

## MDO Privacy Notice

This privacy notice ("Privacy Notice") sets out how MDO Management Company S.A. and its affiliates, agents and representatives (MDO) will process your personal data as defined below in their capacity as Data Controller and, as the case may be, Data Processor as defined below:

### **I. Purpose of processing and legal basis for the processing**

MDO may, in its capacity as Independent Data Controller, process your Personal Data for its own and following purposes:

- to provide you with information (newsletters) about our services and the events we organize which may be of interest to you or the institution you represent. In that respect MDO may store your name, telephone, email address, as well as other Personal Data. The processing is based on your consent for the purpose of providing you newsletter and information about our services and events;
- for marketing activities. In that respect MDO may store your name, telephone, email address, as well as other Personal Data. The processing is based on our legitimate interest;
- to onboard you as a client. In that respect MDO may contact you or the institution you represent by email, sms, telephone or any electronic means and may collect your name, place and date of birth, nationality, gender, address, email address, telephone number, CV, Identity Card, passport number, information in respect of the source of wealth as well as other Personal Data in order to provide you with information on our service. Such processing is required in order for MDO to conclude any agreement we may contract with you. Should you or the institution your represent object to receiving such information please inform your usual contact of this;
- to execute a relevant contract with you or the institution you represent. In that respect MDO may collect your name, place and date of birth, nationality, gender, address, email address, telephone number, CV, Identity Card, passport number as well as other Personal Data. Such processing is based on the necessity to execute the contract and based on a legal obligation;
- to carry out anti-money laundering (AML) checks and related actions which MDO considers appropriate to meet any legal obligations imposed on MDO. Such processing is required in order to ensure MDO's compliance with Luxembourg laws and regulations as well as in connection with any agreement we may enter into with you. MDO has a legitimate interest in performing such processing in order to prevent any money laundering, fraud, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions, on an on-going basis, in accordance with MDO's AML procedures;
- to report to the Luxembourg tax authorities tax related information in order to comply with MDO's legal obligation. The processing is necessary to ensure compliance with MDO's legal obligation;
- to process your application for a job position. In that respect your name, place and date of birth, nationality, gender, address, email address, telephone number, CV, level of education, employment, employer's name, remuneration as well as other personal information will be processed by MDO. In that respect the processing is based on MDO's legitimate interest;

- to update and maintain records of MDO's fee billing services. In that respect MDO will process your bank account details, credit card number, the processing is based on the execution of a contract and on a legal obligation;
- to comply with legal obligations as necessary for MDO's legitimate interests indicated above and/or where the processing is legally required;
- In the context of rendering service to its clients MDO Management Company S.A and MDO Services S.A are mainly acting as Data Processors for the data they are processing on behalf of their clients and may process, in their capacity as Data Processor your Personal Data for the following purposes:
- to execute a relevant contract with you or the institution you represent. In that respect MDO may collect your name, place and date of birth, nationality, gender, address, email address, function, profession, document in respect of your qualification and education, telephone number, CV, passport number or Identity Card, document in respect of origin of wealth, bank account number, credit card number, marital status, number of children, tax status, and in very specific circumstance your investor data as well as other Personal Data. Such processing is based on the necessity to execute the contract and based on a legal obligation;

Due to the nature of its activities MDO will not collect, store or otherwise process your sensitive personal data such as race or ethnicity, political opinion, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, or any other information that may be deemed to be sensitive under applicable law.

## **II. Disclosure of your Personal Data and International Transfer of Data**

Due to the international nature of its business, MDO may need to transfer your Personal Data within MDO's group. Your Personal Data will only be transfer within MDO's group to European countries which ensure a level of protection for individual's data. MDO will not transfer your personal data to a recipient located outside the European Economic Area unless:

- You have previously approved transfer of your personal data to the relevant country and have not revoke that general approval at the date of this privacy notice;
- The transfer is subject to the terms of a contract incorporating the EU Standard Contractual Clause in the form adopted by the European Commission under Decision 2010/87/EU, Decision 2004/915/EC or an equivalent or replacement decision;
- The recipient is in a jurisdiction in relation to which there is a European Community finding of adequacy;
- The transfer is to the United States of America to an entity that is a certified member of the US Privacy Shield Scheme.

In addition, MDO may disclose your Personal Data to its auditor, service providers or to the competent authorities (CSSF, Luxembourg Tax Authorities, Luxembourg Court or other bodies) that is necessary in order to provide the Processing as described above. Such disclosure will be done in accordance with the applicable law.

Please note that the disclosure of personal information as set out in the above paragraph may involve the transfer of data to other jurisdictions outside the European Economic Area (EEA). Such countries may not

have the same data protection laws as your jurisdiction. In any case MDO will transfer your Personal Data on the basis of adequacy decisions, suitable Standard Contractual Clauses as approved by the European Union Commission or other valid transfer mechanism.

### **III. Data Security**

As a regulated financial entity MDO and its affiliates are subject to organisational and technical measures to prevent the loss, misuse, accidental or unauthorised disclosure or destruction, or access to your Personal Data.

MDO has/will maintain the appropriate technical and organisational security measures in order to protect your Personal Data against loss, destruction, theft, misuse, unauthorised access, modification or alteration.

### **IV. Retention period**

Your Personal Data will be processed for only the minimum period which is necessary depending on the legal requirements for the purpose for which the data was obtained and/or whether additional legal/regulatory obligations mandate that MDO retains your personal information.

### **V. Data Accuracy and Data Minimisation**

MDO will ensure that the Personal Data it processes are accurate and up-to-date. Personal Data that, to our knowledge, is inaccurate will be erased or rectified. In this respect we may, from time to time, ask you to verify the accuracy of your Personal Data.

In addition, MDO will ensure that the processing of your Personal Data is limited to the relevant purpose of the processing.

### **VI. Data Subjects' Rights**

According to your applicable law you have a certain number of rights regarding the processing of your Personal Data which include:

- the right to access your personal information.
- the right to rectify your personal information.
- the right to restrict the use of your personal information.
- the right to request that your personal information is erased.
- the right to object to processing of your personal information.
- the right to data portability (in certain specific circumstances).

Should you wish to exercise the above rights, please address your query to [gdpr@mdo-manco.com](mailto:gdpr@mdo-manco.com). For identification purpose and in order to access to your request, please provide us with a copy of your Identity Card or copy of your passport.

Please note that the exercise of the above rights is subject to certain condition and in particular to legal obligations such as the minimum retention period for which MDO must comply with.

Where MDO requires your personal information in order to comply with AML or other legal requirements, failure to provide this information means MDO may not be able to provide the Services or the service to the institution you represent.

Please note that, in the case where you have provided your consent to receive newsletter or information about our services or events we might organise, you may withdraw your consent at any time by unsubscribing via the link provided in the footer of our newsletters or by contacting <http://www.mdo-manco.com/gdpr>.

The present policy is subject to modification and therefore you are invited to regularly consult our website in order to be informed as to the latest version.

You have the right to lodge a complaint with the applicable Data Protection Authority.

How to contact us: either fill in the webform found here <http://www.mdo-manco.com/gdpr> or by email to [gdpr@mdo-manco.com](mailto:gdpr@mdo-manco.com)

If you have any questions about our use of your personal information, please contact via the webform here <http://www.mdo-manco.com/gdpr> or address your request to: [gdpr@mdo-manco.com](mailto:gdpr@mdo-manco.com)

**MDO**