

## Privacy Notice

### Protecting Your Privacy Eric Sturdza Management Company S.A.

#### Who We Are

Eric Sturdza Management Company S.A. (ESMC) ('we' or 'us' or 'our') is a Luxembourg Management Company authorized under the Chapter 15 of the Law of 17 December 2010 relating to undertakings for collective investment (the "2010 Law") managing undertakings for collective investment subject to Part I of the 2010 Law. ESMC will gather and process your personal information in accordance with this Privacy Notice and in compliance with the Luxembourg Law of 2 August 2002 on the protection of persons with regard to the processing of personal data (Data Protection Law), as amended and the General Data Protection Regulation (GDPR) coming into force on the 25th of May 2018. This Privacy Notice provides you with the necessary information regarding your rights and obligations, and explains how and when we collect and process your personal data.

Our registered office is at 16 rue Robert Stumper, L-2557, Luxembourg, Grand Duchy of Luxembourg and registered with the Registre de Commerce et des Sociétés, Luxembourg, under number B200727. We have appointed a Responsible Officer who is responsible for overseeing questions in relation to this Privacy Notice. The Responsible Officer is **Julien Lambert**. Any questions in relation to this Privacy Notice or requests in respect of personal data should be directed to [data.privacy@ericsturdza.lu](mailto:data.privacy@ericsturdza.lu) in the first instance.

#### Information That We Collect

To provide its services, ESMC needs to collect and process certain information about you. The data we collect depends on the context of your interactions with the Company, the choices you make including the services which are provided to you.

It is to be noted that you have choices about the data we collect. When you are asked to provide personal data, you may decline. If you choose not to provide data that is necessary to provide the service, we may not be able to deliver the service.

#### The Data We Hold

The data we collect and process can include the following, but is not limited to:

- Identification data: we collect data about you such as your first and last name, email address, postal address, phone number, and other similar contact data, date and place of birth, gender, country, and preferred language;
- Electronic identification data: we use Cookies to collect data on how you use our website and view our marketing emails. This may include, for example, information on which ESMC's website pages you have visited, how long you stayed on them,

which items you clicked on and on your IP-address;

- Business contact information: we collect data about you such as job function, job title, department, organization name, size and location, and whether or not you are acting on behalf of a client;
- Financial information: we collect your financial information, such as financial account information, if needed to take payment or fulfil contractual obligations or for related purposes;
- Contractual information: any information provided by the data subject allowing to ESMC to perform its contractual duties.

Further to the categories of data mentioned above, ESMC guarantees that, except to the limited extent that may be necessary in the context of employment and in the context of performing a contract with a client, or comply with legal obligations, we neither request nor collect special categories of data (i.e. personal information specifying criminal offences/convictions, medical or health conditions, biometric or genetic data, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information specifying the sex life of the individual)

### How We Use Your Personal Data

This Privacy Notice applies to personal data, which is information that ESMC collects from you and other third parties that specifically identifies you as an individual. ESMC may collect your personal data in various manners.

### Ways of collecting data

- Information that we automatically collect when you use our Website: when you use our Website, we automatically collect, through Cookies, the following information:
  - Navigation and click-stream data;
  - HTTP protocol elements;
  - Search terms.
- Personal data that we collect when you do business with ESMC: we may collect and process your data when you conduct business with us. "Personal data" means information relating to an identified or identifiable natural person that ESMC receives on behalf of the data subjects. Examples of categories of such personal data can be found in the previous section.
- Personal data we obtain from other sources: we also may periodically obtain both personal and non-personal information about you from ESMC's affiliates, business partners or other third-party sources (as our TA/FA, Bank depositary) where they are legally permitted to share such information with us, and add it to the information we already hold about you, such as, but not limited to:
  - Updated business address information;
  - Identification data;
  - Financial information;
  - Contractual information.

- Personal data that we collect when you apply online for employment: please refer to the HR section.

### Purposes for collection, use and processing of data

For processing to be lawful under the GDPR, a lawful basis needs to be identified before processing personal data. We use or may use your personal data for the following purposes (or as otherwise described at the point of collection) in line with the lawful basis under the GDPR:

- To provide you with the service you have requested;
  - Processing is necessary for the performance of a contract.
- To provide you with information, access to resources or other services that you have requested from us on behalf of your organisation;
  - Processing is necessary for the performance of a contract.
- To send you client service-related communications (marketing);
  - Processing is necessary for the purposes of the legitimate interests pursued by the controller.
- To deal with communications that you send to ESMC and responding to your queries, requests and complaints;
  - Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
  - Processing is necessary for compliance with a legal obligation.
- To fulfil our legal obligations namely in respect to AML/CTF (including Know Your Customer and Market Abuse Regulation);
- Processing is necessary for compliance with a legal obligation.
- To manage the infrastructure and business operations of ESMC and to comply with internal policies and procedures;
  - Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party.
- To comply with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities.
  - Processing is necessary for compliance with a legal obligation.

