



Privacy Policy

Protecting your privacy

At Probus Pleion Luxembourg S.A., your privacy is paramount. We understand the importance of the trust you place in us by sharing your personal information. This policy aims to clarify how we handle your personal data, whether provided by you or a third party.

As the Data Subject, it is essential for you to know the nature of the personal information we collect about you, the reasons for its processing, and how we as the data controller undertake this responsibility. Our data protection practices adhere to the EU General Data Protection Regulation (GDPR), effective from May 25, 2018. This document outlines your rights under this regulation.

Please note, we may occasionally update this Notice. The latest version will always be available on our website. We advise you to review it periodically to stay informed about our privacy practices.

Our Commitments to Your Privacy:

- ◆ Your data will be kept secure and confidential.
- ◆ We will facilitate the exercise of your rights concerning your personal information.
- ◆ Our staff receives training to handle your personal information appropriately and responsibly.

Scope of Privacy Policy

This Policy applies to the handling of personal information in the following situations:

- a) For individuals residing in the European Economic Area (EEA) or those outside the EEA who use our services. This includes investors in funds managed by Probus Pleion Luxembourg S.A. and account holders.
- b) For the personal data of our external directors, whether they are located in the EEA or serve in roles related to funds that we market within the EEA.
- c) Concerning the personal information of our clients, suppliers, and firms that refer clients within the EEA.
- d) Pertaining to the personal information of individuals in the EEA who access our websites specifically designed for EEA users, as indicated on the respective webpages.

What Personal Information We Collect and Why?

Data Protection laws permit us to use and share personal information for legitimate reasons. These include:

- ◆ To fulfil a contract with you.
- ◆ To comply with our legal obligations.
- ◆ For our legitimate business interests*.
- ◆ Based on your consent.

(*) 'Legitimate interests' refer to valid business or commercial reasons for using your information, provided they do not unfairly impact your rights.



We typically collect the following personal information directly from you or through third parties:

- ◆ Identification details (name, gender, date/place of birth, addresses, phone numbers, emails).
- ◆ Professional information (job title, position).
- ◆ Signature.
- ◆ Nationality or civil status.
- ◆ Photograph.
- ◆ Passport or other national identification numbers.
- ◆ Tax identification (e.g., National Insurance Number).
- ◆ Personal bank and financial details (account identification, income, financial license for professional investors).
- ◆ Transaction information with account holders or investors.
- ◆ Account history with us.
- ◆ Financial information (fees, bank account details).
- ◆ License and dealer information.
- ◆ Status as a 'Politically Exposed Person', criminal convictions, and potential sources of wealth related to investments.
- ◆ Communications (emails, calls, letters).

The reasons for processing your information may vary depending on your specific situation. More details are available in section 8 of this document. Additionally, we collect personal information through our website and other online platforms.

Your Rights Regarding Personal Information

As an individual, you have certain rights under Data Protection laws, including:

- ◆ Access to your information.
- ◆ Correction of your information.
- ◆ Restricting the use of your information.
- ◆ Requesting deletion of your information.
- ◆ Objecting to information processing.
- ◆ Data portability (under specific conditions).
- ◆ Lodging complaints with a supervisory authority.

To exercise these rights, contact us at +352 26 25 32 05 4 or via email at info@bcblux.lu.

Upon receiving a request to exercise these rights, we will respond promptly, typically within one month. This period may extend by two more months for complex or numerous requests. We provide this service free of charge unless requests are unfounded or excessive. In such cases, we may charge a fee or refuse to act on the request, notifying you of any such fees beforehand.



We may require additional information to verify your identity before fulfilling a request. If we cannot fulfill a request, we will explain the reasons within one month of receiving it.

Children's Privacy

Probus Pleion Luxembourg S.A. recognizes the importance of protecting the privacy and safety of children. Our website and services are not designed for, nor intentionally targeted at, children under the age of 16. We do not knowingly collect or maintain personal information from children under this age. If we become aware that we have collected personal data from a child under 16 without verification of parental consent, we will take steps to remove that information from our servers. If you believe that we might have any information from or about a child under the age of 16, please contact us at the provided contact details.

