Information on applicable data protection rules in the countries participating in the Beneficial Ownerhip Registers Interconnection System (BORIS)

The information below has been provided by the countries participating in BORIS in relation to the following questions:

Question 1: For how long is the information filed by corporate and other legal entities as well as for trusts and other types of legal arrangements available in the national central register(s) holding the beneficial ownership information? What are the national rules in this regard?

Question 2: Who is the national data controller of your country that is responsible for the information made available in the national central register(s) holding the beneficial ownership information? In other words, who should data subjects contact in your country for the effective exercise of their rights to information, to access, to rectify and to object according to the applicable data protection legislation? Please provide the name of the institution/organisation, contact details and homepage.

Question 3: Please provide the privacy statement that you currently apply on your national central register(s) holding the beneficial ownership information.

Country	Question 1	Question 2	Question 3
Austria	Data about a beneficial owner of a company shall cease to be accessible once ten years have elapsed following the termination of its beneficial ownership of the company and the data of a legal entity upon expiry of ten years following the removal of the legal entity in the Register of beneficial owners. However, historic data is only displayed in the excerpts if that option is deliberately chosen.	The Austrian Federal Ministry of Finance	The Austrian Beneficial Owner Register does not apply an explicit privacy statement. The matter is regulated by the national legislation.

Belgium	All information recorded are kept for a period of 10 years from the date of the closing of the entity.	The FPS Finance (Boulevard du Roi Albert II 33, 1030 Brussels), represented by the Chairman of the Management Committee, is the controller of personal data within the framework of the execution of its legal objectives.	The law of August 3rd 2012, laying down various provisions as regards the processing of personal data carried out by the Federal Public Service Finance within the framework of its objectives, has set up a Department of Information Security and Privacy Protection within the FPS Finance, which assists the Data Protection Officer - DPO. [3] The Data Protection Officer is the head of the Department of Information Security and Privacy Protection and can be reached via the e-mail address <u>dataprotection@minfin.fed.be</u> (link sends e-mail). The Data Protection Officer is the person in charge of answering every question as regards the processing of your personal data as well as the exercise of your rights stipulated in the General Data Protection Regulation. He/she will answer every question whose answer is not mentioned in the present declaration.
Bulgaria	The BO information filed by corporate and other legal entities as well as for trusts and other types of legal arrangements in the BO sections of the Commercial Register and Non- Profit Legal Entities Register and of the BULSTAT Register is available without a time limit.	The owner and administrator of the BO data in the respective registers is the Registry Agency: Registry Agency 20 Elisaveta Bagryana Str. 1111 Sofia, Bulgaria https://www.registryagency.bg The supervision over the compliance of the GDPR requirements is made by the Commission for Personal Data Protection:	Personal data protection policy regarding the Commercial Register and the Register of Non-Profit Legal Entities is accessible on the following address: <u>https://portal.registryagency.bg/en/page/28</u>

		Commission for Personal Data Protection 2 Prof. Tsvetan Lazarov Blvd. 1592 Sofia, Bulgaria <u>https://www.cpdp.bg/en/index.php?p=home&aid=0</u>	
Croatia	Permanently according to the provision of Article 32(4) of AMLTF Law.	On behalf of Anti-Money Laundering Office (FIU Croatia), the Register of Beneficial Owners is operationally managed by the Financial Agency. The Financial Agency is obliged to: • establish, keep and manage the Register • collect, record, process and store the data from the Register • enable the input and update of data in the Register • enable the availability of data from the Register • verify the data in the Register. The Financial Agency is authorized to manage the database of the Register of Beneficial Owners, maintain and provide the protection of the database and of the documents stored in the archives of the Register. Financial Agency (FINA) Vukovarska Street 70 Zagreb, Croatia tel: 0800 0080 e-mail: info@fina.hr homepage: https://www.fina.hr National data controller: Croatian Personal Data Protection Agency Selska cesta 136 Zagreb, Croatia	Personal data on beneficial owner(s) of legal entities founded on the territory of the Republic of Croatia and on beneficial owner(s) of trusts and similar legal arrangements of foreign law are collected based on Article 33(4) of Anti-Money Laundering and Financing of Terrorism Law (OG, No 108/17 and 39/19) and Rulebook on the Register of Beneficial Owners (OG, No 53/19 and 1/20).

