

PRIVACY STATEMENT

At Fidelius Management Company BV, we are committed to maintaining the privacy and confidentiality of our clients and others' personal data. This Privacy Statement outlines how we collect, use and process their personal data.

We are legally bound by the General Data Protection Regulation (GDPR). GDPR applies to collecting, processing and storing personal data undertaken by organisations within the European Economic Area (EEA). It also applies to firms outside the EEA that handle personal data relating to offering goods or services to individuals in the EEA.

The GDPR has two key purposes: (a) to set guidelines for the collection, processing and protection of personal data and (b) to give individuals certain rights concerning their data (such as to access and correct it and object to further processing).

This Privacy Statement is intended to ensure that individuals outside our company with whom we interact are aware of which personal data we (may) collect, how we collect it, why we use it and whom we disclose in accordance with GDPR. These individuals include visitors to our website, personnel of service providers or other suppliers and others who interact with us via our website or by corresponding with us by other means such as email or phone. "Personal data" means any information relating to you, but does not include data where you can no longer be identified from it such as anonymized aggregated data.

We are a data controller in respect of your relationship with us. In this capacity, we are responsible for deciding how to hold and use personal data about you. We may process your data ourselves or through others acting as data processors on our behalf.

We may provide supplemental privacy notices on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. It would be best if you read these supplemental notices together with this Privacy Statement.

What information do we collect about you?

The personal data held by us or on our behalf may include, but is not necessarily limited to, the following: your name, address, place of business, email address, other contact details, corporate contact information, job title, correspondence records, information about how you

use our website and other technical data such as your IP address, login data for our web portal, browser type and version, time zone setting and location.

Why and how do we use your personal data?

We collect, store and use personal data about you for the following purposes:

- to correspond with you
- to undertake business development and marketing activities to make suggestions and recommendations about products or services that may be of interest to you
- to communicate with third parties such as service providers, legal advisors and regulatory authorities to comply with any legal obligation imposed on us or to pursue our legitimate business interests
- to maintain our records
- to administer and maintain our website whereby we may record, monitor and analyse your use of our website

The law specifies certain ‘lawful bases’, which allow us to process your data. Accordingly, in collecting and managing the personal data about you, we have the following legitimate interests in:

- responding to your enquiry, contacting you about the services you provide or otherwise communicating with you in the course of our business
- promoting our products and services
- conducting our business in a proper manner
- developing our business and informing our marketing strategy
- studying how our services are used
- keeping our website updated and relevant

In addition to the uses mentioned above, we also have to comply with applicable legal obligations. Thus, please note that we may process your information where we are required by law to do so. We may also process it if we reasonably believe that it is necessary to protect our rights or comply with judicial or regulatory proceedings, a court order or other legal processes.

Individuals can opt-out of receiving our promotional messages at any time by contacting info@fideliusinvestment.eu

With whom do we share your information?

We may share your personal data with a third party where this is required by law, where it is necessary to perform any contract with you, or where we have another legitimate interest in doing so.

We may need to share your personal data with:

- other entities within our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise or for assistance about marketing and business development;
- professional advisers including lawyers, bankers, auditors and insurers, to the extent such information is relevant to their performance of their services;
- regulators; and any of our service providers where such information is pertinent to their performing of such services;

We may also need to share your personal data with a regulator if the applicable law or judicial process requires it or if we reasonably believe that disclosure is necessary to protect our rights or comply with judicial or regulatory proceedings, a court order or other legal processes.

We may transfer the personal data we collect about you to certain non-EEA countries. Those countries may not have the same standard of data protection laws as the EEA. If this is the case, we will (or will require a processor to) put in place appropriate safeguards such as the EEA-approved standard contractual clauses to ensure that your personal data is treated in a manner consistent with and respects the EEA laws on data protection. If you require further information about this, you can request it from info@fideliusinvestment.eu

How long do we retain your information?

We retain your data as long as it is necessary to fulfil the purposes for which it was collected. These include the purposes of satisfying any legal, regulatory, accounting or reporting requirements and our legitimate interests in maintaining such personal information in our records. In doing this, we have regard to the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process your data, whether we can achieve those purposes through other means, and the applicable legal requirements. Generally, we keep information relevant to our dealings with you for five years following the last date of the activity (or longer if required by applicable laws and regulations).

In some circumstances, your data may be anonymized so that it can no longer be associated with you, in which case it is no longer personal data.

Once we no longer require your data for the purposes for which it was collected, we will securely destroy them in accordance with applicable laws and regulations.

What are your rights concerning your information?

You have a number of legal rights concerning the information we hold about you. These rights include:

- request access to your data (commonly known as “data subject access request”)
- request certain information about its processing;
- request rectification of your data;
- request the erasure of your data;
- request the restriction of processing of your data;
- object to the processing of your data;
- request the transfer of your data to another party.

If you would like to exercise one of these rights, please contact us at info@fideliusinvestment.eu

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that your data is not disclosed to any person who has no right to receive it.

You also have the right to make a complaint at any time to a supervisory authority for data protection issues.

Right to withdraw consent

In limited circumstances where you may have provided your consent to collecting, processing and transferring your data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact info@fideliusinvestment.eu Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you initially consented unless we are required to retain your data for a legal or regulatory purpose.

Accuracy of information

The personal data we hold about you must be accurate and current. Please let us know if your data we have changed during your relationship with us.

Changes to this Privacy Statement

We reserve the right to update this Privacy Statement at any time. We will make the updated copy available to you and notify you when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your data.

Further information

This Privacy Statement is written with brevity and clarity in mind and is not an exhaustive account of all aspects of our collection and use of personal data. If you require any further information, please do not hesitate to contact us via info@fideliusinvestment.eu.