

Personal data protection policy

To further strengthen the protection of personal data, a new European regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, (GDPR - General Data Protection Regulation) entered into force on 25 May 2018.

GADD & Cie S.A. (hereinafter GADD) takes the protection of your data very seriously.

GADD will only use your personal data to deliver the investment services you have requested from us and to meet the legal requirements.

GADD processes the information and personal data relating to you and / or any related person of yours (related person(s) and you, together the hereinafter "Person(s) concerned"). Specifically, we perform this processing in the context of existing business relationships and / or relationships with potential customers, including your use of our website (hereinafter collectively the "Business Relationship »).

- A "Related Person" is a person or entity whose information you or a third party provides to us and / or otherwise comes to our knowledge in connection with our Business Relationship. A Related Person may be - (i) any director, officer or employee of a company, (ii) the trustee, settlor or protector of a trust, (iii) any nominee or beneficial owner of an account, (iv) the holder of substantial interests in an account, (v) the controlling person, (vi) the beneficiary of a designated payment or (vii) any representative or agent (eg, person with power of attorney or right of information on an account).

What are the objectives pursued by this regulation?

- ✓ Guarantee the transparency of your personal data held by GADD
- ✓ Allow a control of your personal data at any time
- ✓ Check the delay to keep and the processing purposes of your data in possession of GADD
- ✓ Guarantee the updating of your data and their destruction as soon as these data are no longer necessary or used
- ✓ Guarantee that no data is transmitted to third parties without your consent
- ✓ Strengthen the confidentiality of data and avoid disclosure (with the exception of those necessary for the proper performance of the mandate concluded in the context of the business relationship)

In the context of its activities and within the legal and / or contractual restrictions, GADD may store, use and process personal data relating to prospects or potential customers having an interest in GADD's services.

What personal data do we collect and process?

GADD may have to deal with different categories of personal data of its customers according to the purpose of the services offered.

These include:

- ✓ identification data such as name, first name (s), address, phone number, electronic address,
- ✓ personal characteristics such as date of birth, country of birth, nationality (ies), status and marital status,
- ✓ identifiers such as identity card, passport, driving license, tax identification number, social security number,
- ✓ data on the level of study, professional data present or past,
- ✓ financial situation data,
- ✓ data relating to the client's financial knowledge and experience,
- ✓ data on objectives pursued, investment preferences, amounts invested, number of transactions,
- ✓ data relating to phone records.

What are the purposes of collecting and processing this data?

Essentially, we process this data to meet our legal and regulatory obligations and to better serve our clients.

They are useful for the execution of the contract between GADD and its customers, to understand the needs of customers and how to meet them, for the prevention of money laundering and financing of terrorism as well as fraud, permanent improvement customer service, enable reporting and cooperation with the relevant authorities.

It should be noted that failure to provide such information by the clients may prevent us from pursuing a business relationship or providing a service to our clients.

Can we share your personal data with third parties?

GADD does not sell or share your personal data to third parties, including for marketing purposes. GADD staff members who have access to this personal data have a duty of confidentiality and must comply with GADD's Code of Conduct and legal requirements.

GADD may transmit personal data only in the event that the law or regulations require it or as part of an agreement with providers.

In this case, only the necessary personal data would be communicated so that they can carry out their mission or provide their services.

How long are your data kept?

GADD will keep this data for the duration of the business relationship and for additional periods after the end of the business relationship, in accordance with applicable law.

What are your rights in the processing of your personal data?

You have the following rights:

- ✓ Access to your personal data and request a copy,
- ✓ Right to rectification or erasure of inaccurate personal data or where their processing is no longer necessary,
- ✓ Right to limit treatment
- ✓ Right to oppose the treatment at any time based on reasons relating to your own situation
- ✓ Right to lodge a complaint with a supervisory authority or the 'data protection officer' at the following email address: info@gadd.lu