

LUX NORDIC WEALTH MANAGEMENT S.A.
DATA PRIVACY NOTICE

Preliminary Provisions

Lux Nordic Wealth Management S.A. (“Lux Nordic” or “the Company”) is committed to protecting your privacy and ensuring the highest level of security for your personal data.

We are acting as the ‘controller’ who directly holds personal data and determines how and why your personal data is processed. When we collect your personal data, we are required to provide information about the processing activities. This Privacy Notice aims to give further information about what we do, how we process and secure your personal data and what are your rights as data subject.

This Privacy Notice consists of information applying to you whether you are a client, a potential client interested in our services, a shareholder of a corporate client, or a third party wanting to do business with us or with which we did or do business with. Where you have a contractual relationship with us, then this Privacy Notice is a part of your contract with us and you are bound by it.

The information set out in this Data Privacy Notice will continue to apply even after the termination of your agreement with us for the provision of our services. Please read the following carefully to understand our views and practices with respect to personal data. Wherever we’ve said “you” or “your”, this means you or any person connected to you namely any authorised person, anyone who deals with us for you (e.g. trustees or executors, powers of attorney, external asset managers) and other related people (including but not limited to authorised signatories, partners, members, directors, beneficial owners of companies). Wherever we’ve said ‘we’ or ‘our’, this means Lux Nordic.

1. What kind of personal data does Lux Nordic collect?

Personal data means any information relating to an identified or identifiable natural person. Lux Nordic collects and processes the following types of personal data:

- Personal identification data;
- Personal details (e.g gender, place of birth);
- Official identification data;
- Electronic identification data;
- Data relating to your financial situation;
- Transaction data;
- Sound recording data, particularly in the case of telephone recordings;

Please note that the list is not exhaustive and that the Company may also collect and process personal data to the extent this is useful or necessary for the provision of its services.

The Company does not process sensitive personal data. To the extent you make sensitive personal data, excluding special categories of personal data as defined under art. 9 of the GDPR,

available to Lux Nordic, you consent to Lux Nordic processing such personal data in accordance with this Privacy Notice.

2. How does Lux Nordic collect personal data?

We may collect data about you from the following sources:

Personal data provided to Lux Nordic by you:

We may collect personal data (such as name, contact details, financial details, employment and education details, nationality, date and place of birth, marital status, passport or other identification details and details of visits to our premises) that you provide us, inter alia :

- for the process to enter into a business relationship with us, for example when you fill out our documentation, forms; and
- subsequently correspond with us.

Personal data obtained from third parties:

We also collect and process personal data from publicly accessible sources such as:

- publications/databases made available by official authorities (e.g. Trade and Companies Register);
- our service providers (e.g our Custodian Bank);
- websites/social media pages containing information made public by you (e.g. your own website or social media); and
- databases made publicly available by third parties.

3. Why does Lux Nordic process personal data?

Lux Nordic processes personal data for one of the following purposes/legal bases:

Legal obligation: personal data may be processed for the purposes of complying with applicable legal, tax, statutory and regulatory requirements to which the Company is bound, including financial regulations, legislation relating to the fight against money laundering and the financing of terrorism, company law, tax law, or to respond to any official request from a public or judicial authority.

Contract performance: we use your personal data to enter into and perform our contracts, including to:

- provide you with information regarding our products and services;
- assist you and answer your requests;
- evaluate if we can offer you a product or service and under which conditions; and

Legitimate interest: some of the processing we carry out is necessary to satisfy Lux Nordic's legitimate interests in order to provide and develop our products or services, improve our risk management and/or defend our legal rights.

To provide you with more concrete examples, the processing activities include:

- Customer relationship entry procedures, including verification of the legal capacity of a customer's representatives to enter into a contractual relationship with Lux Nordic;
- Management of our relationships with customers and prospects, including communications concerning our products and services;
- Compliance with legal and regulatory obligations (including "know your customer" regulations, anti-money laundering provisions, sanctions and embargoes legislation, investors' protection...);
- Prevention of tax fraud and compliance with tax audit and notification obligations;
- Response to official requests from a public or judicial authority;
- Defense of our legal rights in the event of a litigation (including transactions recordkeeping, telephone calls recording, etc.);
- Optimization and development of our business activities, products or services;
- Personalization of our offering to you;
- Improvement of the performance, quality and security of our systems.

4. To whom does Lux Nordic provide personal data?

Lux Nordic may disclose or transfer personal data to subcontractors, intermediaries or external advisors for the purpose of the proper performance of the services we provide to our clients. It may, for example, disclose or transfer such personal data to third party service providers who provide administrative, computer, payment, data processing, or other services.

