

Protection of privacy is a primary consideration for ParFi Group.

Our Privacy Policy applies to physical persons and aims to explain clearly and simply to you - as a client, a potential client, a person connected to a client or to a potential client (for example, as a representative of a client or a beneficial owner of a client who is a legal entity or of an operation), a visitor on our website - how we collect, use and store your personal data.

This Policy applies both to data which are initially collected when you contact a member company of ParFi Group and data which are later obtained by ParFi Group (for example, when request for an additional service, or when you update data that you have initially provided).

Your data are currently processed in compliance with the law, which is currently the Regulation (EU) No 2016/679 of 27 April 2016, the General Data Protection Regulation, known as "GDPR", or any piece of legislation amending it. For more detailed information about data protection, please visit the CNPD website (<https://cnpd.public.lu/en/legislation/droit-lux.html>).

This policy is updated regularly. Please check our Website regularly to find out which version currently applies.

1. Who is your data controller?

For all companies of ParFi Group, you can contact our data protection officer ("DPO") :

by mail to :

ParFi Group
c/o *Data Protection Officer*
3A, Boulevard Prince Henri
L-1724 Luxembourg

by e-mail to dpo@parfigroup.eu

We do everything that we can to comply with the current data protection regulations, as well as measures implemented, overseen by the CNPD.

If for some services, we call upon specialist partners, who work as data processors, these partners must comply with our personal data protection policy and must also fulfil their relevant statutory obligations. We strive to ensure that your personal data are protected through appropriate provisions in our contracts with data processors, as well as other parties that may help us to process your personal data or that receive your data from us.

2. What do we mean by personal data?

By personal data, we mean not only data that identify you directly, but also data that identify you indirectly.

We generally need to collect the following different types of personal data:

- identification data: your last name, first names, addresses, identity card numbers, e-mail addresses, telephone numbers, etc.;
- financial data: your bills, payslips, income, the value of your personal property or real estate, Repayment capacity , the origin of your funds or assets, etc.;
- personal data: your age, gender, date of birth, place of birth, civil status and nationality;
- household composition data: your family situation, details about other members of your household, etc.;
- data relating to your investor profile: your knowledge of financial instruments and your experience with them, as well as your financial situation, including your ability to bear losses, your investment objectives and your risk tolerance;
- data relating to your activity and your interests when you browse our Website or when you use our mobile apps;
- electronic data: records of e-mail communications;
- data obtained via third parties: data supplied by public bodies, etc.

We do not process sensitive data, namely data relating to a person's health, racial or ethnic origin, political opinions, religion or beliefs, trade union membership or sex life.

3. When do we collect these data?

When you become a client or when a client discloses your data to us;
When you contact us via one of the channels available to you;
When you sign up for a service agreement;
When you use one of our products or services;
When you visit our Website;
When you fill in one of our forms or sign a contract with a company of ParFi Group.

4. Where do we collect data about you?

In most cases, you provide us the personal data that we process. However, we do also obtain these data via third parties. In particular, this happens when:

- your data are disclosed to us by a client (for example, because you are a beneficial owner or the representative of a legal entity, you are acting as an administrator or you have been named as a beneficiary);
- your data are disclosed to us by your advisor;
- as part of our legal obligations, we consult some external files, such as the UN / EU consolidated sanctions list, OFAC, HM Treasury, SECO, Rosfinmonitoring, Interpol.

5. In what circumstances are you required to send these data to us?

You can visit our public site without sharing your identity with us.

If you want to benefit from our services, you will be required to provide us with some information about yourself. We are legally required to request information from you that we need in order to be able to initiate a relationship with you.

You do, of course, have the right to refuse to disclose this information to us, but, should you do this, you will be unable to enjoy our services.

6. For what purpose and on what basis do we use your personal data?

Generally, we use your personal data:

- in order to comply with any legal and regulatory dispositions to which the companies of ParFi Group are subject;
- as part of the process of executing an onboarding agreement or any other contract with a company of ParFi Group, or when taking pre-contractual measures;
- in order to pursue the ParFi Group companies' legitimate interests, maintaining a balance between these legitimate interests and respect for your privacy, or;
- when we have obtained your consent.

6.1 Statutory obligations

ParFi Group's companies are bound by a number of legal and regulatory obligations that require them to process your data. These obligations mainly fall within the following legal and regulatory areas:

- the obligation to respond to any legitimate request from a public, judicial, prudential supervisory or tax authority, either in Luxemburg or from abroad;
- the obligation to help to prevent money laundering and the financing of terrorism, by identifying clients, representatives and beneficial owners, establishing profiles, and monitoring operations and transactions;
- the obligation to comply with legislation on embargoes determined by the competent authorities in Luxemburg or abroad, against individuals, organizations or citizens of some states, for example, by identifying the people and assets involved;
- the obligation to save and store certain data.