Specific Rights Explained

a) Right to Access Personal Information

- ◆ Verification Right: You can confirm whether we process your personal information and get specific details about such processing.
- ◆ Access and Copy Right: You have the right to access your personal information and receive a copy of it.

b) Right to Restrict Processing of Personal Information

You can request that we limit processing of your personal data in these situations:

- ◆ Accuracy Dispute: If you challenge the accuracy of your personal information, processing will be restricted until its accuracy is verified.
- ◆ Unlawful Processing: If the processing is unlawful and you prefer restriction over erasure.
- ◆ Legal Claim Requirement: When the personal information is no longer needed for processing purposes but is still required for a legal claim.
- ◆ Processing Objection: If you object to processing and we are verifying whether our legitimate reasons for processing override your interests.

c) Right to Object to Processing of Personal Information

- ◆ Marketing Objection: You can object to your personal information being used for marketing purposes at any time.
- ◆ Legitimate Interest Objection: If processing is based on our legitimate interests, you can object. We will stop processing until we determine whether our legitimate reasons override your interests, rights, and freedoms, or if continued processing is necessary for legal claims.

d) Right to Rectification of Personal Information

- ◆ Correction Request: If you believe the personal information we hold is inaccurate, you can ask for it to be corrected or completed, if it is incomplete.

e) Right to Request Erasure of Personal Information ("Right to be Forgotten")

You can request deletion of your personal information in situations such as:

- ◆ No Longer Necessary: The information is no longer needed for the purposes it was collected or processed.



- ◆ Withdrawn Consent: If processing was based on consent which has been withdrawn and there's no other legal basis for processing.
- ◆ Objection to Processing: If you objected to processing and there are no legitimate reasons for the processing to continue.

Exceptions to Erasure:

- ◆ We may refuse erasure requests if the information is required for legal compliance or claims.
- ◆ Requesting erasure may remove records beneficial to you, like being on a suppression list. You might need to provide your information again for future interactions.

f) Right to Data Portability

If we process your personal information based on your consent or as necessary for a contract you're part of, and if this processing is done electronically, you have the right to:

- ◆ Obtain your personal data in a structured, commonly used, and machine-readable format.
- ◆ Transfer this data directly to another organization (data controller), if technically possible.

g) Right to Contact Supervisory Authority

You have the right to file a complaint with a supervisory authority, especially in:

- ◆ The EU Member State where you live.
- ◆ The EU Member State where you work.
- ◆ The place where you believe there has been a breach of Data Protection laws.

For more information or to lodge a complaint, visit:

<https://cnpd.public.lu/en/particuliers/faire-valoir/formulaire-plainte.html>

Marketing Communications

As an account holder, investor, business contact, or subscriber, you will receive updates about our products and services via email, based on the information you provided. We will seek your consent before using your personal email addresses or as required by law. You can modify your communication preferences at any time by contacting us as outlined below.

We also ensure that external companies helping us with marketing, or those we have joint marketing agreements with, are contractually bound to maintain the confidentiality of your personal information and use it solely to perform the services we request.

International Transfers & Data Sharing

Your personal information, as described in this Notice, is not transferred or stored on servers outside the European Economic Area (EEA). However, data transfers may occur to countries outside the EEA, such as Switzerland, where data protection laws may differ from those in your region. In such cases, we use EU-approved Data Protection Model Clauses to ensure the protection and security of your data outside the EEA. For more details on these safeguards, please contact the management of Probus Pleion Luxembourg SA.

We may also share or transfer your personal information in the event of a merger, sale, or intended transfer of Probus Pleion Luxembourg S.A. or its assets.



Retention Periods

We retain your personal information as long as necessary to fulfill the purposes for which it was collected, in compliance with legal and regulatory requirements. This typically means keeping the data for the duration of our relationship, plus:

- ◆ The period mandated by tax, company, and financial services laws and regulations.
- ◆ A period necessary for you to initiate legal claims against us, or for our defense against such claims, usually equivalent to the length of our relationship plus the duration of any applicable statutory limitation period.

The exact retention period may vary by jurisdiction, but generally, it extends to 10 years after the end of our relationship. In specific cases, such as ongoing correspondence, ongoing claims, or investigations, we may retain data for longer periods.