		Tel. 00385 (0)1 4609-000	
		Fax. 00385 (0)1 4609-099	
		e-mail: <u>azop@azop.hr</u>	
		homepage: <u>https://azop.hr</u>	
		Personal data on beneficial owner(s) of legal entities founded on the territory of the Republic of Croatia and on beneficial owner(s) of trusts and similar legal arrangements of foreign law are collected based on Article 33(4) of Anti-Money Laundering and Financing of Terrorism Law (OG, No 108/17 and 39/19) and Rulebook on the Register of Beneficial Owners (OG, No 53/19 and 1/20).	
Cyprus	The information will be presented in the Central Register of Beneficial Ownership of Companies and other legal entities (the «BO» register) and through the system of interconnection of registers without time limit as long as the company is registered. In case of strike off of a company, or other legal entity, from the relevant register kept by the Registrar of Companies and Intellectual Property, the information shall be made available through the BO register and through the system	The national data controller responsible for the information made available in the Central Register of Beneficial Ownership of Companies and Other Legal Entities is: The Department of Registrar of Companies and Intellectual Property (DRCIP) (ex Department of Registrar of Companies and Official Receiver (DRCOR)) Corner Makariou III Avenue and Karpenisiou Street «XENIOS» Building, 7th Floor, Office No. 701 1427 Nicosia Tel.+357 22404301-302 E mail: deptcomp@drcor.meci.gov.cy, Ubos@meci.gov.cy https://www.companies.gov.cy/en/ In Cyprus, the Commissioner for personal data protection is an independent public authority responsible for monitoring the implementation of Regulation (EU) 2016/679 (GDPR) and other laws aiming at the protection of individuals with regards to the processing of their personal data.	As provided in section 61C(18) of the AML/CFT Law and paragraph 3(3) of the Directive for the Beneficial Ownership Register of Express Trusts and Similar Legal Arrangements, access to the information held in the said Register shal be in accordance with the provisions of th Law on the protection of natural persons with regard to the processing of personal data and the free movement of such data, as well as Regulation (EU) 2016/679. The final privacy policy will be published when CyTBOR becomes operational beginning of the year 2022.
	of interconnection of registers, for a period of up to ten (10) years from the date of strike off:	The contact details of the Office of the Commissioner for Personal Data	
	Provided that for the first five	Protection are as follows: Office address:	
	(5) years from the date of strike	Iasonos 1, 1082 Nicosia, Cyprus	
	off of the company or other legal	Postal address	

entity	the information will be	P.O.Box 23378, 1682 Nicosia, Cyprus	
•	ble to everyone. After the	Tel: +357 22818456	
	ve (5) years, the	Fax: +357 22304565	
	ation may be kept in the	Email: commissioner@dataprotection.gov.cy	
	er for five (5) years more	www.dataprotection.gov.cy.	
	cess to that information		
	e allowed only in the		
	t of an administrative or		
	al investigation, for the		
	e		
	nentation of the provisions		
	Prevention and		
	ession of Money		
	ering and Terrorist		
	ing Law of 2007 (the		
), by the Competent		
-	visory Authorities, as well		
-	he FIU, the Tax		
-	ment, the Customs		
	ment and the Police.		
	ding to section $61C(10)$ of		
	evention of Money		
	ering and Terrorist		
	ing Laws of 2007 -2021,		
	ML/CFT Law'), 'If an		
-	s trust or a registered legal		
-	ement is removed from		
	gister as a result of the		
	at the conditions laid		
	n paragraph (5)(b) are not		
	where the express trust or		
	legal arrangement is no		
•	in force, the CySEC shall		
	ue to keep in the Register		
	ormation of that express		
	r similar legal		
	ement and of the		
benefic	cial owners for a period of		

	ten (10) years from the said		
	removal:		
	Provided that after five (5) years		
	from the removal of the express		
	trust or the similar legal		
	arrangement from the respective		
	register, the information referred		
	to in paragraph (1) may be kept		
	in the Register and access to that		
	information shall be allowed		
	only in the context of an		
	administrative or criminal		
	investigation, for the		
	implementation of the provisions		
	of this Law, by the Supervisory		
	Authorities, as well as by the		
	Unit, the Tax Department, the		
	Customs Department and the		
	Police.'		
Czech	The information contained in the	■ EN	The Privacy Statement of the Czech
Republic	beneficial owner register is	Identification and contact details of data controllers (joint controllers	Register of Beneficial Owners is available
	available up to 5 years from the	according to Article 26 GDPR)	at <u>https://esm.justice.cz</u>
	date of dissolution of the legal	- Ministry of Justice - Vyšehradská 16, 128 12 Prague 2, tel.:	
	entity or legal arrangement	221997111, DS ID: kq4aawz, email: posta@msp.justice.cz	
	(trust).	Regional courts and the Municipal Court in Prague according to local	
		jurisdiction - contact details of the relevant courts are available on the	
		portal <u>www.justice.cz</u>	
		■ CZ	
		Identifikace a kontaktní údaje správců osobních údajů (společní správci	
		podle čl. 26 GDPR)	
		- Ministerstvo spravedlnosti, se sídlem Vyšehradská 16, 128 12	
		Praha 2, tel.: 221997111, ID DS: kq4aawz, email:	
		posta@msp.justice.cz	

