

**Artificial Intelligence  
("AI")  
Notice**



Engelwood Fund & Corporate Services S.A. ("EFCS")  
Engelwood Asset Management ("EAM")  
Engelwood Holding ("EH")

"Engelwood"

– ENTIRELY PRIVATE AND CONFIDENTIAL –

# ENGELWOOD AI (ASSISTANCE) NOTICE

Effective Date: 30/07/2025

## 1 Introduction and Scope

This AI Assistance Notice explains how Engelwood Fund & Corporate Services S.A. ("EFCS"), Engelwood Asset Management ("EAM"), and ENGELWOOD HOLDING ("EH") (collectively "Engelwood," "we," "us," or "our") use artificial intelligence systems to assist in delivering professional services to our clients, investors, employees, and other stakeholders.

This notice fulfils transparency obligations under the European Union Artificial Intelligence Act and complements our Privacy Notice. By engaging with Engelwood entities or using our services, you acknowledge awareness of our AI assistance practices as described below.

## 2 AI Systems We Use

Engelwood entities deploy artificial intelligence systems as professional assistance tools in our operations, including:

**Research and Analysis Systems:** AI tools assist our professionals in market research, investment analysis, regulatory research, and information synthesis.

**Communication and Document Assistance:** AI systems help draft correspondence, reports, presentations, and other professional communications, which undergo human review and approval.

**Document Processing Systems:** AI tools assist in document review, data extraction, and administrative processing to enhance operational efficiency.

**Administrative Support Systems:** AI assists in scheduling, data management, and routine administrative functions across our entities.

## 3 How AI Assistance Works

**Human-Supervised Process:** All AI systems operate under direct human supervision. Our professionals maintain full control over AI outputs and make all final decisions regarding content, analysis, and recommendations.

**Review and Validation:** Every AI-assisted output undergoes human review, editing, and approval before being used in client services, investment decisions, or external communications. All strategic decisions and client deliverables are subject to human review and validation.

**Professional Judgment:** Final deliverables, communications, and decisions represent the professional judgment and expertise of our staff, enhanced by AI assistance tools but not replaced by them.

**Security and Confidentiality:** AI assistance is limited to authorized and secure contexts only. No sensitive, confidential, or client data is introduced into non-approved or publicly accessible AI tools.

**Quality Assurance:** We maintain quality control processes to ensure AI assistance supports rather than substitutes for professional competence and regulatory compliance.

## 4 Entity-Specific AI Applications

EFCS (Fund & Corporate Services - Specialized PFS):

- AI assists in fund administration research, regulatory compliance analysis, and administrative documentation
- All fund administration decisions and client communications remain under direct human control and supervision

- AI tools support efficiency in routine administrative processes while maintaining fiduciary standards
- Services include fund administration, corporate services, domiciliation, and UCI administration

EAM (Alternative Investment Fund Manager - AIFM):

- AI assists in investment research, market analysis, and alternative investment fund management support
- All investment decisions, portfolio management, and fund management activities remain under direct human judgment and AIFM regulatory oversight
- AI assistance supports research and analysis for alternative investment funds including real estate, private equity, private debt, and fund of funds
- All AIFM obligations and fiduciary duties to fund investors are maintained through human oversight and decision-making
- AI tools enhance analytical capabilities while ensuring compliance with AIFMD and Luxembourg regulatory requirements

EH (Holding Company):

- AI assists in basic corporate administration, communications, and document processing
- Limited AI deployment reflects the entity's non-operational holding company status
- All corporate governance and shareholder communications remain under direct human oversight

## **5 Data Protection and Privacy**

Our AI assistance practices comply with applicable data protection laws, including GDPR. Personal data processed through AI systems receives the same protection standards outlined in our dedicated Privacy Notice.

AI systems do not store or retain personal data beyond what is necessary for immediate processing tasks. All data handling follows our established privacy and security protocols.

## **6 Professional Standards and Regulatory Compliance**

**CSSF Compliance:** Our AI assistance practices comply with Luxembourg financial services regulatory requirements applicable to EFCS (Specialized PFS) and EAM (AIFM).

**AIFMD Compliance:** EAM's AI assistance practices comply with Alternative Investment Fund Managers Directive requirements and maintain all required standards for alternative investment fund management.

**GDPR and AI Act Compliance:** All AI tools used comply with applicable legal obligations, including the General Data Protection Regulation (GDPR) and the EU Artificial Intelligence Act.

**Professional Standards:** AI assistance supports but does not replace compliance with professional standards, fiduciary duties, and industry best practices.

**Client and Investor Protection:** AI assistance practices are designed to enhance rather than compromise client protection, investor protection, service quality, and regulatory compliance.

## **7 Transparency and Accountability**

**Human Accountability:** Engelwood professionals remain fully accountable for all decisions, recommendations, and communications, whether AI-assisted or not.

**AI Usage Disclosure:** We disclose the use of AI tools when they significantly influence a deliverable or service provision to ensure transparency with clients and stakeholders.

**Investment Decision Accountability:** All investment decisions for alternative investment funds managed by EAM remain under direct human judgment and AIFM regulatory oversight.

**Third-Party Sharing Controls:** AI-generated results are integrated into our services only after validation by Engelwood. Such results are not transmitted to third parties without appropriate controls and oversight.

**Quality Standards:** We maintain the same professional quality standards for AI-assisted work as for traditional work methods.

**Continuous Monitoring:** We regularly review and update our AI assistance practices to ensure they support our professional obligations and service quality.

## **8 Governance and Internal Controls**

**Internal AI Registry:** Engelwood maintains an internal registry of AI usage across all entities to ensure appropriate oversight and compliance monitoring.

**Regular Verification:** We conduct regular verification and assessment of AI tools used to ensure they meet our security, compliance, and quality standards.

**Staff Training:** Our personnel receive training on AI risks, ethical considerations, and best practices to ensure responsible and effective use of AI assistance tools.

**Compliance Officer:** We have designated internal personnel responsible for ensuring compliance with applicable AI regulations and maintaining adherence to this policy.

**Bias Prevention:** We implement measures to prevent algorithmic bias, respect fundamental rights, and prohibit any abusive or discriminatory use of AI systems.

## **9 Your Rights and Choices**

**Information Rights:** You may request additional information about AI assistance in specific services or communications.

**Alternative Service Delivery:** Where practicable, we can provide services without AI assistance upon request, though this may affect efficiency and cost.

**Investment Disclosure:** Fund investors may request specific information about AI assistance in investment research and analysis supporting fund management decisions.

**Questions and Concerns:** We welcome questions about our AI assistance practices and their application to your specific circumstances.

## **10 Updates and Changes**

**Regular Review:** This AI Assistance Notice is reviewed at least annually and updated as necessary to reflect changes in our AI assistance practices, regulatory requirements, technological developments, or organizational changes.

**Communication:** Any updates to this notice are communicated to relevant personnel, contractors, and stakeholders. Updates will be posted on our website with the revised effective date.

**Acceptance:** Continued engagement with Engelwood entities after notice updates indicates acceptance of revised AI assistance practices.

## 11 Contact Information

For questions about this AI Assistance Notice or our AI assistance practices:

AI Inquiries:

- EFCS:\* ai@engelwood.lu
- EAM:\* ai@engelwood.eu
- EH\* ai@engelwoodgroup.com

Data Protection Officer:

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This AI Assistance Notice is designed to provide transparency about our professional practices while maintaining the confidentiality and quality standards our clients, investors and employees expect from Engelwood entities.