We may contact you by mail, telephone, fax, video conference, email or other electronic messaging service to notify you about special events, new features or other information that may be of interest to you in accordance with your interaction with ESMC. Where required by applicable law, your prior consent will be obtained before sending you direct marketing and you may object or opt out of receiving marketing messages from ESMC.

ESMC does not in any way sell, lease or rent your information to third parties.

### How We Use Your Personal Data

ESMC takes your privacy very seriously and will never disclose or share your data without your consent; unless required to do so by law. Under no circumstances will we ever sell your data. We only retain your data for so long as is necessary for the purpose(s) specified in this Privacy Notice. Where you have consented to us providing you with marketing materials, you are free to withdraw this consent at any time. **The purposes and reasons for processing your personal data are detailed below:**

Purpose	Lawful Basis for Processing
To enter into client relationships	Any one or more of the following: The legitimate interest of Eric Sturdza Management Company S.A. as a provider of Management Company services to process personal data in the performance of its contractual obligations. In instances where an individual has been provided with this Privacy Notice and provides personal data thereafter, the processing may be carried out on the basis of consent. Consent may be withdrawn at any time in writing by contacting <a href="mailto:data.privacy@ericsturdza.lu">data.privacy@ericsturdza.lu</a> .
To manage our client and other business relationships	The legitimate interests of Eric Sturdza Management Company S.A. to seek to ensure its business is conducted efficiently and with a view to enhancing its services.
To ensure the security of our systems, staff and premises	The legitimate interests of Eric Sturdza Management Company S.A. in protecting its systems, staff and premises from being misused or the victim of any criminal activity
To provide our contacts with marketing material and to invite contacts to events which may be of interest to them and to manage such mailings and events	The legitimate interests of Eric Sturdza Management Company S.A. as a provider of Management Company services to process personal data to communicate with individuals on topics and events which may be of interest to those individuals.  The rights of those individuals to unsubscribe from mailings will be detailed within all mailings and any requests to unsubscribe may be made via links available in those mailings or by emailing <a href="mailto:data.privacy@ericsturdza.lu">data.privacy@ericsturdza.lu</a> .
To meet all legal and regulatory obligations applicable to Eric Sturdza Management Company S.A.	The legitimate interests of Eric Sturdza Management Company S.A. as a provider of Management Company services to process data to the extent necessary to ensure it meets all legal contractual, legal and regulatory obligations incumbent on it.

## Your Rights

Data subjects in the European Union (or any jurisdiction with equivalent legislation to the European Union General Data Protection Regulation) have certain rights in respect of their personal data.

Any such data subject wishing to exercise their rights under applicable data protection laws (including the right to withdraw any consent to processing previously given; the right of access to data, or to have data corrected, updated, rectified or erased; or for access to data to be restricted or provided to any third party; or to object to any particular processing) should send the request in the first instance to [data.privacy@ericsturdza.lu](mailto:data.privacy@ericsturdza.lu).

In the case in which a data subject chooses not to provide any personal data or where any of the rights set out above are exercised to limit the processing of personal data, we may be unable to provide relevant services, or there may be a restriction on the services that can be provided.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

These include:

- Right to access your personal information: should you want to review the data we hold, collect and process about you, please let us know by contacting us to the contact information [data.privacy@ericsturdza.lu](mailto:data.privacy@ericsturdza.lu).
- Right to rectification: should the data we hold, collect and process about you be inaccurate or incomplete, you have the right to update such data at any time by contacting us to the contact [data.privacy@ericsturdza.lu](mailto:data.privacy@ericsturdza.lu).
- Right to erasure: if at any time you decide you do not want us to retain any personal data we collected from you, you may request we delete your data by contacting us to the contact information [data.privacy@ericsturdza.lu](mailto:data.privacy@ericsturdza.lu). We will take reasonable measures to comply with your request in accordance with applicable laws.
- Right to restriction of processing: should you wish to exercise this right, please contact us to the contact information [data.privacy@ericsturdza.lu](mailto:data.privacy@ericsturdza.lu). You should obtain the right to restriction of processing only where in accordance with applicable laws.
- Right to object: should you wish to exercise this right, please contact us to the contact information [data.privacy@ericsturdza.lu](mailto:data.privacy@ericsturdza.lu). We will consider your objection and we will comply with it unless we have a compelling legitimate ground as permitted by applicable law.
- Right to data portability: you may have the right to have your personal data transmitted directly from us to another controller only when you have asked us to do so and have consented to such sharing, and when technically feasible. Should you wish to exercise this right, please contact us to the contact information [data.privacy@ericsturdza.lu](mailto:data.privacy@ericsturdza.lu).
- Right to lodge a complaint with the supervisory authority: where you believe that your data is being processed in a way that does not comply with the GDPR, you have the right to lodge a complaint with the respective authority as follows: Luxembourg - Commission Nationale pour la Protection des Données (the "CNPD").

Please be aware that these rights are not always absolute and there may be some situations in which, technically or legally, ESMC may not be able to comply with your request.

### Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this Privacy Notice or where there is a legal requirement to do so. Eric Sturdza Management Company S.A. uses third-party/third-parties to provide certain business functions; however all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this Privacy Notice, the data protection laws and any other appropriate confidentiality and security measures as may be appropriate. The third parties with which we may share or disclose your personal data include the following:

- Any sub-contractors, agents or service providers of Eric Sturdza Management Company S.A.;
- Third parties with whom Eric Sturdza Management Company S.A. engages for hosting events or other marketing initiatives;
- Regulators or other governmental or supervisory bodies with a legal right to the material.

### Safeguarding Measures

Eric Sturdza Management Company S.A. takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorized access, alteration, disclosure or destruction and have several layers of security measures in place, including:

- Restricted access
- IT authentication
- Firewalls
- Anti-virus/malware Essentials Plus Certification

### Transfer Outside the EU

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) starting with 25th of May 2018. Some countries may not necessarily have the same high standard of protection of your personal data.

As those recipients may be located in and outside the European Union, e.g. Guernsey (the Channel Islands) or Switzerland. Your personal data will not be transferred to any country outside the European Union which does not ensure an adequate level of protection unless you gave us prior authorization to do so or specific measures (such as adequate contractual arrangements, Standard contractual clauses) have been taken by us in order to ensure that the requirements of the applicable data protection law have been fulfilled.

Where personal data is transferred/disclosed to ESMC's affiliates/branches/subsidiaries, if any, such transfer is based on specific measures, specifically the model clauses issued by the European Commission with regards to transfer of personal data outside the European Union. Should you wish to consult the latter, please let us know by contacting us to the contact information provided in the section "HOW TO CONTACT US" of this policy.

### Consequences of Not Providing Your Data

You are not obligated to provide your personal information to Eric Sturdza Management Company S.A., however as this information is required for us to provide you our services, we will not be able to offer our services without it.



### What we expect from you

We expect you to inform us in writing and without undue delay of changes in the information you provided to us or others about you, so that we can keep it up-to-date.

If you provide us with personal information not relating to you (e.g. information about your respective representatives, staff members and agents, beneficial owners, shareholders, etc. or about any third party), you must first inform them about this fact and make sure they acknowledge that we can use such information as set out in this Privacy Notice. In particular, you must provide them with the information relating to their rights as data subjects. We assume that these third parties are informed of the processing of any personal information relating to them that we may carry out and of the disclosure of the same to third parties and countries as described herein and that, as far as necessary, you obtained these data subjects' prior written consent

### How Long We Keep Your Data

Eric Sturdza Management Company S.A. only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. Eric Sturdza Management Company S.A. policy is to retain data for 5 years from the conclusion of the relationship after which time it will be destroyed. This is subject to certain exceptions (where in each case, records may be kept indefinitely) or in instances where the personal data is relevant to a dispute after closure of a matter or where the data cannot be deleted for other reasons.

Any requests for further information in relation to the continued processing of specific data, and requests for destruction of data, should be made to [data.privacy@ericsturdza.lu](mailto:data.privacy@ericsturdza.lu).

### Marketing

Occasionally, Eric Sturdza Management Company S.A. would like to contact you and provide you with factsheets, monthly commentaries, weekly reports or themed articles that we provide or periodic/adhoc updates regarding our funds and business. If you consent to us using your contact details for these purposes, you have the right to withdraw your consent at any time by using the unsubscribe options or by contacting [data.privacy@ericsturdza.lu](mailto:data.privacy@ericsturdza.lu) directly.

### Human Ressources and Job Application

Personal data that we collect when you apply online for employment: you may submit personal data through the use of our website to be considered for employment at ESMC. Such information includes, amongst others, your name, your address, your phone number, your email address, experience, education, job skills and other information contained on your curriculum vitae (CV) and/or your cover letter. ESMC uses such data solely for consideration of your candidacy for employment, to communicate with you and to generate related correspondence, including offer letters and employment agreements. Such data may also be used, subject to applicable local laws, to conduct necessary background checks for compliance and other employment related purposes (including the assessment of your profile in view of the conclusion of a potential employment contract, to the extent permitted by applicable laws and regulations). Finally, ESMC only retains such data for as long as is necessary to address your employment application and any questions



that may arise regarding your application's processing. Your submission of personal data or a resume through our website constitutes your consent to the collection, storage and use of that information by ESMC during the recruitment process.

We may disclose/transfer your data to other companies under common ownership or control as ESMC who will process your information in a manner consistent with this Privacy Notice.

### Telephone Recordings

The telephone calls and electronic communications that you make to and receive from us may also be recorded, maintained, stored and used by us in connection with record keeping, dispute resolution, security and/or for training purposes.

### Changes to this Privacy Notice

We will keep this Privacy Notice under review and any updates will appear on our website at [www.ericsturdza.lu](http://www.ericsturdza.lu).

### How to contact us

If you have any questions about this Privacy Notice or any data which we hold about you, please contact: [data.privacy@ericsturdza.lu](mailto:data.privacy@ericsturdza.lu) or write to us:

Eric Sturdza Management Company S.A.

Attention: Data Protection Officer

16 rue Robert Stümper

L-2557 Luxembourg

Grand Duchy of Luxembourg