

## WEBSITE PRIVACY NOTICE

To cope with technological change, it is necessary to pay attention to privacy.

Engelwood entities (**Engelwood Asset Management, Engelwood Fund & Corporate Services and Engelwood Management & Consulting**, hereafter "ENGELWOOD", "we", "us" or "our") are committed to complying with the new European General Data Protection Regulation (GDPR) which came into force on 25 May 2018.

We control the ways your personal data are collected via our website and the purposes for which we use your personal data acting as "data controller" in the context of the GDPR.

### 1 / PERSONAL DATA WE COLLECT ABOUT YOU

When using the term "personal data", we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold.

#### Personal data that we collect automatically

Some of your information is collected automatically. Thus, when you access our website, we may automatically collect, through log files and cookies, certain information from your device, such as the IP address, the operating system of your device, the pages visited, and the requests made and the day and time of connection. This allows us to offer you a more consistent experience on the website. Please note that cookies that we use do not collect any personal data but simply ensure smooth and optimal navigation on our website.

We also use Matomo Analytics to collect and aggregate data for statistical analysis to know how you interact with our website and enhance your experience.

#### Personal data that you provide voluntarily

We collect your data such as your name, address, telephone number, e-mail address and any information in relation to your request when you contact us directly through any communication channel (e.g., when you send us an e-mail containing a comment or a feedback).

We also process your personal data in connection with your relationship with us as a candidate to a job offer. Please read our [Candidate Privacy Notice](#) to learn more.

### 2 / DATA PROCESSING PURPOSES

ENGELWOOD processes your personal data for the following purposes:

- a. Putting you in contact and/or providing you with the information or services you have requested (including sending a commercial offer or responding to a request);
- b. Collecting information allowing us to improve our site, products and services;

- c. Contacting you about various ENGELWOOD events, including product updates and customer support.

### **3 / LEGAL BASIS FOR PROCESSING**

For purposes explained in Point 2:

- a. Performance of precontractual measures (including sending a commercial offer or a response to a contact request) or legitimate interest (keeping your data in our database so we can get in touch with you later);
- b. Legitimate interest (maintaining the IT infrastructure, information systems and website; web analytics);
- c. Consent.

### **4 / DATA RECIPIENTS**

To achieve the purposes listed above, the data is transferred to third parties such as network providers acting as data processors and on instruction from ENGELWOOD.

In this case, a contract is drawn up between ENGELWOOD and the data processor in question and appropriate technical and organizational measures are put in place in accordance with Articles 28 and 32 of the GDPR.

As a general rule, no personal data is transferred outside the EU/EEA. However, when your personal data is to be transferred (including in the case of remote access) to a country outside the EU/EEA that is not subject to an adequacy decision, appropriate safeguards in accordance with Chapter V of the GDPR are put in place, such as standard contractual clauses adopted and approved by the European Commission.

### **5 / DATA RETENTION PERIOD**

Your personal data is stored only for as long as is necessary for the purpose for which we obtained them. The retention period will depend upon several factors, such as the duration of the contract concluded with you, or legal requirements imposed on us.

The log files collected during interactions with the website are destroyed after 6 months.

The personal data we collect through the contact form available on our website will not be kept for more than 3 years from the last contact with ENGELWOOD if no contact is signed between you and ENGELWOOD.

Whenever we process your personal data on the basis of your consent, you have the right to withdraw your consent at any time by contacting us as indicated below or by clicking the unsubscribe link in the email communication we send you (e.g., Engelwood events, service and product updates, etc.). Please, note that the withdrawal of your consent does not affect the lawfulness of the personal data processing based on consent prior to its withdrawal.

Upon expiry of the applicable retention period, we will securely destroy your personal data in accordance with applicable laws and regulations.

## 6 / DATA SECURITY

The personal data we collect is stored in a secure environment. Our employees are required to respect the confidentiality of your information. To ensure the security of your personal information, we use the following measures:

- SSL Protocol (Secure Sockets Layer);
- Access management;
- Backups;
- Firewall.

We are committed to maintaining a high level of confidentiality by integrating the latest technological innovations to ensure the confidentiality of your data. However, as there is no mechanism for maximum security, there is always a risk of using the Internet to transfer personal data.

## 7 / RIGHTS REGARDING YOUR PERSONAL DATA

As a natural person, you have several rights regarding your personal data including:

- **The right of access:** You can request access to the data concerning you at any time as well as a copy of the data;
- **The right to rectification:** You can request at any time that inaccurate or incomplete data be rectified;
- **The right to erasure:** You can request that your data be deleted when, for example, the data is no longer necessary for the purposes for which it was collected or processed;
- **The right to restriction of processing:** You can request that WE restrict the processing of data if, for example, you question the accuracy of the data concerning you or if you object to the processing of data concerning you;
- **The right to portability:** You have the right to have your data transferred to another data controller in a structured, commonly used and machine-readable format, if the processing is carried out by automated means or if it is based on prior consent;
- **The right to object to processing:** You can object to the processing of your data and can withdraw your consent if the processing is based on consent, for example if the data is used for commercial prospecting purposes.

You can exercise your rights by contacting the Data Protection Officer (DPO) at the one of the following address:

- **Engelwood Asset Management:** [dpo@engelwood.eu](mailto:dpo@engelwood.eu)
- **Engelwood Fund & Corporate Services:** [data.protection@engelwood.lu](mailto:data.protection@engelwood.lu)

Requests will be dealt with by the DPO and will be responded to within 1 month at the latest, starting from the moment of your identity confirmation. This time limit may be extended to an additional 2 months in case the

request is complex or in case we have received a high number of requests. The requests will be granted within the limits provided for by law, and in particular articles 15 to 23 of the GDPR.

If you are not satisfied with our response, you also have the right to lodge a complaint at any time with the competent supervisory authority of an EU member state, depending on your habitual residence (where you live most of the time), on the place where you work or on the place where you believe infringement may have happened. In Luxembourg, the competent supervisory authority is the Commission nationale pour la protection des données (CNPD).

## **8 / LINKS TO THIRD-PARTY SITES**

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates or to a number of websites that may provide useful information to our visitors. We provide you with these links only for convenience and the inclusion of a link does not involve the approval of the website concerned by ENGELWOOD. If you follow a link to one of these websites, please note that they have their own privacy policies and we do not accept any responsibility for these related policies or websites. Please check these policies before submitting personal information to these websites.

## **9 / UPDATE TO THE PRIVACY NOTICE**

We keep this Notice under regular review, and we may change, modify, add, or remove portions from the Notice at any time. We will post any modifications or changes to this Notice on our website prior to such changes taking effect.

Last updated: 10 March 2023