Příslušné soudy – krajské soudy (s výjimkou Krajského soudu v Praze) a Městský soud v Praze dle místní příslušnosti - kontaktní údaje příslušných soudů jsou k dispozici na portále <u>www.justice.cz</u>	

Denmark	In general information is made	The national data controller according to Directive 95/46/EC art. 2(d) is	The privacy statement is available online
	available indefinitely. The	the Danish Data Protection Agency. For rights to information, to access, to	on: Privacy Statement on Virk.dk
	personal data ceases to be	rectify and to object according to the applicable data protection legislation	
	updated 5 years after a person	contact the Danish Business Authority via <u>virk.dk</u> or <u>erst@erst.dk</u> .	
	has ceased to be active in a		
	company registered with the		
	DBA.		

Estonia	The registers maintain information without a time limit and the information remains accessible for five years after deleting the legal person from the register.	The data of beneficial owner is submitted and publicized via the commercial register information system. Technical support for the commercial register information system is given by the Centre of Registers and Information Systems: Lubja 4, Tallinn 19081, Estonia; Phone: +372 663 6300; mail: <u>rik@rik.ee</u> . Guideline for identification of a beneficial owner is issued by the Ministry of Finance Suur-Ameerika 1, Tallinn 10122; Phone: +372 611 3558; Mail: <u>info@fin.ee</u>	There is no specific privacy statement applicable for the data processing. Data processing is regulated by specific provisions (sections 76–80) of the Money Laundering and Terrorist Financing Prevention Act. Concerning the personal data, the provisions of the Personal Data Protection Act also apply. A data subject has a right of recourse to the Data Protection Inspectorate or a court if the data subject finds that his or her rights are violated in the processing of personal data (Personal Data Protection Act section 28). Estonian Data Protection Inspectorate Väike-Ameerika 19 10129, Tallinn Estonia; Phone: +372 627 4135; Mail: info@aki.ee; http://www.aki.ee/en
---------	--	---	--

Finland	After information is provided to the register it will be available forever.	Finnish Patent and Registration Office Sörnäisten Rantatie 13 C, Helsinki Mailing address: FI-0009, PRH Finland Telephone exchange: +358 29 509 5000 https://www.prh.fi/en/index.html https://www.prh.fi/en/kaupparekisteri/beneficial_owner_details/info rmation_services_and_details.html	Privacy statement from Trade Register: In Finnish: https://www.prh.fi/stc/attachments/rekisteri- _ja_tietosuojaselosteet/kaupparekisteri tietosuojaselo In English: https://www.prh.fi/stc/attachments/rekisteri- _ja_tietosuojaselosteet/englanti/kaupparekisteri_eng_
France	Information is available 10 years after the end of the structure.	The rights to information, access, rectify and object is exercised directly at registrar's level namely: the competent greffier de tribunal de commerce or the French tax administration (see contacts below). If the registrars doesn't answer or refuse to answer, complaints can be addressed to the French data protection commission (CNIL)	https://www.infogreffe.fr/charte_rgpd_traitement_do

Germany	The registers maintain information without a time limit and the information remains accessible even after a legal entity is dissolved or struck off.	Der Bundesbeauftragte für den Datenschutz und die Informationsfreiheit Graurheindorfer Str. 153 53117 Bonn Telefon: +49 (0)228-997799-0 E-Mail: <u>poststelle@bfdi.bund.de</u> <u>https://www.bfdi.bund.de</u>	The privacy statement on the website of the transparency register can be found under the following link: https://www.transparenzregister.de/treg/de/d atenschutzerklaerung

