 a) (2) (2) KWG;
- Portfolio management pursuant to Article 1 (1a) (2) (3) KWG;

13 | CONTACTS

BPM – Berlin Portfolio Management GmbH
Kurfürstendamm 218
10719 Berlin

Tel.: +49 30 8871087-0
E-mail: info@berlin-pm.com
www.berlin-pm.com

DATA PROTECTION POLICY OF BPM – BERLIN PORTFOLIO MANAGEMENT GMBH LEGAL INFORMATION

We are glad that you show interest in our company. Data protection is of particular importance for the management of BPM – Berlin Portfolio Management GmbH.

The processing of personal data, such as the name, address, e-mail address or telephone number of a person, is always in accordance with the General Data Protection Regulation and in accordance with the country-specific data protection provisions applicable to BPM – Berlin Portfolio Management GmbH. By means of this legal instruction, our company would like to inform you about your rights.

BPM – Berlin Portfolio Management GmbH, as the responsible party, has implemented numerous technical and organizational measures in order to ensure the most complete possible protection of the processed personal data.

1. Name and address of the responsible party

The party responsible within the meaning of the General Data Protection Regulation, other data protection laws in the Member States of the European Union and other provisions of a data protection character is:

BPM – Berlin Portfolio Management GmbH
Kurfürstendamm 218
10719 Berlin, Germany
Tel.: +49 30 8871087-0
E-mail: info@berlin-pm.com
Website: www.berlin-pm.com

An external company data protection officer pursuant to Article 37 of the EU General Data Protection Regulation (GDPR) has been appointed:

Dipl.-Inform. Thomas Ziemer
c/o maximum data protection
Glockenblumenweg 50 B
12357 Berlin, Germany
Mail: dsb-bpm@datenschutz-maximum.de
Appointment as data protection officer from 24.05.2018.

2. Rights of the client

2.1 Right to confirmation

Each affected person has the right, as granted by the European legislator and regulator, to require the responsible party to confirm whether personal data relating to him / her is being processed. If an affected person wishes to make use of this confirmation right, they can contact our data protection officer or another employee of the responsible party at any time.

2.2 Right to information

Any person affected by the processing of personal data shall have the right granted by the European legislator and regulator to obtain at any time, free of charge, from the responsible party any personal data stored about him or her and a copy of that information. Furthermore, the European legislator and regulator has granted the affected person disclosure of the following:

- the processing purposes
- the categories of personal data being processed
- the recipients or categories of recipients to whom the personal data have been disclosed or are still being disclosed, in particular to recipients in third countries or to international organizations
- if possible, the planned duration for which the personal data will be stored, or, if this is not possible, the criteria for determining that duration, the right to rectification or erasure of the personal data or restriction of the processing by the responsible party
- the existence of a right to complain to a supervisory authority if the personal data are not collected from the affected person: all available information on the origin of the data the existence of automated decision-making including profiling in accordance with Article 22 paragraphs 1 and 4 GDPR and - at least in these cases - provide meaningful information about the logic involved and the scope and intended impact of such processing on the affected person

In addition, the affected person has a right of access as to whether personal data has been transmitted to a third country or to an international organization. In this case, the af-



affected person has the right to obtain information about the appropriate guarantees in connection with the transfer.

If an interested party wishes to exercise this right to information, they may at any time contact an employee of the responsible party. (Article 15 (1) GDPR / DSGVO)

2.3 Right to rectification

Any person affected by the processing of personal data has the right granted by the European legislator to demand the immediate correction of incorrect personal data concerning him / her. Taking the purpose of the processing into account, the affected person has the right to request the completion of incomplete personal data, also by means of a supplementary declaration.

If an affected person wishes to exercise this right of rectification, they may, at any time, contact an employee of the responsible party. (Article 16 GDPR / DSGVO)

2.4 Right to cancellation (right to be forgotten)

Any person affected by the processing of personal data shall have the right granted by the European legislators and regulators to require the responsible party to immediately delete the personal data concerning him / her, provided that one of the following reasons is satisfied and the processing is not required:

- The personal data has been collected for such purposes or otherwise processed for which they are no longer necessary.
- The affected person revokes their consent, on which the processing was based in accordance with Article 6 (1) (a) of the GDPR or Article 9 (2) (a) GDPR / DSGVO, and there is no other legal basis for the processing.
- The affected person submits an objection to the processing pursuant to Art. 21 (1) GDPR / DSGVO, and there are no legitimate reasons for the processing, or the data subject submits an objection to the processing in accordance with Art. 21 (2) GDPR / DSGVO.
- The personal data were processed illegitimate.
- The deletion of personal data is required to fulfill a legal obligation under European law or the law of the Member States to which the responsible party is subject.
- The personal data were collected in the context of offered services by the information society pursuant to Art. 8 para. 1 GDPR / DSGVO.

If one of the above reasons is correct and an affected person wishes to arrange for the deletion of personal data stored by

BPM – Berlin Portfolio Management GmbH, they may at any time contact our data protection officer or another employee of the responsible party.

The data protection officer of BPM – Berlin Portfolio Management GmbH or another employee will arrange that the request for deletion be fulfilled immediately.

If the personal data have been made public by BPM – Berlin Portfolio Management GmbH and if our company is responsible for deleting personal data as the person responsible pursuant to Art. 17 para. 1 GDPR / DSGVO, BPM – Berlin Portfolio Management GmbH shall apply technology and implementation costs in appropriate measures, including technical means, to inform other data controllers processing the published personal data that the data subject has deleted all links to such personal data from those other data controllers or has requested copies or replicas of such personal data, unless the processing is required. The data protection officer of BPM – Berlin Portfolio Management GmbH or another employee will arrange the necessary in individual cases.

