



## DATA PROTECTION INFORMATION

The protection of your privacy is a special concern to us, which is why we commit to protecting your personal data at all times. Below you will find useful information regarding the processing of your personal data by Moventum Asset Management S.A. ("MAM") and your rights.

### 1. WHO ACTS AS DATA CONTROLLER AND WHO IS MY CONTACT PERSON ?

MAM is responsible for the data and you can contact us using the agreed communication channels.

**Moventum Asset Management S.A.**

12, rue Eugène Ruppert | L-2453 Luxembourg

Tel.: +352 26 154 400

**Data Protection Officer:**

E-mail: [dpo@moventum-am.lu](mailto:dpo@moventum-am.lu)

### 2. WHAT DATA SOURCES AND DATA DO WE USE ?

We process the data we receive through our account relationship with you. We receive the data either directly from you, such as when you close a contract with MAM or indirectly pursuant to the applicable laws and regulations of public registers or third-party sources. The information we process about you includes, but is not limited to, personal information such as name, identification number, date of birth, KYC records, physical address and e-mail address, telephone number, financial information, including proof of payment and transaction records and information relating to your assets, liabilities, income and investments (including investment objectives), proof of eligibility, signatures or other unique identifiers (e. g. authentication data), professional information about you (e.g. occupation, title, employer and work experience), your knowledge/experience and risk appetite/awareness in the field of investments, data received in the context of the products and services you use, tax-relevant data, communication (e.g. correspondence with you), advertising and sales data (e.g. products that may be of interest to you).

### 3. FOR WHAT PURPOSES AND ON WHAT LEGAL BASIS DO WE PROCESS YOUR DATA ?

#### 3.1. FOR THE FULFILMENT OF CONTRACTUAL OBLIGATIONS

We process your data for the purpose of fulfilling our contracts with you, such as in relation to asset management and, if applicable, in relation to other investment services. The specific purposes of data processing are determined by the respective product and underlying contract.

### **3.2. FOR PURPOSES IN OUR LEGITIMATE INTEREST**

We may also collect your data on the basis of a number of interests in order to pursue our own interests or the legitimate interests of third parties.

This is done for the following purposes:

- client consultation and for sales;
- generally managing and developing our services, systems and products;
- meeting the internal requirements of MAM, including risk management, auditing and administrative purposes, with the aim of ensuring the appropriate and responsible corporate governance of MAM;
- advertising and market research;
- ensuring the safety and continuity of our services (incl. IT services);
- asserting, enforcing or defending legal claims;
- preventing or investigating criminal offences and for risk management and fraud prevention purposes;

Our interest in the corresponding processing of data is based on these respective purposes and is otherwise of a business nature. To the extent possible with regard to a specific purpose, we use pseudonymization and anonymization when processing your data.

### **3.3. WITH YOUR CONSENT**

To a limited extent, your data may be processed with your consent, which we will obtain as necessary.

Examples can include your consent to marketing, or your express consent in the case of certain categories of personal data.

You have the right to revoke your consent at any time, subject to applicable laws and regulations.

### **3.4. FOR THE PURPOSE OF FULFILLING A LEGAL REQUIREMENT**

We are subject to various laws (e. g. financial sector laws, anti-money laundering laws, tax laws) and regulatory requirements. The data processed to ensure that MAM complies with legal and regulatory requirements includes, among other things, verification of your age and credentials, your measures to combat fraud and money laundering, your accounting, risk assessment and your risk management (incl. creating a risk profile for you by verifying your investment experience/knowledge and risk appetite/awareness), your investments, identifying investment preferences, meeting the requirements and specifications of domestic and foreign supervisory and law enforcement authorities and the compliance with tax controls and reporting obligations on your part.

## **4. WHO PROCESSES YOUR DATA?**

Within MAM, your data will be processed only by certain departments in order to fulfil our contractual or legal obligations or the respective tasks of the departments (e.g. business operations, compliance, sales and marketing). In addition, the following units can obtain your data:

- data processors appointed by us (e.g. service providers), especially in the area of IT services and printing services, which process your data as per our instructions;
- public authorities and institutions (e.g. CNPD, CSSF) in the case of a legal or regulatory obligation;
- the shareholders, stakeholders, employees, advisors, authorised representatives, financial intermediaries, auditors and service providers of MAM;
- entities acting on your behalf or having a business relationship with you, including payees, beneficiaries, authorised agents, intermediaries, clearing houses, clearing and settlement

systems, companies/funds whose securities/financial instruments you hold (if you hold these securities via MAM), etc.;

- specialised companies, such as the Society for Worldwide Interbank Financial Telecommunication (SWIFT) and clearing houses, which process personal data relating to financial transactions and which can use data processing centres located within the European Union or abroad (particularly in the United States) for this purpose;

## **5. HOW LONG DO WE RETAIN YOUR DATA ?**

If necessary, we will retain your data for the duration of our business relationship, including the creation and signature of a contract. In addition, upon termination of our relationship, we may process your data for business purposes in accordance with applicable laws and in accordance with various retention and documentation obligations introduced by MiFID II and anti-money laundering laws, etc. The retention periods specified under these laws are between five and ten years. Ultimately, retention periods are also determined by the legal periods, which – according to the Civil or Commercial Code, for example – are three years or in some cases even thirty years.

## **6. IS DATA TRANSMITTED TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS ?**

We transmit your data to countries outside the European Economic Area (EEA) only to the extent necessary for executing your orders (e.g. securities orders), for fulfilling a legal obligation if you have given us your permission to do so or if our service providers are located abroad (in the latter case, appropriate manual security measures are put in place to ensure the protection of your data).

## **7. WHAT OTHER DATA PROTECTION RIGHTS DO YOU HAVE ?**

Under certain legal conditions, you have the right to access your data and to object to the processing of your data. You also have the right to file a complaint with a data protection authority.

## **8. TO WHAT EXTENT DO WE MAKE USE OF AUTOMATED DECISIONS ON A CASE BY CASE BASIS ?**

Under certain circumstances, MAM may process your personal data using an automated decision-making process on a case by case basis. If we use such a processing method in a particular situation, we will notify you separately if we are required to do so by law. In certain circumstances, you may demand omission from automated decisions, including profiling.

## **9. WHEN DO YOU HAVE THE RIGHT TO OBJECT TO PROCESSING ?**

### **9.1. THE RIGHT TO OBJECT IN YOUR SPECIFIC SITUATION**

You have the right to object at any time to the processing of your personal data for compelling and legally valid reasons in relation to your specific situation, except in cases where legal provisions expressly provide for such processing.

### **9.2. THE RIGHT TO OBJECT IF YOUR DATA IS PROCESSED FOR DIRECT MARKETING PURPOSES**

We may process your data for direct marketing purposes within the limits set by law. You have the right to object to the processing of your data for such marketing purposes at any time. If you object to such processing, your personal data will no longer be processed for such purposes. Your right to object is not bound by any formalities. Please refer to the “About MAM” section for our contact details. If you want to know more about how MAM processes data, please contact your financial advisor/broker.