Greece	The information registered in the K.M.P.D. remains available for ten (10) years from the deletion of the corporate or other legal entity from it.	Information not available	Information not available
Hungary	Availability of BO information For the purpose of preventing and combating money laundering and terrorist financing, the registration body shall retain the information of the data provider stored in the beneficial ownership registry for 8 years from the termination of the data provider without a legal successor. The BO information of the corporate and other legal entities as well as for trusts and other types of legal arrangements has been	The registration body which is the National Tax and Customs Authority is the data controller that is responsible for the BO information made available in the BO registry. If the beneficial ownership information of the data provider is classified as "uncertain" as the consequence of the differences notified by the authorities and/or the service providers, the registration body shall notify the data provider of this fact within 5 working days, and draw the data provider's attention by describing the legal consequences referred to in the BO Act to the possibility of amending or confirming the beneficial ownership information notice, the	Information not available

available in our beneficial ownership registry as of early June 2021 (the entry into force of the BO Act); however, it is not fully operating as the authorities and service providers will have access to the BO data stored in the Registry and the Registry will contain the differences to be notified by them from February 2022. Whereas third persons will be able to have access to the information contained in the BO Registry subject to conditions set out in the BO Act in July 2022.	registration body shall not disclose to the data provider the identity of the person sending the notification and the information. If the beneficial ownership information of the data provider is classified as "unreliable" as the consequence of the differences notified by the authorities and/or the service providers and that the data provider did not amend or confirm the BO information in spite of the possibility offered by the registration body's notification, , the registration body shall notify the data provider in an information notice within 5 working days and call upon the data provider by describing the legal consequences to amend or confirm the beneficial ownership information stored in the beneficial ownership registry with its account provider within 5 working days from the receipt of the notification. If the data provider confirms or amends its beneficial ownership information, the registration body shall adjust the value of the BO index to 10 points.	
The BO information of the entities mentioned (data providers) is filed by the account providers (any service providers providing payment accounts to the entities falling under the scope of the BO Act) to the BO registry set up and maintained by the registration body (which is the National Tax and Customs Authority) as follows: Initial data provision in early June The account providers shall transfer to the beneficial ownership registry within 21 days from the entry into force of the BO Act the BO information of the data providers with whom they maintain a business relationship on the date of entry into force of the BO Act (that	In case of the legal consequences applied by the registration body, the data provider may lodge a complaint to the Minister of Finance. The condition for lodging the complaint is the unsuccessfulness of the data provision or data confirmation performed at the data provider's account provider. The complaint shall be assessed by the Minister in an administrative procedure within 30 days from receipt.	

	 is, early June 2021) for keeping a payment account, which information is available to it as a result of the customer due diligence measures referred to in the AML Act. During the course of the data provision the account providers shall also disclose the date of opening of the payment account, in addition to the BO information. Normal data provision as of October 2021 The account providers shall transmit to the registration body the BO information available in their records on the last day of the reference month, as well as the recording date of such information within 5 days from the last day of each calendar month in the manner specified by the registration body. 		
Iceland	The BO information is publicly available as long as the company is registered (not struck off). There is no historical information available for users. A decission has still to be made if historical information will be accessible and how far back.	The national data controller is the Iceland revenue and customs office (Skatturinn), Telephone: +354 442 1000, Link: <u>www.skatturinn.is</u>	The national law concerning BO(<u>82/2019: Lög</u> <u>um skráningu raunverulegra eigenda Lög </u> <u>Alþingi (althingi.is)</u>) and GDPR(<u>https://www.althingi.is/lagas/148c/201</u> <u>8090.html</u>) decide the privacy statement that apply for our national central register(s) holding the beneficial ownership information.

Ireland	The Central Bank will delete from the Beneficial Ownership Register information held in relation to a CFV when ten years elapse from the date of dissolution of that CFV, should such dissolution occur. The beneficial ownership information for corporate and other legal entities will be retained for the lifespan of the entity plus 10 years from the date of dissolution. This is in line with the Companies Act 2014 for the retention of information relating to corporate entities.	https://www.centralbank.ie/fns/privacy-statement - See section titled Your Rights The national data controller is the Central Register of Beneficial Ownership of Companies and Industrial and Provident Societies (RBO). Contact is via email at enquiries@rbo.gov.ie and the website is https://rbo.gov.ie	https://www.centralbank.ie/fns/privacy- statement - See section relating to Beneficial Ownership Register of Certain Financial Vehicles. The privacy & cookie policy is available on the website at: <u>Privacy and</u> <u>Cookie Policy - RBO</u>
---------	---	---	---

