

## PERSONAL DATA PROTECTION POLICY

This Policy is intended for you as a data subject concerned by the Personal Data processed by DNCA Finance and its subsidiaries ("DNCA"). It explains why DNCA needs to collect your Data, how it will be used and protected, how long it will be kept and the rights you can exercise.

This information is hereinafter **referred to as "Personal Data" or "Data"**.

DNCA collects and processes information that identifies you and may concern your private life or your working life (e.g. your name, date of birth, family status, profession, income and outgoings, etc.).

DNCA considers Data protection to be key to building a relationship of trust with its clients. DNCA permanently ensures it complies with Data protection regulations<sup>1</sup> and endeavors to maintain responsible governance of its computer files, as well as complete transparency with respect to its Data processing.

DNCA has appointed a **Data Protection Officer (DPO)**. The DPO ensures that Personal Data processing undertaken by DNCA complies with the applicable regulations.

### Whose Data is collected?

Yours, together with that of your legal representatives, attorneys and contact persons, if applicable.

### For what purpose is your Data collected and used?

#### 1. Pre-contractual measures and/or contract performance

We process your Data in order to provide you with products and services. Processing is required as a pre-contractual measure following your application and/or for contract performance, such as:

- Subscribing to a product or service;
- Managing and providing a product or service;
- Managing claims and disputes;

Without this Data, DNCA would be unable to agree to or perform the contract.

#### 2. Meeting our legal and regulatory obligations

We are subjected to a number of legal, regulatory and administrative obligations and we process Personal Data to meet these obligations, such as:

- Knowledge of our clients;
- Measures to combat money-laundering and the financing of terrorism;
- The prevention of fraud;
- Recording telephone calls for traceability;

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<sup>1</sup> \* *the General Data Protection Regulation (GDPR) of April 27, 2016, and the French Data Protection law 78-17 of 6 January 1978 amended*

### 3. The legitimate interest of DNCA in processing Data

The legitimate interests pursued by DNCA are wide-ranging and include:

- Improved knowledge of our clients;
- Improved products and services;
- Improved management and risk prevention.

This processing is performed taking your interests and basic rights into account. As such, it includes measures and guarantees that ensure your interests and rights are protected and weighed against the legitimate interests pursued by DNCA.

These legitimate interests may be such that justify the processing of your Data, such as:

- Proposing tailored, customized services:
  - o in the context of developments in technology;
  - o by improving your Client experience;
- Risk management and the prevention of fraud;
- The security of the computer network and information.

### 4. Purposes subject to your consent

DNCA will subject certain Data processing to obtaining your consent, such as:

- Sending newsletters or customized information;
- Transferring your Data to third-party partners.

In this regard, you will be asked to specifically consent to your Data being collected and processed for explicit purposes.

### [What Data do we collect? And where does it come from?](#)

We collect Data directly from you, or via Investment Advisors, which is strictly necessary to identify and contact you, together with Data concerning your family status, professional activity, economic situation and financial and banking Data or Data regarding your transactions. This may be collected during meetings with an advisor, or via paper or electronic forms.

It is also collected via the establishments in which you have opened accounts.

On the document accompanying the Data collection, you are informed that declarations are mandatory and that in certain cases, failing to reply to a request for information may affect the processing of your application.

We may also need to gather public Personal Data concerning you.

In certain cases, we may also have collected Personal Data concerning you even though we have not entered into direct contact. This may happen if your contact details are sent to us by one of our clients, if, for example, you are a member of the client's family or a legal representative (holding powers of attorney).

### [Who has access to your Data?](#)

DNCA takes all the necessary measures to guarantee professional secrecy, together with the security and confidentiality of the Data it has collected. As such, it ensures that only authorized persons have access to your Data.

Within the strict framework of the purposes listed above, only those authorized on account of their activity in the relevant departments of DNCA have access to your Data within the limit of their authorizations.

Likewise, our service providers or partners may have secured access to all or part of your Data within the framework of performing their service or our partnership.

We send your Data to third parties, such as:

- The service providers or subcontractors to which DNCA entrusts operational duties and services;
- Legal and financial authorities or other government bodies.

[For how long is your Data kept?](#)

DNCA keeps your Data solely according to the purposes of the processing and in compliance with its legal and regulatory obligations.

The length of time for which your Data is kept varies and depends on the purposes of our processing:

Type of processing	Retention period
Management of our products and services	5 years maximum after the end of the contractual relationship
If no contract is signed	6 months
Money-laundering and the financing of terrorism	5 years after performance of the operation for information justifying the operation
Anti-fraud	5 years maximum after the end of the fraud investigation When legal proceedings are instigated, the Data is kept until the end of the proceedings

[What rights do you have over your Data?](#)

You have a range of rights over your Data within the limits and under the conditions authorized by regulations, including the right to:

- **Access** all your Data: you can obtain information about the processing of your Data, together with copies of the Data;
- **Correct and update your Data**: if you believe your Personal Data to be inaccurate or incomplete, you are entitled to have the Data modified accordingly;
- **Erasure**: you can ask for your Personal Data to be erased;
- Request the **portability** of your Data: you have the right to ask to recover the Data you have provided or ask for it to be sent to a third party providing this is technically possible;
- **Withdraw your consent** at any time for the processing of your Data that is subject to your consent;

- Lodge a **complaint** with a supervisory authority (in France, the CNIL: [www.cnil.fr](http://www.cnil.fr) / in Luxembourg, the CNPD: [www.cnpd.lu](http://www.cnpd.lu))

**In the case of electronic communications for prospection purposes:** An unsubscribe link is included in each electronic communication from DNCA.

[How to exercise your rights](#)

To exercise your rights, you can contact our **Data Protection Officer** via our website (by clicking on the **DPO form** link) or by post, providing your full name, contact details and a photocopy of your ID document.

Data Protection Officer	
Postal address	Website
<b>DNCA Finance DPO 19, Place Vendôme 75001 Paris France</b>	<a href="http://www.dnca-investments.com">www.dnca-investments.com</a>

[How will you be notified of any changes made to this Policy?](#)

This policy may need to be amended to provide optimal protection for your Personal Data.

We will keep you informed via one of our usual communication channels of any major changes made to this information notice and will invite you to acknowledge any changes on our website [www.dnca-investments.com](http://www.dnca-investments.com).

*DNCA Finance - 19, place Vendôme 75001 Paris - Phone: +33 (0)1 58 62 55 00 - [www.dnca-investments.com](http://www.dnca-investments.com). A management company approved by the Financial Markets Authority under no. GP 00-030 on August 18, 2000. A non-independent investment advisor in the sense of the MIFID II Directive.*

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