Confidentiality and Security Measures

We have put in place effective technical and organizational measures to protect your personal information from accidental loss and unauthorized access, use, alteration, or disclosure. Our employees adhere to specific procedures to maintain the confidentiality of investor information. We also maintain robust physical, electronic, and procedural safeguards to secure the personal information we handle.

Data Breach Notification Process

In the unlikely event of a data breach, Probus Pleion Luxembourg S.A. is committed to promptly addressing and mitigating any potential impact. Our process is as follows:

- ◆ **Detection and Assessment:** Upon discovering a data breach, our immediate priority is to identify and assess the nature and scope of the breach. We will determine the type of data involved, the likelihood and severity of any risk to individuals' rights and freedoms, and take necessary steps to secure and prevent any further unauthorized data access.
- ◆ **Containment and Recovery:** We will take immediate action to contain the breach and recover any compromised data, where possible. This includes technical and organizational measures such as system audits, isolating affected systems, and securing network infrastructures.
- ◆ **Notification to Authorities:** If the breach poses a risk to the rights and freedoms of individuals, we will notify the appropriate data protection authorities without undue delay, and no later than 72 hours after becoming aware of it, as required by the GDPR.
- ◆ **Communication to Affected Individuals:** In cases where the breach is likely to result in a high risk to the rights and freedoms of individuals, we will directly inform those affected as soon as possible. This communication will provide clear and transparent information about the nature of the breach, the potential impact, the steps taken to address it, and guidance on how they can protect themselves.
- ◆ **Documentation and Review:** Every data breach will be recorded and documented, irrespective of its impact. We will also conduct a thorough review of the incident and our response to it, to improve our data security measures and prevent future breaches.
- ◆ **Ongoing Support and Updates:** We will provide ongoing support to affected individuals and keep them informed about remedial actions and updates related to the breach.



Our commitment is to uphold the highest standards of data protection and to act with transparency and responsibility in the interest of all our stakeholders.

Details on Data Subjects

a) Account Holder and Investor Personal Information

We collect personal data from individuals who hold accounts or invest in Probus Pleion Luxembourg S.A. Funds, including shareholders and service recipients. Information sources include direct interactions with account holders and investors, referrals from professional advisers, intermediaries, banks, or compliance-driven third-party lists (e.g., for Politically Exposed Persons, sanctions). Collection methods range from applications to electronic forms.

Types of Personal Information Collected:

- ◆ Identification and communication data: Names, positions, addresses, phone numbers, email addresses, age, birth details, nationality, gender, civil status, and photographs.
- ◆ Identification numbers: Tax, passport, and other national IDs.
- ◆ Financial information: Bank account details, account IDs, income, and financial licenses (for professional investors).
- ◆ Transaction and account history: Investment details, account balances, transaction instructions, and history with us or associated companies.
- ◆ Communication records: Investment-related inquiries and telephone call recordings.
- ◆ Know Your Client (KYC) information: Politically Exposed Person status, criminal convictions, and source of wealth information, subject to consent or legal authorization.

b) Purpose of Using Account Holders and Investors Personal Information:

We utilize the personal data of account holders and investors for various essential functions:

- ◆ Identity Verification and Compliance Checks: To confirm identities and conduct transactional reviews for anti-money laundering, fraud prevention, anti-terrorism financing, anti-bribery, and anti-corruption. This includes ensuring we do not offer services to those subject to economic or trade sanctions.
- ◆ Fund Management: Managing the holdings of account holders and investors in relevant funds, responding to their requests, and executing transactions. This also involves facilitating investment advisers in providing account management services, like access to account views.
- ◆ Service Improvement: Conducting internal analysis and research to enhance our services and better manage accounts.
- ◆ Operational Testing: Performing live tests on our systems to swiftly resolve internal issues and uphold high service standards.
- ◆ Data Protection: Safeguarding the holdings and personal data of our account holders and investors.
- ◆ Informative Communications: Offering account holders and investors additional options or information about products and services of potential interest, subject to their consent.

Legal Justification for Data Processing:



- ◆ Legal Compliance: Fulfilling legal obligations, including regulatory disclosures and recording services for telephone communications.
- ◆ Contractual Obligations: Meeting our commitments under contracts with account holders and investors.
- ◆ Public Interest Tasks: Conducting verification processes for fraud, money laundering, terrorist financing, bribery, and corruption prevention, and avoiding services to sanctioned individuals.
- ◆ Legitimate Interests: Balancing our business interests with the rights and interests of account holders and investors. This includes enhancing our services, complying with regulations, improving fund performance, conducting internal audits, ensuring system resilience, obtaining professional advice, and managing legal matters.