Italy	Information not available	Information not available	Information not available

Latvia	Information regarding the beneficial owners of legal persons and foreign subjects is accessible not more than 10 years after the legal person or the branch or representative office of the foreign subject has been excluded from the relevant register.	The Register of Enterprises of the Republic of Latvia, Phone: +371 67031703, E-mail: pasts@ur.gov.lv, Homepage: https://www.ur.gov.lv/en/	The information you are requesting contains personal data from public records. At the time of receipt of this information, the recipient of the information shall be responsible, in his or her capacity as controller, for his or her further activities with personal data. You are obliged to note that personal data received may only be used to protect your legitimate interests, processed in such a way as to ensure adequate security of personal data, and not illegally disclose personal data collected in this service. Privacy policy is available here: <u>https://www.ur.gov.lv/lv/par-mums/fizisko- personu-datu-apstrade/juridisko-faktu- registracijas-procesa/</u>
Liechtenstein	Information not available	Information not available	Information not available

Lithuania	In accordance with national law the information about participants is available for 10 years and information about beneficial owners will be available for 8 years from the date of transferring of the beneficial ownership information to the Legal Entity Participants Information System (JADIS) archive.	The controller of personal data is the Ministry of Justice of the Republic of Lithuania. Contact information: Gedimino ave. 30, LT-01104, Vilnius, Lithuania Phone: +370 5 266 29 81 Fax: +370 5 262 59 40 E-mail: rastine@tm.lt <u>https://tm.lrv.lt</u>	Individuals' personal data are processed in accordance with procedures set in Regulation (EU) 2016/679 and the Law on the Legal Protection of Personal Data.
		The processor of personal data is the State Enterprise Centre of Registers.	

	[1
		The processor of personal data assists the controller of personal data to ensure the implementation of the rights of data subjects set out in Regulation (EU) 2016/679.	
		Contact information:	
		Lvovo st. 25-101, LT- 09320 Vilnius, Lithuania	
		Phone: +370 5 268 8262	
		E-mail: info@registrucentras.lt	
		https://www.registrucentras.lt	
		The national data controller is the State Data Protection Inspectorate.	
		Contact information:	
		L. Sapiegos st. 17, LT-10312 Vilnius, Lithuania	
		Phones: +370 5 271 2804 / 279 1445	
		Fax: +370 261 9494	
		E-mail: <u>ada@ada.lt</u>	
		https://vdai.lrv.lt	
Luxembourg	The information registered in the RFT (legal arrangement register) shall be kept by the <i>Fiducies</i> and Trusts Register for five years after the termination of the person's involvement in the <i>fiducie</i> or express trust.	 The user has a right of access (article 15 RGPD), rectification (article 16 RGPD) and deletion (article 17 RGPD) of the information concerning him/her, within the limits of the legal provisions requiring RFT to keep personal data. He may also object to the processing of his data under the conditions set out in Article 21 RGPD, and obtain the limitation of the processing under the conditions set out in Article 18 RGPD. Requests for rectification, deletion, limitation or opposition to the processing carried out by AED (RFT), in its capacity as data controller of the RFT, should be addressed to the AED, at the following e-mail address (blanchiment@en.etat.lu), which will forward them to the AED - Data Protection officer. 	When consulting the register, professionals have to tick a box to certify that access to the data in the Register of Trusts and Fiduciary Contracts is made within the framework of your AML/CFT supervisory mission or within the framework of your AML/CFT due diligence obligations.

	• The user may lodge complaints about the above-mentioned processing operations with the Commission Nationale pour la Protection des Données (National Commission for Data Protection), whose registered office is at 1 Avenue du Rock'n'Roll, L-4361 Esch-sur-Alzette, or with the competent supervisory authority in his or her State of residence.	
--	---	--