Lux Nordic can also be obliged to disclose or transfer personal data to competent authorities in order to comply with our legal and/or regulatory obligations.

5. Do we transfer personal data outside the EEA?

In principle, your personal data is stored in the European Economic Area ("EEA"), which guarantees an adequate level of data protection. We will only transfer your data outside the European Economic Area if we are required to, pursuant to a legal or regulatory obligation.

6. How do we protect your Personal Data?

The priority for the Company is ensuring that Personal Data is appropriately protected from data breaches. Therefore, Lux Nordic implemented adequate technical and organizational security measures, such as, depending on the equipment, password protection, encryption, physical locks...etc. to ensure a level of security appropriate to the risks represented by the Processing and the nature of the Personal Data to be protected:

- Any special categories of Personal Data that are processed will be stored with enhanced and specific security measures.
- Employees are permitted to access Personal Data for the sole purpose of performing their professional duties and such employees are subject to confidentiality obligations.
- Access rights to Client/Prospect Personal Data are assigned on a need-to-know basis

7. How long do we retain your Personal Data?

We will store your Personal Data only for as long as is necessary for the relevant Processing activity to be completed and/or in accordance with the Personal Data retention period permitted under applicable law. Other organizations that we provide information to, such as law enforcement, will operate different retention periods over which we have limited, if any, control

8. What are your rights?

Personal data processing must comply with 7 data protection principles:

- **Access:** Each data subject has a right of access to their data held by Lux Nordic. Before granting access, the data controller will always verify the identity of the person making the access request regardless of who it is.
The data controller will make sure the requested data is provided within one month of receiving the request. The right of access is in principle free of charge for the data subject unless this represents an excessive burden for Lux Nordic in which case payment may be required.
- **Consent withdrawal:** All data subjects have the opportunity to withdraw their consent at any time. The withdrawal of consent does not compromise the lawfulness of the processing for which it was originally given.
- **Rectification:** Anyone whose personal data has been collected as part of data processing has the possibility, as soon as possible, to have incomplete data completed or to have inaccurate data changed.
- **Erasure (“right to be forgotten”):** Data subjects also have the option of requesting that the data controller delete their data, as soon as possible, when:

- it is no longer required for processing;
 - the data subject withdraws their consent (and there is no other justification for the processing);
 - the data subject objects to the processing;
 - deletion is necessary for compliance with a legal obligation.
- **Opposition:** Data subjects have the right to object, on grounds relating to their particular situation, at any time to processing of personal data. Lux Nordic shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.
- **Restriction of processing:** All data subjects may request that the processing of their data be restricted where:
- the data subject disputes the accuracy of the data concerning them and requests the suspension of the processing to allow the data controller to check the quality of the data;
 - the processing is unlawful and the data subject requests the restriction of its use (not the erasure);
 - the data is no longer needed by the controller but is required for the data subject to exercise or defend their rights in court;
 - the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.
- **Data portability:** Data subjects have the right to receive personal data concerning them which they have provided to Lux Nordic in a structured, commonly used and machine-readable format, and they have the right to send this data to another data controller without the data controller to whom the personal data was communicated obstructing this.

9. Who should I contact and how do I exercise my rights?

Data subjects can make a request to exercise any of these rights by sending the request to the Data Protection Officer at the following address: info@luxnordic.lu

Lux Nordic reserves the right, in the event of a manifestly unfounded or excessive request (repeated request, etc.), to refuse to respond to the request. In case of refusal, the Company undertakes to indicate the reasons for the refusal and the possibilities for appeal to a higher authority.

In order to allow us to process your request as soon as possible, please provide the following information:

- Your client number
- Your last name

- Your first name
- Your email address
- Your telephone number
- The purpose of your request
- A description of your request

Note: You are entitled to ask any question or to lodge a complaint regarding the processing of your personal data with the data protection authority of the EU country or UK in which you live, of your place of work or of the place of the alleged infringement.

When you are resident in the EEA, please contact either the Commission Nationale pour la Protection des données based in Luxembourg: <https://cnpd.public.lu/en.html> or your local authority which you can find: https://edpb.europa.eu/about-edpb/board/members_en

When you are resident in the United Kingdom, please contact the Information Commissioner's Office: <https://ico.org.uk/global/contact-us/>

10. Changes to this Privacy Notice

This Data Privacy Notice is valid as of January 8, 2024. This document is for information purposes only and is not directly binding. This Notice may be updated and amended in the future. We will not necessarily be able to inform you personally. Please check the Lux Nordic website from time to time for any update.