Further Information and Consent Management:

Account holders and investors can reach out to the management of Probus Pleion S.A. for more information on how their personal data is used in our legitimate interests. We process personal data based on consent for specific purposes like marketing communications and determining if an individual is a Politically Exposed Person under KYC norms. Consent withdrawal can be made by contacting the management. In scenarios where essential personal information isn't provided (e.g., for anti-money laundering checks), our ability to offer services or comply with legal obligations may be affected. We will communicate the implications of such scenarios to the concerned parties.

c) Disclosure of Account Holders' and Investors' Personal Information:

In the course of managing and servicing the accounts of our holders and investors, we share their personal information with various entities, including:

- ◆ Referral Partners: This includes financial service providers who introduce account holders and investors to us, particularly those offering banking, trust, and custodial services, facilitating the processing of data for stated purposes.
- ◆ Service Providers: Entities like administrators, custodians, and transfer agencies, who assist in servicing or maintaining accounts on our behalf or for the account holder or investor.
- ◆ Technical Support Providers: Third parties offering technical services for processing investor transactions or managing their investments, such as suppliers of banking applications, other IT systems, and printing services.
- ◆ Transaction Processing Entities: We share information with systems operators crucial for performing transactions for account holders and investors, including trade messaging systems.
- ◆ Professional Advisors to Probus Pleion Luxembourg S.A.: This includes external entities like auditors and lawyers who provide professional services.
- ◆ Legal Representatives: Parties representing an account holder or investor in legal proceedings.
- ◆ Regulatory and Legal Authorities: Competent authorities such as tax offices, courts, regulators, security, and police authorities, as required by law or when necessary.



- ◆ **Portfolio Management Services:** As part of our extended portfolio management services, we may also share relevant information with our PMS provider, which assists in the tailored management of investment portfolios, ensuring alignment with individual investor goals and preferences.

These disclosures are crucial for the efficient management of accounts, adherence to legal and regulatory obligations, and the overall safeguarding of our account holders' and investors' interests.

d) Collection of External Directors' Information

We gather specific data from our external directors, including authorized signatories and officers of our funds. This data encompasses:

- ◆ Identification details: Names, addresses, phone numbers, and email addresses.
- ◆ Tax information: Such as National Insurance Numbers.
- ◆ Passport details.
- ◆ Financial information: Including fees paid and bank account details.
- ◆ Communication records: Emails, telephone calls, and written correspondence.

e) Usage of External Directors' Information

The personal information of external directors is utilized for:

- ◆ **Contractual Management:** Managing and fulfilling our obligations under contracts with external directors.
- ◆ **Legal Compliance:** Adhering to contractual, legal, and regulatory requirements, including onboarding processes.
- ◆ **Business Management:** Facilitating the effective management of our business and ensuring the fulfillment of the duties of our external directors.

Legal Basis for Processing Information:

- ◆ **Contractual Obligations:** Fulfilling our commitments under contracts with external directors.
- ◆ **Legal Duties:** Complying with legal obligations, which may include various legal or regulatory disclosures.
- ◆ **Public Interest:** Engaging in tasks like fraud, money laundering, terrorist financing, bribery, and corruption prevention, and avoiding services to sanctioned individuals.
- ◆ **Legitimate Interests:** Balancing our business interests with the rights of external directors, including service improvement, regulatory compliance, and enhancing fund performance.

