

GDPR – General Data Protection Policy

Regulation 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46 / EC (General Data Protection Regulation - "GDPR" or "the Regulation"), which came into force on May 25, 2018, aims to strengthen and improve the protection of your personal data.

Broadly applied, it concerns both entities that operate in the European Union and those that collect data or offer services to citizens of the European Union.

In this context, your personal data cannot be collected, stored, used and their transmission can be carried out only in accordance with the aforementioned regulation, in good faith and in a transparent way, for specific, explicit and legitimate purposes without this treatment cannot be incompatible with those purposes.

Spirit Asset Management has adapted its organization and internal governance system allowing the strengthening of existing measures, thus guaranteeing a level of protection of your data, adjusted to their typology on the one hand and the provisions in force on the other hand.

Your personal data will not be kept longer than necessary for the fulfillment of the purposes for which they are collected and processed.

We collect information about you when you engage us to provide our investment services or investment services and/or when you use our website, for example, when you contact us about our products and/or services.

TYPE OF INFORMATION COLLECTED

The personal information we collect from you (or through our third parties) will vary depending on which products and/or services you engage us to deliver. The personal information we collect might include but is not limited to:

- Identification data such as name, sex, age/date of birth, place of birth, nationality, civil status, photograph, address, telephone number, email address, ID document, national identification number, tax identification number;
- professional details: job title, position, company, CV;
- signature;
- Politically Exposed Person status, criminal convictions/records and Internet searches;
- financial information such as details related to investments (such as risk profiles), , bank account details, details on your wealth, annual revenues, information about transactions, history with us;
- communications including emails, telephone calls and letters;
- your IP address, which pages you may have visited on our website and when you accessed them.

USE OF THE INFORMATION

The use of information made by Spirit AM is mainly based on:

- the performance of a contract to which you are a party (including at a pre-contractual stage),
- our obligation to comply with a legal or regulatory obligation,
- the pursuit of our legitimate interest,
- the performance of a task carried out in the public interest (e.g., to prevent or detect offences),
- when you consent to it.

In general terms, and depending on which products and/or services you ask us to provide, as part of providing our agreed services we may use your information to:

- contact you by post, email or telephone
- verify your identity where this is required
- understand your needs and how these may be met
- maintain our records or perform monitoring of activities in accordance with applicable legal and regulatory obligations
- process discretionary portfolio, investment advisory and reception and transmission of orders services
- process investment management and distribution of investment funds
- prevent and detect crime, fraud or corruption and the provision of financial and other services to persons subject to economic or trade sanctions on an on-going basis in accordance with our AML-CTF procedures, as well as to retain AML-CTF and other required records for screening purposes;
- carry out any other form of cooperation with, or reporting to, competent administrations, supervising authorities, law enforcement authorities and other public authorities (e.g., in the field of anti-money laundering and combatting terrorism financing ("AML-CTF"))

As a matter of principle, we retain personal data for as long as we need during the business relationship or to achieve the investment/fund services we are providing or if imposed by applicable legislation.

We will delete personal data once these are no longer necessary, subject however (i) to any applicable legal or regulatory requirements to store personal data for a longer period, or (ii) to establish, exercise and/or defend actual or potential legal claims, investigations or similar proceedings, including legal holds, which we may enforce to preserve relevant information.

PERSONS ACCESSING INFORMATION

Spirit AM will not sell or rent your information to third parties. It will not share your information with third parties for marketing purposes.

Your personal data will be processed by Spirit AM staff on the basis of the need to know principle. Any staff with access to your information have a duty of confidentiality under the ethical standards that Spirit AM is required to follow.

THIRD PARTY SERVICE PROVIDERS

Spirit AM may transmit your information to its third party service providers, subcontractors and other associated organizations for the purposes of completing tasks and providing services to you on its behalf. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

Please be assured that we will not release your information to third parties unless you have requested that we do so, or we are required to do so by law.

Cross border transfers: There may be occasions when Spirit AM will be a joint controller with another third party where the other third party company is based outside the European Economic Area, such as Switzerland.

Some of these countries may not have the equivalent level of data protection laws as those in your location. If Spirit AM needs to transfer personal data outside the EEA, it will take steps to make sure your personal information is protected and safeguarded such as working only with third parties which are under regulated license with similar obligations or signing EU data protection Model Clauses, if needed.

CONFIDENTIALITY AND SECURITY

Spirit AM is committed to protecting your personal data from accidental or unlawful destruction, loss, alteration, unauthorized access or disclosure by using a combination of physical, administrative and technical safeguards and contractually requiring that third parties to whom we disclose your personal data do the same.

Our employees are required to follow specific procedures with respect to maintaining the confidentiality of your personal information. Additionally, Spirit AM maintains physical, electronic and procedural safeguards to protect the personal information that is processed.

YOUR RIGHTS

You have the right to request a copy of the personal information about you that we hold. Data portability enhances this right, giving you the right to get that personal data in a structured, commonly used and machine-readable format (only for data processing which is carried out by automated means). You can also ask for the data to be transferred directly to another professional (data controller), where technically feasible.

We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

In some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where there is no longer a basis for using your personal information but you do not want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

Then, you may ask for erasure of your personal data (i.e. the right to require that personal data be erased in certain circumstances, including where it is no longer necessary for Spirit AM to process this data in relation to the purposes for which it collected or processed).

Where Spirit AM processes personal data on the basis of your consent, you may withdraw that consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

You may exercise the above rights by contacting our data controller. You have also the right to lodge a complaint with the National Commission for Data Protection (the "CNPD") at the following address: 1, Avenue du Rock'n'Roll, L-4361 Esch-sur-Alzette, Grand Duchy of Luxembourg, or with any other competent data protection supervisory authority in his European Union Member State of residence, if you believe

your privacy rights are being infringed and you are not satisfied with Spirit AM response to your inquiries or otherwise any actions taken by Spirit AM.

Given the volume and scope of activities provided by Spirit AM, it was decided not to appoint a Data Protection Officer (DPO), considering that Spirit AM do not have the status of a public body, nor activities leading to regular and systematic monitoring of large-scale persons or large-scale processing of so-called "sensitive" data or relating to criminal convictions and offenses as more fully detailed in Article 10 of the Regulation.

For more information, please email or send a fax to our controller: Mrs Caroline Quéré - info@spirit-am.lu – fax: +352 26 47 04 30.

An answer will be provided to you as soon as possible and in any case within one month from the receipt of your request. If necessary, this period may be extended by two months given the complexity and the number of requests. In the latter case, the controller will inform you of this extension and the reasons for the delay within one month of receipt of the request. You may submit a complaint about the processing of your personal data to the controller and / or the National Commission for Data Protection:

1, avenue du Rock'n Roll, L-4361 Esch-sur Alzette

www.cnpd.public.lu

COOKIES, TAGS AND SIMILAR TECHNOLOGIES

A cookie is a small text file which includes a unique identifier that is sent by a web server to the browser on your computer, mobile phone or any other internet enabled device when you visit an on-line site. Cookies and similar technologies are widely used to make websites work efficiently and to collect information about your online preferences. For simplicity, we refer to all these technologies as "cookies". Some of Our Website pages may contain electronic images known as web beacons (also known as clear gifs, tags or pixels) that allow us to count users who have visited our pages. Web beacons collect only limited information, e.g. a cookie number, time and date of a page view, and a description of the page on which the web beacon resides. These beacons do not carry any information that could directly identify you.

We use cookies and other tracking technologies to customize content and advertising, provide social media features and to see how our visitors move through Our Website. We use this information to make decisions about ways to improve the services we offer you.