The list of legal and regulatory areas that govern how ParFi Group must process your data is non-exhaustive and may change.

As part of its statutory obligations relating to fighting against money laundering and the financing of terrorism, ParFi Group carries out automated checks, using external sources or data which are specifically requested at that time. These automated checks may possibly result in us refusing you a contract or requesting additional information from you, depending on the case.

For these checks, ParFi Group does not process any sensitive data and strives to avoid any form of discrimination.

6.2 Contractual relations

Before entering into a contract, ParFi Group may and, in some cases, must obtain and process certain data, in particular, in order to:

- respond to your application;
- take an application further, assess suitability and evaluate the risks linked to any contract;

6.3 Legitimate interests

ParFi Group also processes your data in order to pursue its legitimate interests. For this purpose, ParFi Group strives to maintain a fair balance between its data processing needs and respect for your rights and freedoms, particularly privacy protection.

Personal data are therefore processed in order to:

- organize promotional events
- organize thematic conferences

6.4 Consent

In some cases, ParFi Group will only process your personal data if it has specifically obtained your consent to do so.

For example:

ParFi Group will only send you marketing communications by e-mail or by SMS and will only process your electronic-communications data for this purpose if you have provided specific consent for it to do so (see 6.5).

Please note: your consent is only required for market communications that are sent electronically. In all cases, we reserve the right to contact you via any channel of communication and, electronically in particular, as part of the process of executing your contract or if the law requires us to do so.

6.5 Direct marketing

ParFi Group offers you a wide range of products and services and, as a company, it has a legitimate interest in being able to tell you about the products or services that it provides or is promoting. With this in mind, it may need to use your personal data and, in particular, your contact details, in order to send marketing communications to you.

In practice, this means that you may be contacted in the following cases, for example:

- about products in which you showed an interest (for example, by registering for an information session);
- when ParFi Group launches new products or services;
- when you have started a subscription process for a product or service and have not completed it.

As part of its direct marketing activities, ParFi Group may contact you using traditional methods, such as the telephone and ordinary mail. ParFi Group will only use these traditional methods of communication if you have not exercised your right of objection to your commercial data being used for direct marketing purposes (see 10.6).

ParFi Group may also contact you electronically (via e-mail, fax or SMS). However, it will only do this when you have provided your consent for it to do so.

Under no circumstances will ParFi Group disclose your data to third parties so that they can send you marketing communications for their own products and services. Furthermore, ParFi Group will never process sensitive data for direct marketing purposes.

7. Storage period

We try to not store your personal data for any longer than we need for the processing activity that requires us to collect them. When assessing how long we need to store your personal data, we must also take into account the applicable regulatory requirements (requirements stemming from legislation against money laundering and financing terrorism, for example).

More specifically, your personal data as a prospective client will be stored for a maximum period of a year.

8. Data security

We take suitable technical and organizational measures in order to guarantee that your personal data are adequately protected against being lost or accidentally divulged to unauthorized individuals.

We have put in place security technology that complies with international rules and current standards in order to protect your personal data.

You can also help to keep your personal data secure by following these tips:

- use the most recent operating system on your computer and install all of the security updates;
- use the most recent version of your web browser and then install all of the security updates;
- install antivirus software, anti-spyware software and a firewall, and adjust your preferences so that these safeguards are updated regularly;
- do not leave your Device and your log-in details unattended;
- keep your codes confidential.
- only log in from devices that you trust and do not use shared computers/devices for sensitive transactions.

If you don't feel comfortable with a site, do not use it and do not enter any codes/passwords!

Do not open attachments to e-mails that you were not expecting. E-mails may contain viruses or other unwanted software, even if you know the sender. Make sure that your anti-virus software also scans the attachments to your incoming e-mails. Perhaps activate the e-mail filter on your web browser. If you contact us about an issue relating to executing your orders, we will ask you some personal questions in order to identify you.

9. Who receives your data? To whom may your data be transferred?

Within ParFi Group, your personal data can only be accessed by people who need to access them for working purposes.

In some cases, we are required by law to disclose your personal data to third parties:

- to Luxembourg and foreign tax authorities, when the ParFi Group is required to disclose clients' personal data;
- to public or judicial authorities, such as the police, prosecutors, law courts, etc.. This can only be done at their explicit request;
- to lawyers (for example, in relation to a bankruptcy), notaries (for example, when setting up a company);

In some cases, ParFi Group calls upon third parties to provide you with services to which you have subscribed or in order to process your personal data. For example, this can involve:

- specialist providers from the financial sector, who must also fulfil their legal obligations as data processors in relation to personal data; (For example: banking institutions...);
- service providers who help us to:
 - create and maintain our tools;
 - market our activities, organize events and manage communications with clients;
 - develop and/or manage our products and services.