Malta	For the beneficial ownership information for companies and legal entities, the Companies Act (Register of Beneficial Owners) Regulations (S.L 386.19) obliges the Malta Business Register to	In the case of the beneficial ownership information for companies and legal entities is administered by the Malta Business Registry (MBR), the data controller is the Malta Business Registry Address: Malta Business Registry, AM Business Centre, Triq il- Labour, Zejtun, ZTN 2401, Malta.	For Register of Beneficial Owners for Commercial Partnerships and Legal Entities, kindly refer to our Master Privacy Policy found here: <u>https://mbr.mt/privacy-policy/</u>
	retain Personal Data relating to beneficial owners until the lapse of 5 years after the name of the concerned company or legal entity has been struck off the register. The beneficial ownership information of a trust is retained in the beneficial ownership register of trusts and accessible to the relevant parties in terms of applicable legislation until such time as the trust remains in existence. If a trust is terminated the beneficial ownership information is removed from the platform for the purposes of access to third parties in terms of	Telephone: +35622582300 E-Mail: <u>info.mbr@mbr.mt</u> Homepage: <u>https://mbr.mt</u> In the case of the BO Register of Trusts which is administered by the MFSA, the data controller is the Malta Financial Services Authority (MFSA) . Homepage: <u>https://www.mfsa.mt</u> ; Address: Malta Financial Services Authority, Triq l-Imdina, Zone 1, Central Business District, Birkirkara, CBD 1010, Malta; Email address: <u>communications@mfsa.mt</u>	In case of the BO Register of Trusts which is administered by the MFSA, there is a general statement on the main page which states as follows: "The MFSA ensures that any processing of personal data is conducted in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation), the Data Protection Act (Chapter 586 of the Laws of Malta) and any other relevant European Union and national law."

	law, however the data remains on the register for ten years after the grounds for registering the beneficial ownership information have ceased to exist.		
Netherlands	The information in the BO-register for corporate and legal entities must be kept available through this register for ten years after the corporate or legal entity has been struck off from the register. The information in the BO-register for trusts and similar legal arrangements must be kept available through this register for ten years after the grounds for registering such information have ceased to exist.	Kamer van Koophandel. KVK - Kamer van Koophandel.	The (general) privacy statement of the Kamer van Koophandel can be found here: <u>Privacy statement (kvk.nl)</u> The terms and conditions can be found here: <u>Gebruiksvoorwaarden verstrekking en</u> <u>gebruik Handelsregistergegevens (kvk.nl)</u> These terms and conditions must be accepted to gain access to information in the Trade Register (including information on BOs of corporate and legal entities). The following message is shown: Op de verstrekking en het gebruik van Handelsregistergegevens zijn de <u>Gebruiksvoorwaarden Verstrekking en</u> <u>gebruik Handelsregistergegevens</u> van

	toepassing. Met het plaatsen van de bestelling ga je hiermee akkoord.

Norway	10 years	Brønnøysundregistrene Address: Havnegata 48, 8900 Brønnøysund, Norway <u>Brreg.no</u>	Privacy statement: <u>Privacy statement - The</u> <u>Brønnøysund Register Centre (brreg.no)</u>
Poland	Information filed by corporate and other legal entities in the Central Register of Beneficial Owners (CRBO - national BO register in Poland) is available immediately after submission and will stay available for a period of 10 years after removal of the legal person from the National Court Register (public register of legal entities active in Poland) - counting from the date on which the information on such entity is removed. Information filed by trusts and other similar legal arrangements in CRBO is available immediately after submission and will stay available for a period of 10 years	The authority competent for matters related to the CRBO is the minister competent for public finance. Questions related to CRBO can be submitted via e-mail <u>crbr.help@mf.gov.pl</u> (contact details: <u>https://www.podatki.gov.pl/crbr/kontakt-crbr/</u>). In general the authority competent in matters of personal data protection is the President of the Personal Data Protection Office (can be contacted via e-mail <u>kancelaria@uodo.gov.pl</u> , contact details: <u>https://uodo.gov.pl/pl</u> <u>https://uodo.gov.pl/en/484</u>)	According to the AML Act data submitted to CRBO are publicly accessible (similarly – basic data collected by the business register in Poland, including individuals' personal data - are public). Information about rules and regulations applied are available at CRBO web site (Read more here - in Polish: https://www.gov.pl/web/finanse/centralny- rejestr-beneficjentow-rzeczywistych).

