

Privacy notice

The protection of your personal data is important to the GLOBAL MANAGEMENT & SERVICES GROUP* (GMS GROUP).

This Privacy notice is directed to the clients, direct relationships and services providers of GMS GROUP as well as the persons who the contact details are provided by one of our clients, for example a family member, a legal representative, an ultimate beneficial owner, a company shareholder or a representative of a legal entity.

This Privacy notice provides you with detailed information relating the protection of your personal data by GMS GROUP, 32 avenue Monterey L-2163 Luxembourg.

Which personal data do we use about you?

We collect and use your personal data to the extent necessary in the framework of our activities and to achieve a high standard of personalised services.

We may collect various types of personal data about you, including:

- personal identification data (e.g. name, postal address, phone number);
- official identification data (e.g. ID card and passport number, tax ID);
- personal details (e.g. place and date of birth, gender, marital status, nationality);
- electronic identification data (e.g. e-mail address, IP address);
- banking and financial data (e.g. income, assets, declared investor profile, professional activity);
- education, training and qualification data (e.g. level of education, professional qualification);

As a general rule, we do not collect personal data related to your racial or ethnic origins, political opinions, religious or philosophical beliefs, trade union membership, genetic data or data concerning your sex life or sexual orientation.

We only process data relating to criminal convictions and offences if required through a legal obligation.

Why and on which basis do we use your personal data?

1. To comply with our legal and regulatory obligations

We use your personal data to comply with various legal and regulatory obligations, including:

- prevention of money-laundering and financing of terrorism;
- regulatory obligations for professional accountants;
- reply to an official request from a duly authorised public or judicial authority.

2. To perform a contract with you

We use your personal data to enter into and perform our contracts with you, including to:

- manage our services;
- manage our relationship with you;
- provide you with information regarding our services;
- assist you and answer your requests.

3. To pursue our legitimate interests

We use your personal data in order to deploy and develop our services, to improve our risk management and to defend our legal rights, and as well to:

- keep proof of transactions;
- prevent personal injury and damage to goods;
- ensure the security of persons and property;
- perform IT management.

4. To respect your choice if we request your consent for specific processing

Who do we share your personal data with?

In order to fulfil aforementioned purposes, we communicate your personal data to:

- service providers that perform services on our behalf;
- banks and financial institutions;
- supervisory, financial, taxation, administrative or judicial authorities, state agencies or public bodies, upon request and to the extent permitted by law;
- certain regulated professionals such as lawyers, notaries or auditors.

For how long do we keep your personal data?

We will retain your personal data for as long as it is necessary for the purpose for which it was intended, for the purpose of rendering or fulfilling the service requested by you and for as long as required or permitted by law.

What are your rights and how can you exercise them?

In accordance with applicable regulations, you have the following rights to:

- access: you can obtain information relating to the processing of your personal data, and a copy of such personal data;
- rectify: where you consider that your personal data is inaccurate or incomplete, you can require that such personal data be modified accordingly;
- erase: you can require the deletion of your personal data, to the extent permitted by law;
- restrict: you can request the restriction of the processing of your personal data;

- object: you can object to the processing of your personal data, on grounds relating to your particular situation;
- withdraw your consent: where you have given your consent for the processing of your personal data, you have the right to withdraw your consent at any time;
- data portability: where legally applicable, you have the right to have the personal data you have provided to us be returned to you or, where technically feasible, transferred to a third party.

If you have any questions regarding our Privacy notice or if you wish to exercise the rights listed above, please send a letter to GMS GROUP, 32 avenue Monterey L-2163 Luxembourg, or an e-mail to privacy@gms.plus.

In addition to your rights above, you are also entitled to lodge a complaint with the competent supervisory authority: the “ Commission national pour le protection des données” (cnpd.lu).

* By GMS GROUP we mean FIDEPAR S.A. and all related companies, including, among others, Global Management & Services S.A., Yes Europe Sàrl, Global Corporate Advisors Sàrl and Patrimonia Family Office Sàrl.