

## GENERAL PRIVACY NOTICE – ENGELWOOD ENTITIES

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

We offer a wide range of products and services (hereinafter referred to as "Products & Services") including, but not limited to, the following:

- Company incorporation, liquidation, transfer, regulatory services
- Administrative and financial management of companies, accounting, tax and VAT compliance, declarations, analytical management, reporting, regulatory watch, consulting
- Company domiciliation services, substance, office search
- AML/FT - KYC - Consulting and support for compliance activities (provision of services)
- Central administration (accounting)
- Directorship
- Legal assistance - Tax compliance
- Legal reporting services
- Transfer Agent (TA)
- Investment fund management
- Wealth management: supervision, advice and consolidation
- Investment opportunity analysis
- Tax and wealth strategy support
- Risk evaluation (finance)
- Structuring services
- Investment advisory

### 1 / PERSONAL DATA WE COLLECT ABOUT YOU

We may need to collect your personal information for various reasons: providing our Products & Services, professional obligations, fulfilling a contract, processing your files, your correspondence, etc.

In particular, we process the following data:

- Billing data, sales data, supplier data
- Identity, addresses, personal and business details, marital status, etc.
- Professions, diplomas, authorisations, certifications, economic categories, activities
- Bank accounts and statements
- Income, salaries, personnel numbers, time and attendance data, working hours, bonuses, commission, travel expenses, benefits in kind, etc.
- Identity cards, passports, police records (if authorised)
- Information on absences, leave and long-term sickness
- Information on wage garnishment and assignment

- HR: date, purpose, professional status, diplomas, authorisations, certifications, career simulation, professional assessment, etc.
- Photographs for identification or marketing purposes
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We may combine the information we collect from you with data obtained from other sources to supplement it in order to provide our Products & Services and personalise our interactions with you.

## **2 / DATA PROCESSING PURPOSES**

Personal data communicated by you or by ENGELWOOD employing you, or legitimately received by ENGELWOOD, by companies connected with it or by third parties, may be processed by us with a view to :

- a. Providing Products & Services
- b. Activating Products & Services
- c. Improving Products & Services
- d. Ensuring business operations and performance
- e. Managing contracts
- f. Customer service
- g. Managing the commercial relationship and update the customer file
- h. Detecting, preventing and combating fraud
- i. Drawing up statistics
- j. Managing disputes and collecting debts
- k. Pay benefits

The personal data communicated may be processed by us for direct marketing purposes (commercial actions, personalised advertising, data matching, brand awareness), in order to improve knowledge of our customers and prospects and to inform them about our activities, products and services.

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

For purposes explained in Point 2:

- a. Performance of a contract
- b. Performance of a contract, precontractual clause
- c. Legitimate interest
- d. Legal obligation; legitimate interest
- e. Performance of a contract, convention or agreement, precontractual clause
- f. Performance of a contract; legitimate interest
- g. Legitimate interest
- h. Legal obligation imposed by European or national legislation
- i. Legitimate interest
- j. Legitimate interest
- k. Performance of a contract

## **4 / DATA RECIPIENTS**

We share your personal data with your consent or if it is necessary to complete a transaction, to provide a product or service that you have requested or authorised, or to comply with legal obligations. Your personal data may be disclosed to service providers working on our behalf, acting as data processors for us and who may need access to personal data in order to provide customer service support or to help protect and secure our systems and services. In such cases, these companies must comply with our data confidentiality and security requirements and are not permitted to use the personal data we transfer to them for any other purpose. We also share your data where this is required by law, to respond to legal proceedings, to meet our obligations to the supervisory authorities, to protect our customers, to maintain the security of our Products & Services, to protect our rights or property, for the management of disputes and debt recovery, and for the payment of services. Where applicable, the companies and/or persons in contact with us to whom personal data is

communicated may be located inside or outside the European Union. In the event of data transfers to third parties located outside the European Union, we comply with the legal and regulatory provisions in force regarding such transfers and, in particular, ensures an adequate level of protection for the personal data thus transferred, on the basis of the alternative mechanisms put in place by the European Commission or other contractual provisions.

## **5 / DATA SECURITY**

The personal information we collect is kept in a secure environment.

The people working for us are trained to respect the confidentiality of your information.

To ensure the security of your personal data, we limit it to the strict minimum and use the following measures in particular:

- Access and authorisation management for authorised persons and data subjects
- Securing workstations: anti-spam, anti-virus
- Securing mobile computing and telephones
- Protection of the IT network and servers: encryption, back-ups, flow management, firewalls
- Business continuity plan
- Supervision of developments
- Protection of premises: fire detection, anti-intrusion system, surveillance cameras
- Secure exchange of information

We are committed to maintaining a high level of confidentiality by incorporating the latest technological innovations to ensure the confidentiality of your transactions.

## **6 / DATA RETENTION PERIOD**

We retain your personal data for as long as necessary to provide the Products & Services and carry out the transactions you have requested, or for other essential purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements. As these needs may vary according to the types of data in the context of different products, actual retention periods may vary considerably.

The criteria used to determine retention periods include the following:

- Necessity of conservation to provide the requested Products & Services
- Sensitivity of the data collected or entrusted
- Specific consent or agreed limitation
- Legal or contractual obligation
- Retention policy adopted by ENGELWOOD based on our legitimate interests

These retention periods can be:

- 10 years minimum for data relating to accounting, business management, AML related information, purchase and sale registers, real estate and commercial leases of ENGELWOOD
- 5 years minimum after the end of our relationship with you for the data related to the Products & Services ENGELWOOD provides to you, general company documents, provision of services, shareholder resolutions, board resolutions, minutes of meetings, articles of association, shareholder registers, internal regulations, lawyers' documents, etc.
- Up to 10 years for documents relating to human resources of ENGELWOOD, employment contracts and salaries: payslips, salaries, tax, social security, overtime, assessments, bonuses, benefits in kind, severance pay, notice periods, approvals from the relevant authorities,

decisions by employment tribunals, correspondence, redundancy payments, CCSS and ACD declarations, etc.

- 3 years for data relating to accidents at work, working conditions, labour inspectorate, health and safety committee, emergency medical care, individual treatment agreements, degree of work incapacity, social reintegration plans, workplace accommodation, CNS declarations, etc.

## **7 / RIGHTS REGARDING YOUR PERSONAL DATA**

ENGELWOOD adheres to the General Data Protection Regulation EU/2016/679 on data protection and guarantees you the following rights:

- If the processing of personal data is based on your consent, you have the right to withdraw your consent at any time.
- You can consult your personal data, have them rectified or restricted
- You have the right to object to the processing of your personal data
- You have the right to lodge a complaint with a data protection authority

If you have any questions about the confidentiality of your data, or if you have any complaints or questions about your rights, please send your dated and signed request, together with a photocopy of both sides of your identity card, to:

- 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.

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) -Tel: (+352) 26 10 60 -1 - [info@cnpd.lu](mailto:info@cnpd.lu)