	starting from the day when the obligation to notify CRBO or update the data in CRBR ceased.		
Portugal	The recorded information is retained in Central Register of beneficial Owner (RCBE) data base as long as the entity is not extinct, and plus 10 years after that. The data about the BO is deleted 10 years after the loss of BO status. They may be kept for longer if there is an ongoing investigation or a judicial proceeding.	The president of the Board of Directors of the Institute of Registries and Notary (article 28.° Beneficial Owner Legal Regime – Law No. 89/2017, 21st of august) Name: Filomena Rosa Address: Av. D. João II, nº 1.08.01D, Edificio H, Parque das Nações, Apartado 8295 1803-001 Lisbon, Portugal e-mail address: im@im.mj.pt Phone number: 0351 217985500 https://im.justica.gov.pt/ https://justica.gov.pt/servicos/Registo-de-Beneficiario-Efetivo	PT version: A base de dados do RCBE tem por finalidade organizar e manter atualizada a informação relativa à pessoa ou às pessoas singulares que detêm, ainda que de forma indireta ou através de terceiro, a propriedade ou o controlo efetivo das entidades constantes do artigo 3.º do regime jurídico do RCBE, com vista ao reforço da transparência nas relações comerciais e ao cumprimento dos deveres em matéria de prevenção e combate ao branqueamento de capitais e ao financiamento do terrorismo estabelecidos na Lei n.º 83/2017, de 18 de agosto. Os dados pessoais recolhidos destinam-se à organização de informação sobre o beneficiário efetivo das entidades sujeitas ao regime jurídico do RCBE e são processados automaticamente nos termos da legislação aplicável ao registo do beneficiário efetivo e à proteção de dados pessoais, não podendo ser utilizados para outra finalidade. O seu tratamento é da responsabilidade da Presidente do Conselho Diretivo do Instituto dos Registos e do Notariado, I.P., que assegura o acesso à informação pelo próprio, que tem direito à correção dos dados indevidamente registados.

	party, the ownership or effective control o the entities listed in article 3 of the beneficial owner legal framework, with th purpose to enhance transparency in commercial relations and complying with the terms of preventing and combating money laundering and the financing of terrorism established in Law 83/2017, of August.
	The personal data collected are used to organize information on the beneficial owner of the entities subject to RCBE lega regime and are processed automatically, in accordance with the legislation of the beneficial owner register and personal data protection, and cannot be used for another purpose. The President of the Board of Directors is the responsible for the processing of data, and provides access to
	the information to the data subject, who ca request the rectification of the unduly registered data.

Romania	According to the provisions of art. 19 paragraph (5 ⁴) of Law no. 129/2019 for preventing and combating money laundering and terrorist financing, as well as for amending and supplementing some normative acts, with subsequent amended and supplemented, the information registered in the Register of Real Beneficiaries are available through national registers and through the system of interconnection of registers for 10 years after the legal person has been strikes off, respectively after the reasons for registering the information regarding the real beneficiary of the trusts / similar legal constructions have ceased to exist.	According to the provisions of art. 20 of Law no. 129/2019, the organization and functioning of the Registers of Real Beneficiaries are regulated by documents issued by the authorities that manage them, these being responsible for the information registered in the Registers of Real Beneficiaries and for the release of information from these registers. According to the provisions of art. 19 paragraph (5) and art. 56 paragraph (1 ¹) of Law no. 129/2019, the National Trade Register Office manages the Register of Real Beneficiaries for the legal entities that have the obligation to register in the trade register, except for autonomous utilities, companies and national companies and companies wholly or majority owned by the state. Information on the processing of personal data by the National Trade Register Office and the guide on the exercise of rights by data subjects are available on the institution's website <u>http://www.onrc.ro</u> , section Personal data or section Real Beneficiaries, subsections RBR Information / RBR Copies, <u>https://www.onrc.ro/documente/note%20de%20informare/Nota%20d</u> <u>e%20informare_6.4.pdf</u>	According to art. 19 paragraph (8) of Law no. 129/2019, the access to the Register of Real Beneficiaries is ensured in accordance with the regulations regarding the protection of personal data: a) to the authorities that have supervisory and control competences, to the judicial bodies, under the conditions of Law no. 135/2010 on the Criminal Procedure Code, as subsequently amended and supplemented, and to the Office, in due time, without any restriction and without alerting the person concerned; b) to the reporting entities when applying customer awareness measures; c) to any natural or legal person. The access to the Register of Real
			Beneficiaries is assured, in accordance with the norms regarding the protection of personal data, to the natural or legal entities entitled according to paragraph. (8) let. c) and paragraph. (8 ¹) let. c) and d), as the case may be, with the condition of online registration and of the payment of an administrative fee / tariff (s) established by the authorities provided in paragraph (5), which must not exceed the administrative costs associated with making the information available, including the costs of maintaining and developing the register. The procedure regarding the online registration and the