Additional Information and Compliance:

- ◆ External directors seeking more details on how their personal information is used in line with our legitimate interests can contact the management of Probus Pleion S.A.
- ◆ In situations where an external director fails to provide necessary information (e.g., for anti-money laundering checks), our ability to fulfill contractual obligations or comply with legal requirements may be impacted. We will communicate the implications of such non-provision to the concerned external director.



f) Disclosure of External Directors' Information

We share the personal information of external directors with various entities for operational and service purposes:

- ◆ Service Providers: This includes payroll providers who manage compensations on our behalf.
- ◆ Financial and Administrative Partners: Custodians, brokers, dealing platforms, trade messaging systems, banking platforms, and others involved in providing administration, transfer, or asset management services.
- ◆ Technical Support: Third parties maintaining our information systems, such as IT system suppliers and technical service providers like printing companies.
- ◆ Professional Service Providers: Entities like auditors and lawyers who offer professional services to Probus Pleion Luxembourg S.A.
- ◆ Regulatory Bodies: We disclose information to tax authorities, courts, regulatory agencies, and security or police authorities as required by law or when deemed necessary.

g) Collection of Business Contact Information

We gather personal details from our business contacts in the financial sector, including bank representatives, financial firms, professional advisers, and suppliers. The information includes:

- ◆ Names, job titles, professional roles, and contact details.
- ◆ Records of communications with these contacts.
- ◆ Financial licensing details, dealer numbers, and dealer names.

h) Use of Business Contact Information

The collected information is used for various business-related purposes:

- ◆ Communicating about our services offered to mutual clients or investors referred by our business contacts.
- ◆ Enabling business contacts to access our online services.
- ◆ Sending marketing communications about services and products potentially interesting to them or their referred clients or investors.
- ◆ Inviting business contacts to events and for internal analysis to enhance our services.
- ◆ Discussing goods and services we obtain from our suppliers

Legal Basis for Processing:

- ◆ Fulfilling contractual obligations with other businesses.
- ◆ Pursuing legitimate interests, balanced against the interests and rights of the business contacts.

Further Information and Consent Management:

- ◆ Business contacts can reach out to the management of Probus Pleion S.A. for more details on how their information is used according to our legitimate interests.



- ◆ If a business contact doesn't provide necessary information (e.g., for our online services), it might affect our ability to fulfill our contractual obligations or offer our services. We will clearly communicate the implications of not providing required information.
- ◆ Consent for marketing communications will be obtained as per legal requirements, and business contacts can withdraw their consent by contacting Probus Pleion S.A.'s management.

i) Sharing of Business Contact Data

We share the personal information of our business contacts for operational and compliance purposes with various entities:

- ◆ **Financial Service Providers:** This includes custodians, brokers, dealing platforms, trade messaging systems, and banking platforms. Additionally, third parties engaged in administration, transfer, or asset management services related to the services we offer to account holders, investors, and institutional clients.
- ◆ **Technical and Database Management Partners:** Third parties assisting in servicing and maintaining our business contact databases and systems that process account information. This encompasses suppliers of IT systems we use for data processing and providers of other technical services like printing.
- ◆ **Professional Service Providers:** Entities providing services to Probus Pleion Luxembourg S.A., such as auditors and lawyers.
- ◆ **Regulatory and Legal Authorities:** We may disclose information to tax offices, courts, regulatory agencies, security, and police authorities when required or requested by law or in situations we deem it necessary.

These disclosures are essential for maintaining our business operations, managing client relationships effectively, and ensuring compliance with legal and regulatory obligations.

Web-Related Collection of Personal Information

We gather personal data from users interacting with our website. The types of information collected include:

- ◆ **User-Provided Information:** This is information that users enter on our website, such as through a "Contact Us" form, which typically includes names, email addresses, and salutations.

Regarding the use of cookies and other tracking technologies on our website, please refer to the relevant section below.



Basis for Processing Personal Information:

- ◆ Consent: We process personal information based on user consent, particularly for sending marketing communications. Users have the option to unsubscribe or contact the management of Probus Pleion S.A. to withdraw their consent.
- ◆ Legal Compliance: We also process information in compliance with legal and regulatory requirements.
- ◆ Legitimate Interests: Our processing is sometimes based on legitimate interests, which we balance against the interests and rights of website users.

Our legitimate interests in processing this information include:

- ◆ Promoting our products, services, and funds through our website and other communications.
- ◆ Monitoring, investigating, and reporting any security breaches of our website.
- ◆ Enhancing the performance and user experience of our website.
- ◆ Fulfilling our contractual obligations with users.
- ◆ Managing our business and brand, including monitoring our public profile and addressing complaints.
- ◆ Improving website security and performance.

External Links

Please be aware that our website may contain links to external sites operated by third parties. These external sites are not under our control, and we recommend reviewing their privacy policies to understand their practices regarding personal information.