2.5 Right to restriction of processing

Any person affected by the processing of personal data has the right, granted by the European directive and regulatory authority, to require the controller to restrict the processing if one of the following conditions applies:

The accuracy of the personal data is contested by the affected person for a period of time that enables the responsible party to verify the accuracy of the personal data. The processing is unlawful, the affected person refuses to delete the personal data and instead requests the restriction of the use of personal data. The responsible party no longer needs the personal data for the purposes of processing, but the affected person requires them to assert, exercise or defend legal claims. The affected person has objection to the processing acc. Art. 21 para. 1 GDPR / DSGVO and it is not yet clear whether the legitimate reasons of the responsible party outweigh those of the affected person.

If one of the above-mentioned requirements is met and an affected person wishes to request the restriction of personal data stored by BPM – Berlin Portfolio Management GmbH, it may at any time contact our data protection officer or another employee of the responsible party. The data protection officer of BPM – Berlin Portfolio Management GmbH or another employee will initiate the restriction of processing.



2.6 Notification obligation in connection with the correction or deletion of personal data or the restriction of processing

Any affected person shall have the right granted by the European legislator and regulator to be informed by the responsible party of the recipients to whom the personal data of the affected person have been disclosed, if he / she so requests.

The responsible party shall inform all recipients who have been disclosed personal data of the affected person of any correction or deletion of personal data or a restriction of processing under Article 16, Article 17 paragraph 1 and Article 18 GDPR / DSGVO, unless this proves to be impossible or is associated with a disproportionate effort.

2.7 Right to data portability

Any person affected by the processing of personal data shall have the right conferred by the European legislator and regulator to obtain the personal data concerning him / her provided to a responsible party by the affected person in a structured, common and machine-readable format. It also has the right to transfer this data to another person responsible without hindrance by the responsible party to whom the personal data was provided, provided that the processing is based on the consent pursuant to Art. 6 (1) (a) GDPR / DSGVO or Art. 9 Abs 2 (a) of the GDPR / DSGVO or on a contract pursuant to Article 6 (1) (b) of the GDPR / DSGVO and processing by means of automated processes, unless the processing is necessary for the performance of a task of public interest or in the exercise of public authority, which has been assigned to the responsible party.

Furthermore, in exercising their right to data portability under Article 20 (1) of the GDPR / DSGVO, the affected person has the right to obtain that the personal data are transmitted directly from one responsible party to another, insofar as this is technically feasible and if so this does not affect the rights and liberties of others.

In order to assert the right to data portability, the affected person may at any time contact the data protection officer appointed by BPM – Berlin Portfolio Management GmbH or another employee.

2.8 Right to object

Any person affected by the processing of personal data shall have the right, conferred by the European legislator and reg-

ulator, for reasons arising from its particular situation, to object to the processing of personal data relating to Article 6 (1) (e) or (f) GDPR / DSGVO. This also applies to profiling based on these provisions.

BPM – Berlin Portfolio Management GmbH will no longer process your personal data in the event of an objection, unless we can prove that there are compelling reasons for processing which exceed the interests, rights and freedoms of the affected person, or the processing serves the purpose of assertion, exercise or defense of legal claims.

If BPM – Berlin Portfolio Management GmbH processes personal data in order to operate direct advertisement, the affected person has the right to object at any time to the processing of personal data for the purpose of such advertising. This also applies to the profiling, as far as it is associated with such direct advertisement. If the affected person objects to BPM – Berlin Portfolio Management GmbH for the purposes of direct advertisement, BPM – Berlin Portfolio Management GmbH will no longer process the personal data for these purposes.

In addition, the affected person has the right to object to the processing of personal data for reasons arising from his / her particular situation, for scientific or historical research purposes or for statistical purposes pursuant to Art. 89 (1) GDPR / DSGVO. Objections shall be lodged unless such processing is necessary to fulfill a task of public interest.

In order to exercise the right to object, the affected person can directly contact the data protection officer of BPM – Berlin Portfolio Management GmbH or another employee. The affected person is also free, in the context of the use of information society services, notwithstanding Directive 2002/58 / EC, to exercise its right of opposition through automated procedures using technical specifications (Article 21 GDPR / DSGVO).

2.9 Automated decisions in individual cases including profiling

Any person affected by the processing of personal data shall have the right, as granted by the European legislator and regulator, not to be subject to a decision based solely on automated processing, including profiling, which has a legal effect on it or, in a similar manner, significantly affects it; unless the decision is necessary for the conclusion or performance of a contract between the data subject and the responsible party, or is permitted by European Union or Member State legislation to which the controller is subject, and that legislation is adequate to safeguard rights and lib-



erties and the legitimate interests of the affected person or with the express consent of the affected person.

If the decision to conclude or fulfill a contract between the data subject and the person responsible is necessary or if it is made with the express consent of the data subject, BPM – Berlin Portfolio Management GmbH shall take appropriate measures to safeguard the rights and freedoms as well as the legitimate interests of the affected person, including at least the right to obtain the intervention of a person by the responsible party, to express his / her own position and to contest the decision.

If the affected person wishes to assert any rights with respect to automated decisions, they may at any time contact

our data protection officer or another employee of the responsible party (Article 21 GDPR / DSGVO).

2.10 Right to revoke a data protection consent

Any person affected by the processing of personal data has the right, granted by the European legislator and regulator, to revoke consent to the processing of personal data at any time.

If the affected person wishes to assert their right of withdrawal of consent, they may at any time contact our data protection officer or another employee of the responsible party (Article 7 (3) GDPR / DSGVO).

BPM – Berlin Portfolio Management GmbH
Uhlandstraße 33
10719 Berlin
Germany
Tel.: +49 30 8871087-0
E-mail: info@berlin-pm.com
www.berlin-pm.com

