



Registered office: 3, Boulevard Royal, L-2449 Luxembourg, Luxembourg
R.C.S. Luxembourg: Section B, Number 221.009
Share Capital: EUR 2.250.000,-
("AFFM" or the "Company")

PRIVACY POLICY AND DATA PROTECTION

Effective date: 8 June 2026

Regulatory background

The European Union's General Data Protection Regulation (Regulation (EU) 2016/679) (the "GDPR") came into force on 25 May 2018. GDPR extended the data protection responsibilities of EU fund managers as well as extended the direct application of EU data protection law to non-EU entities. In Luxembourg, the GDPR is complemented by the Act of 1 August 2018 on the organisation of the National Data Protection Commission (CNPD) and the general data protection framework. This regulatory notice is solely for information.

Scope of application

GDPR covers the use, storage and transfer ("processing") of information on identifiable individuals ("Personal Data" and, referring to the individuals, the "Data Subject(s)"). This for instance includes Personal Data on investors and investor personnel, on employees, on individuals at service providers, peers, industry bodies, regulators and other organisations, and on website users.

Responsibility

AFFM processes information and Personal Data in connection with existing and / or prospective business relationships, including the use of Company's website.

AFFM does so either as "controller" or as "joint controller", meaning that the Company determines the purposes and is responsible for the processing performed by AFFM or on its behalf. For any questions Data Subjects may have in relation to this notice, AFFM in its role of controller, or more generally the processing of Personal Data, Data Subjects may contact AFFM's Compliance Function, to which data protection responsibilities have been assigned under the supervision of Executive Management¹ at:

¹ As of August 2023 the Board of AFFM decided not to maintain a formally appointed GDPR DPO; responsibility sits with the Compliance Function under Executive Management. The references and contact details above are amended for consistency with the internal Policy for the Processing of Personal Data.

**AFFM S.A.**

Data Protection – Compliance Function

3, Boulevard Royal

L-2449, Luxembourg

Phone: +352 260 967 247 / Fax: +352 260 967 829

Email: dpo@affm.lu

Personal Data

Personal Data processed by AFFM may include identification data (names, addresses, telephone numbers, email addresses, business contact information); personal characteristics (date of birth, country of birth); professional information (employment and job history, title, representation authorities); identifiers issued by public bodies (passport, identification card, tax identification number, national insurance number, social security number); financial information (financial and credit history information, bank details); transaction/investment data (current and past investments, investment profile and preferences, invested amount, number and value of shares held, role in a transaction, transaction details); and cookie information.

AFFM may also process certain special categories of data (e.g. judicial data on clients and client representatives collected to comply with customer due diligence requirements), subject to additional access restrictions and safeguards.

Purposes and Legal bases

AFFM collects and processes Personal Data on the basis of: (i) the performance of a contract to which the Data Subject is a party; (ii) compliance with a legal or regulatory obligation; (iii) the pursuit of AFFM's legitimate interest; and (iv) the performance of a task carried out in the public interest (e.g. to prevent or detect offences). This covers the management, administration and distribution of investment funds and related services; the processing of subscription, conversion and redemption requests; the provision of offering documentation; accounting and MiFID compliance; cooperation with and reporting to competent authorities (including AML-CTF, CRS and FATCA); and fraud, bribery, corruption and sanctions prevention. AFFM also processes Personal Data to develop business relationships, improve its operations, manage risk, and establish, exercise or defend legal claims. Where any processing requires prior consent, the Company will request it in due time.

Who AFFM may share Personal Data with

AFFM may disclose Personal Data to third parties specifically engaged to provide services to the Company (e.g. custodians, brokers, banks or market counterparties, auditors, lawyers, administrators or software and IT suppliers), requiring them to keep the information confidential and secure, to act on the Company's instructions, and to meet GDPR requirements. AFFM may



also disclose Personal Data where under a duty to do so to comply with a court order or other legal or regulatory requirement.

Transfer to third countries

AFFM may disclose, transfer and/or store Personal Data abroad in connection with the performance of contracts related to its business, where necessary to safeguard an overriding public interest, or in exceptional cases foreseen by applicable laws. Transfers may be made to jurisdictions ensuring an adequate level of protection, benefiting from a European Commission adequacy decision, or – absent such adequacy – subject to appropriate safeguards such as the European Commission’s standard contractual clauses.

Retention period

Retention periods vary according to the purpose of processing. Where there is no specific legal requirement to retain data, AFFM keeps it no longer than necessary for the purposes for which it was collected or further processed.

Data Subjects’ rights

Subject to applicable data protection legislation, Data Subjects have the right to:

- request access to, and receive a copy of, the Personal Data held by AFFM;
- if appropriate, request rectification or erasure of the Personal Data that are inaccurate;
- request the erasure of the Personal Data when the processing is no longer necessary for the purposes originally determined, or no longer lawful for other reasons, subject however to applicable retention periods (see previous section);
- request a restriction of processing of Personal Data where the accuracy is contested, the processing is unlawful, or if the Data Subjects have objected to the processing;
- object to the processing of Personal Data, in which case AFFM will no longer process the Personal Data unless AFFM has compelling legitimate grounds to do so (e.g., the establishment, exercise or defence of legal claims);
- receive the Personal Data in structured, commonly used and machine-readable format (data portability right);
- obtain a copy of, or access to, the appropriate or suitable safeguards which the Company may have implemented for transferring the Personal Data outside of the European Union;
- complain in relation to processing of Personal Data and, absent a satisfactory resolution of the matter, file a complaint in relation to the processing of Personal Data with the relevant data protection supervisory authority.



AFFM acknowledges and responds to Data Subject requests without undue delay and in any event within one (1) month of receipt, extendable by up to two (2) further months for complex or numerous requests, in accordance with Article 12 GDPR.

Complaints may be raised with the DPO and, absent a satisfactory resolution, with the relevant data protection supervisory authority. AFFM's Compliance Function and, absent a satisfactory resolution, with the competent supervisory authority – in Luxembourg, the Commission Nationale pour la Protection des Données (CNPD).

Even where a Data Subject objects to processing, AFFM may continue it where the processing is legally mandatory, necessary for the performance of a contract, necessary for a task carried out in the public interest, or necessary for the Company's legitimate interests (including the establishment, exercise or defence of legal claims). AFFM will not use Personal Data for direct marketing where the Data Subject asks the Company not to do so. These rights may be exercised free of charge by contacting the Compliance Function.

Data Subjects located in the EU have the right to lodge a complaint with a supervisory authority, in particular in the Member State of their habitual residence, place of work or place of the alleged infringement.

The Luxembourg supervisory authority is the Commission Nationale pour la Protection des Données (CNPD), 15, Boulevard du Jazz, L-4370 Belvaux (www.cnpd.lu). Contact details for other EU supervisory authorities are available via the European Data Protection Board:

https://www.edpb.europa.eu/about-edpb/about-edpb/members_en.