

# Privacy Principles

The protection of privacy and personal data is an important concern to which AllianzGI pays special attention. We believe in transparency and are committed to being clear about our privacy practices, including how we process personal data.

To comply with the legal requirements under the EU General Data Protection Regulation, we have revised our Privacy Policies (see below).

If you cannot find the privacy notice applying to you or you have any other questions regarding data privacy, please reach out to [dataprivacy@allianzgi.com](mailto:dataprivacy@allianzgi.com).

---

Last updated: 12/2019

## Data Protection Policy

**As a data controller, Allianz Global Investors GmbH (“Allianz Global Investors” or “we”, Bockenheimer Landstr. 42-44, 60323 Frankfurt, Germany) would like to thank you for visiting our website (“website”) and for your interest in our services and products.**

**Your privacy is important to us and we want you to feel comfortable when visiting our site. We take steps to ensure that your personal data, (i.e. any items of information concerning the personal or material circumstances of an identified or identifiable natural person) collected, processed and used in connection with your visit to our website will be protected. Unless you have received a personal email from us we permit the anonymous use of the website, or the use of the site under a pseudonym as far as technically possible and reasonable.**

This Data Protection Policy may be updated from time to time. We therefore ask you to consult it regularly.

We have created this Data Protection Policy to explain how and why specific types of personal data are collected from users of this website, are processed and used. This Data Protection Policy also provides an overview of the use of data that is publicly available on other websites and sources and of the appropriate protection measures taken to safeguard your personal data.

## What is the purpose and scope of this Data Protection Policy?

This Data Protection Policy applies to all personal data collected, processed and used by Allianz Global Investors when you visit the website and for the use of data that is publicly available on other websites and sources. It does not apply to websites controlled by third parties to which the website may contain links (“third-party websites”).

Please check the data protection policies of third-party sites, as Allianz Global Investors is not responsible for the content or privacy measures of third-party sites and has no control over them.

The content of this Data Protection Policy may also be subject to any additional conditions or disclaimers or other contractual terms that you have entered into with Allianz Global Investors, as well as any applicable and binding laws and regulations.

## What information do we collect from you and for what purposes?

When you visit the website, our web server automatically records details of your visit, so-called "**Usage Data**" (for example your IP address, the website from which you linked to our website, the type of browser software used, the individual sub-pages of the website that you actually accessed, the date and duration of your visit).

We also collect, process and use personal data that you provide through the website, such as personal details (i.e. name, gender, address, email address, telephone/fax number) that you enter on a login page or when you subscribe to an email newsletter or when you apply for a job at Allianz Global Investors online ("**User Data**").

We also receive certain data from our affiliate Allianz Global Investors U.S. LLC ("**AllianzGI US**") that stems from publicly available sources (e.g. freely available on the Internet) ("**Analytical Data**"), inter alia to evaluate and prepare investment decisions as well as client meetings. Analytical Data regularly do not contain personal data, but this cannot be excluded for all Analysis Data.

Allianz Global Investors collects, processes and uses Usage Data and User Data for:

- the purposes of technical administration and research and development of the website;
- customer and user management;
- marketing, to inform you about our services and products;
- online application processes

## On what legal basis do we process the data, and for how long do we store your personal data?

Your Usage Data and User Data is processed in accordance with the above-mentioned purposes for the completion of (pre-)contractual measures (Article 6(1)(b) GDPR) and to pursue our legitimate interests (Article 6(1)(f) GDPR), such as the further development of the website or marketing.

As far as Analysis Data contain personal data, we process such data to pursue our legitimate interests (Art. 6(1)(f) GDPR). We want to better prepare investment decisions as well as client meetings and can carry out more precise assessments in advance of these decisions/meetings based on the Analysis Data to improve our services provided to you. If we intend to process Analysis Data for other purposes, in particular for the performance of a contractual relationship, we will inform the data subjects separately if necessary.

We store your personal data for as long as we need it to achieve these objectives. As soon as we no longer need your personal data for the purposes mentioned, we will delete the data from our systems, unless we are legally obliged to store it.

## How do we use tracking technologies?

Allianz Global Investors uses tracking technologies such as cookies and tags. For details on how we use cookies and similar technologies, especially for the purposes of marketing, market and opinion research, please refer to our [Allianz Global Investors Cookie Policy](#).