In such cases, we ensure that these third parties only have access to the personal data that they need to complete their specific tasks. We also ensure that our data processors commit to treating data securely and confidentially, and to using them as outlined in our instructions.

Under no circumstances will we sell your personal data to third parties.

10. What are your rights?

10.1 Right of access and correction

You have a right of access to your personal data. In particular, the ParFi Group can provide you with:

- the categories of personal data which have been processed;
- the purposes for which we have collected your data;
- the categories of recipients who have received your data from us;
- the storage period for your data;
- the rationale for using any automated processing on your personal data;
- the source of any processed personal data, if it was not collected from you.

If you discover that your data are inaccurate or incomplete, you can ask us to correct them.

We take all necessary measures to ensure that your personal data are correct, up-to-date, complete and relevant, which is why we ask you to keep us informed of any changes (new addresses, new identity cards, acquisition of a new nationality, etc.).

If we correct your data and we have previously shared them with third parties, we will also notify them of these corrections.

10.2 Right to be forgotten

In some specific cases, legislation enables you to have your personal data deleted.

This is particularly the case if the data are no longer needed for the purposes for which we have collected them (for example, because you have disclosed your contact details to us in order to take part in an event which has finished), if we have only processed your data because you provided your consent for us to do so and you decide to withdraw it, or if you object to your data being processed and we have no legitimate reasons which take precedence over yours.

However, ParFi Group may store your personal data when they are needed for establishing, exercising or defending its rights in court, or for ParFi Group to comply with its statutory obligations. ParFi Group will therefore be required to comply with storage periods stipulated by different laws, particularly when the data have been collected as part of our obligations relating to fighting against money laundering and the financing of terrorism (see point 7).

10.3 Right to restrict processing

This particular right of objection enables you to ask ParFi Group to block your data **temporarily** in specific cases set out by regulations: ParFi Group will then no longer be able to process your affected data for a specified time.

You can ask for your data to be blocked:

- when the data in question are inaccurate, incomplete, ambiguous or out-of-date, for the amount of time needed to enable us to ensure that your data are accurate;
- when collecting, using, disclosing or storing them is prohibited;
- when the data are no longer needed for processing purposes;
- for the period of time needed by ParFi Group to assess the merits of an objection request.

If you exercise this right, we will be able store your data, but we will no longer be able to carry out any further processing on them, except when you provide your consent for us to do so, or in order to establish, exercise or defend our rights (or the rights of another person).

10.4 Right to data portability

Thanks to this right, you can ask ParFi Group to send your personal data to you or to send them directly to another data controller, when this is technically possible for ParFi Group. This right only applies to data which you yourself have supplied to ParFi Group and which are automatically processed, on the basis of the contract or when you have provided your consent.

You can make a request to dpo@parfigroup.eu

10.5 Right to withdraw your consent

When your data are only being processed because you have provided your consent, you have the right to withdraw this consent at any time. However, withdrawing your consent does not provides the grounds for you to call into question the legality of the processing activity carried out during the period before you withdrew your consent.

10.6 Right of objection

You always have the right to object to your data being used for direct marketing purposes, without any justification and at no expense (see 12). If this occurs, your data will no longer be used for this purpose.

Furthermore, you also have the right to object, for reasons relating to your particular circumstances, to any processing of your personal data which has been carried out to further our legitimate interests. However, we will be unable to grant your request if our legitimate interests prevail over yours or if we are required to process your data in order to establish, exercise or defend our rights in court.

11. How can you exercise your rights?

In order to exercise your rights, you can send your dated and signed request to us, together with a readable copy of the front and back of your identity card, with as many specific details as possible:

by mail to :

ParFi Group
c/o Data Protection Officer
3A, Boulevard Prince Henri
L-1724 Luxembourg

by e-mail to dpo@parfigroup.eu

Upon receiving your complete request, we will respond to it within 30 calendar days.

If you request any additional copies when exercising your right to access your personal data, we may charge you a reasonable amount for administrative costs.

12. How can you let us know that you no longer wish to receive marketing offers?

If you no longer wish to receive commercial offers from us or wish to receive fewer of them, you can let us know by writing us a mail or email as suggested in point 11. For example, you can choose to receive only some of our newsletters or let us know your communication preferences.

13. Who should you contact if there is a dispute?

If there is a dispute relating to processing your personal data, you can submit a mediation request to the Commission for the Protection of Privacy at the following address:

NATIONAL COMMISSION FOR DATA PROTECTION

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

Tel. : (+352) 26 10 60 - 1
Fax: (+352) 26 10 60 - 29