	amount of the fee / tariff is approved by order of the Minister of Justice or by order of the President of the National Agency for Fiscal Administration, as the case may be.
	The natural and legal persons provided in paragraph (8) have the right of access to the name and surname, month and year of birth, nationality and country of residence of the real beneficiary, as well as to the information on the nature and extent of the interest generating benefits held, in case of natural and legal persons provided in paragraph (8) let. c) it is not necessary to justify an interest in obtaining the data.
	The online registration procedure for accessing the Register of Real Beneficiaries, approved by Order of the Minister of Justice no. 7.323 / C / 2020, shall apply: - to the natural or legal persons provided
	 in art. 19 paragraph (8) letter. c) of Law no. 129/2019; to the authorities that have supervisory and control competences, to the judicial bodies provided in art. 19 paragraph (8) letter a) of Law no. 129/2019, if chooses the online access to the Register regarding the Real Beneficiaries;

			- to the reporting entities provided at art. 5 of Law no. 129/2019, when applying the customer awareness measures, if they chooses the online access to the Register of Real Beneficiaries.
			The legality of personal data processing: art. 6 paragraph (1) letter c) of the General Regulation on data protection, the processing is necessary in order to fulfill a legal obligation which belongs to the National Trade Register Office in accordance with the provisions of Law no. 129/2019 and of the Order of the Minister of Justice no. 7.323 / C / 2020 for the approval of the Procedure for online registration and approval of tariffs for accessing the Register of Real Beneficiaries kept by the National Trade Register Office
Slovakia	The beneficial ownership information is available without any time constraint.	Beneficial ownership information is made available by the Statistical Office of the Slovak Republic, which operates the national BO register. Contact details: Statistical Office of the Slovak Republic Lamačská cesta 3/C P. O. BOX 17 840 05 Bratislava 45 Slovakia	License agreement for the use of the data from the RLE 1) SO SR as an administrator of the RLE applies the Creative Commons Attribution 4.0 International Public License - cc by 4.0 (hereinafter referred to as the Public License) to the use of data made accessible from the RLE, according to Section 7, Article 2 of the Act No 272/2015 Coll. on

		https://slovak.statistics.sk	the register of legal entities, entrepreneurs and public authorities and on amending and supplementing certain acts (hereinafter referred to as Act on RLE).
Slovenia	[Corporate entities, entities with no business share and institutions, foreign trusts, foreign institutions, or similar foreign law entities shall retain the data on their beneficial owners for a period of five years from the date of termination of the beneficial owner's status hereunder. If corporate entities, entities with no business share and institutions, foreign trusts, foreign institutions, or similar foreign law entities are terminated, a court or authority managing the termination proceedings or status change of the entity without a known successor must order that the data storage on beneficial owners be provided for the period referred to in the preceding paragraph prior to the termination of the business entity. The register administrator Agency of the Republic of Slovenia for Public legal Records and Related Services (AJPES) maintains and controls the register so that: – in addition to the last status of the data on beneficial owners, all previous entries, changes of data and deletions according to the time and type of event shall also be kept;	[Agency of the Republic of Slovenia for Public Legal Records and Related Services (AJPES), rdl.info@ajpes.si, https://www.ajpes.si/?language=english]	[https://www.ajpes.si/Terms_of_use]

supervisory bodies.

Spain	The information contained in this		Since the national central register is being
_	new Register will be kept and	are still working on this.	created, we are still working on this.
	updated - by the obliged subjects		_
	of Law 10/2010 - during the life		
	of the legal persons or		
	unincorporated entities or		
	structures (or for as long as the		
	business relationship or the		
	ownership of the real estate is		
	prolonged), and will be		
	maintained for a period of 10		
	years after their extinction (or for		
	a period of 10 years after the		
	termination of the business		
	relationship, the sale of the real		
	estate or the termination of the		
	occasional transaction).		

Sweden	The information in the registry is	Bolagsverket (Swedish Companies Registration Office)	There is no specific privacy policy for our
	never deleted and it is always	SE-851 81 Sundsvall	business. We apply the rules and regulations
	available, but there are certain	Sweden	valid for the processing of data in the
	restrictions for dissolved	bolagsverket@bolagsverket.se	registry (as stated in the Register of
	companies. When it has passed		beneficial ownerships Act [2017:631] and
	five years since the company		the Register of beneficial ownerships
	was dissolved, it is not possible		ordinance [2017:667]).
	to use the electronic service to		Read more here (in Swedish):
	find the company.		http://bolagsverket.se/om/oss/verksamhet/of
			fentliga/personuppgift er-1.226