## Who do we share your information with?

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 marketing agencies or web analytics service providers within and outside of your country of residence.

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

Your personal data may be transferred to recipients in countries outside the European Union or the European Economic Area, which may have a lower level of data protection. Unless the EU Commission has already 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 and can be accessed [here](#).

Whenever we transfer your Personal Data within the Allianz Group to an OE outside of the EU / EEA, we will do so on the basis of Allianz' approved binding corporate rules known as the Allianz Privacy Standard ("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.

## What security measures have we implemented to protect your information we collected through our website?

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.

## How do we handle electronic messages sent to and from Allianz Global Investors?

All electronic messages sent to and from Allianz Global Investors are protected by appropriate technical and organisational measures within our systems, and may only be accessed by individuals not directly involved in the communication in specific, justified cases according to the applicable laws and regulations (e.g. a court ruling, suspected criminal behaviour, breach of supervisory obligations); they are only accessed by certain individuals in defined functions (e.g. legal, compliance, risk). Each part of the procedure and the search criteria used are logged.

## What should you bear in mind when sending data over the internet?

The internet is generally not considered to be a secure environment, and information sent via the internet (such as to or from the website, or as an electronic message) may be intercepted by unauthorised third parties, which may lead to divulging information, changes to content or technical failure. Even if both the sender and the recipient are located in the same country, data sent via the internet may be transmitted across international borders and forwarded to a country where the level of privacy is lower than in your country of residence.

Please note that we do not accept any responsibility or liability for the security of your data while it is being transmitted via the internet to Allianz Global Investors. To protect your privacy, we remind you that you can use other means of communication with Allianz Global Investors where appropriate.

## How can you exercise your rights as a user?

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;
- Withdraw your 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.

In addition, you have the right to object to the processing of your personal data on grounds relating to your particular situation, which prevail over our legitimate reasons for processing. In such cases, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves to establish, exercise or defend legal claims.

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

Please contact us if you have any questions or comments regarding privacy or to exercise your aforementioned rights:

Allianz Global Investors GmbH  
Data Protection Officer  
Legal & Compliance  
Bockenheimer Landstraße 42-44  
60323 Frankfurt  
Germany

or send an email to:  
[privacy@allianzgi.com](mailto:privacy@allianzgi.com)

## Use of Social Media plugins:

Our Site uses the following Social Media Plugins ("Plugins")

Facebook Share Button operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA

Tweet Button operated by Twitter Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA

LinkedIn Share Button operated by LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA

Xing share button, operated by XING AG, Dammtorstrasse 29-32, 20354, Hamburg, Germany

YouTube is operated by YouTube LLC, headquartered at 901 Cherry Avenue, San Bruno, CA 94066, USA.

YouTube is represented by Google Inc., based in 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

Soundcloud is operated by SoundCloud Limited, headquartered at 33 St James Square, London SW1Y 4JS, UK.

All plug-ins are labelled with the brand of the respective operator (the "operators"): Facebook, Twitter, LinkedIn, Xing, YouTube and Soundcloud.

When you visit the web page that contains a social network plug-in (e.g. social sharing), your browser creates a direct connection to the operator's servers. The operator submits the content of the plug-in directly to your browser, which embeds it in the web page, thereby enabling the operator to obtain the information that you have accessed the corresponding sub-page of our website. Allianz Global Investors therefore has no control over the data collected by the plug-in and we inform you to the best of our

knowledge that: The embedded plug-ins inform the operator that you have accessed the corresponding sub-page of our website. If you do not want this information to be transmitted to the operators, you must log out of your respective account with them before visiting our website.

For more information on the purpose and scope of collection, processing and use of data, please refer to the data protection policies of these operators:

Facebook: <https://de-de.facebook.com/about/privacy/>

Twitter: <https://twitter.com/privacy>

LinkedIn: <https://www.linkedin.com/legal/privacy-policy>

XING AG: [https://www.xing.com/app/share?op=data\\_protection](https://www.xing.com/app/share?op=data_protection)

YouTube: <https://www.google.de/intl/de/policies/privacy/>

Soundcloud: <https://soundcloud.com/pages/privacy>