



Personal Data Notice

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Protecting Your Personal Data

Trust is the cornerstone of the relationship we build with our clients. Protecting the personal information entrusted to us is therefore an integral part of our commitment.

As part of its wealth management activities, Probus Pleion Luxembourg S.A. processes personal data in order to provide its services, comply with its legal and regulatory obligations and maintain a high-quality business relationship with its clients.

This Notice explains, in a clear and transparent manner:

- › the personal data we collect;
- › why we process your personal data;
- › with whom your data may be shared;
- › how long your data is retained; and
- › your rights and how you may exercise them.

We ensure that all processing of personal data is carried out in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR) as well as the legal and regulatory requirements applicable to Luxembourg financial sector professionals.

1. What Personal Data Do We Collect?

The personal data we collect depends on the nature of our relationship with you, the services you request and the legal and regulatory obligations to which we are subject.

Depending on the circumstances, we may process the following categories of personal data:

Category of Personal Data	Exemples
Identification data	First name, surname, date and place of birth, nationality, copy of an identity document, signature.
Contact details	Postal adress, email address, telephone number.
Personal and professional information	Family situation, occupation, employer, position or professional activity.
Financial and wealth information	Income, assets, source of funds, source of wealth, financial capacity, tax residence and tax identification number.



Regulatory information	Information required to comply with anti-money laundering and counter-terrorist financing (AML/CFT) obligations, international financial sanctions, politically exposed persons (PEPs), FATCA, CRS and other applicable regulatory requirements.
Investor profile	Investment objectives, investment horizon, risk tolerance, knowledge and experience of financial instruments, financial situation and ability to bear losses, in accordance with MiFID II requirements.
Business relationship information	Correspondence, contractual documentation, instructions, transactions carried out, communications with our staff and, where required or permitted by law, recorded telephone conversations.
Technical data	Information relating to the use of our website, information systems or electronic communication tools, in accordance with our Cookie Policy where applicable.

Important :

Certain information is necessary for us to establish or maintain a business relationship with you. If the required information is not provided, we may be unable to offer certain services or may be legally required to decline or terminate the business relationship.

2. How Do We Collect Your Personal Data?

In most cases, the personal data we process is provided directly by you or by your authorised representative when establishing our business relationship and throughout its duration.

In order to comply with our legal and regulatory obligations, or to ensure that the information we hold remains accurate and up to date, we may also collect certain information from authorised third parties, including:

- ◆ official registers and publicly available databases;
- ◆ public authorities and competent bodies;
- ◆ financial institutions and custodian banks, where necessary for the provision of our services;
- ◆ specialised service providers assisting us in complying with anti-money laundering and counter-terrorist financing requirements, international financial sanctions screening or politically exposed person (PEP) screening;
- ◆ our business partners or tied agents, where they are involved in the establishment or management of the business relationship.

We may also update the information we hold about you whenever necessary to comply with our legal obligations or to ensure that our records remain accurate.



3. Why Do We Process Your Personal Data?

We process your personal data only where necessary and on the basis of one of the lawful grounds provided for by the General Data Protection Regulation (GDPR).

Our main processing activities are set out below:

Purpose of Processing	Lawful Basis
Preparing and establishing a business relationship	Pre-contractual measures and performance of a contract
Providing portfolio management and investment advisory services and managing our ongoing business relationship	Performance of a contract
Assessing the suitability of our services and investment solutions in accordance with MiFID II requirements	Compliance with a legal obligation
Verifying your identity and complying with anti-money laundering and counter-terrorist financing (AML/CFT) requirements	Compliance with a legal obligation
Carrying out screening against international financial sanctions, politically exposed persons (PEPs) and other regulatory requirements	Compliance with a legal obligation
Executing transactions on your behalf and liaising with custodian banks and other service providers involved in the delivery of our services	Performance of a contract
Responding to requests from competent authorities and complying with our regulatory, prudential, tax and accounting obligations	Compliance with a legal obligation
Preventing fraud, ensuring the security of our information systems, managing operational incidents and protecting our legitimate interests	Legitimate interests
Improving the quality of our services, managing our client relationships and handling complaints	Legitimate interests
Sending you information about our services, market updates, publications or events	Legitimate interests or consent, where applicable

Our Commitment :

We ensure that every processing activity is carried out for a specific, explicit and legitimate purpose. We do not process your personal data in a manner that is incompatible with the purposes for which it was originally collected.



4. With Whom Do We Share Your Personal Data?

As part of our activities, your personal data is accessible only to authorised persons who require such information in the performance of their duties.

Where necessary, your personal data may be shared with:

- ◆ employees of Probus Pleion Luxembourg S.A. involved in managing your business relationship;
- ◆ financial institutions and custodian banks involved in the execution of transactions carried out on your behalf;
- ◆ specialised service providers, including providers of IT solutions, portfolio management systems, cybersecurity, infrastructure, regulatory compliance, financial sanctions screening and operational support services;
- ◆ our statutory auditor, accounting firms, legal advisers and other professional advisers where their involvement is required;
- ◆ administrative, judicial or supervisory authorities where disclosure is required or authorised by law.

We carefully select our service providers and ensure that they provide appropriate guarantees regarding confidentiality, security and the protection of personal data.

5. Are Your Personal Data Transferred Outside the European Economic Area?

As part of our activities, your personal data is primarily processed within the European Economic Area (EEA).

However, certain service providers or business partners may be located outside the EEA or may host personal data in third countries. In addition, depending on your particular circumstances or the services provided, certain transactions may require the transfer of personal data outside the EEA.

Whenever such transfers take place, Probus Pleion Luxembourg S.A. ensures that they are carried out in compliance with the GDPR by implementing appropriate safeguards, including where applicable:

- ◆ an adequacy decision adopted by the European Commission;
- ◆ the European Commission's Standard Contractual Clauses (SCCs);
- ◆ or any other transfer mechanism recognised under applicable data protection legislation.

6. How Long Do We Keep Your Personal Data?

We retain your personal data only for as long as necessary to fulfil the purposes for which it was collected and in accordance with the legal, regulatory and prudential obligations applicable to our business.



As a general rule:

Category of Personal Data	Retention Period
Prospect data	Up to three (3) years after the last contact, unless you object or a legal obligation requires a longer retention period.
Client data	Throughout the duration of the business relationship and, thereafter, for up to ten (10) years where such retention is required or justified by legal, regulatory, accounting or evidential purposes.
Recorded telephone conversations and other data subject to specific regulatory requirements	For the period required by applicable legislation or, where justified, for up to ten (10) years.

At the end of the applicable retention period, your personal data will be securely deleted, anonymised or archived where continued retention is required by law or for the establishment, exercise or defence of legal claims.

7. What Are Your Rights?

Subject to the conditions and limitations set out in the GDPR, you have a number of rights in relation to the processing of your personal data.

In particular, you have the right to:

- ◆ obtain confirmation as to whether we process your personal data and, where applicable, receive a copy of such data (right of access);
- ◆ request the correction of inaccurate or incomplete personal data (right to rectification);
- ◆ request the erasure of your personal data where the applicable legal conditions are met (right to erasure);
- ◆ request the restriction of the processing of your personal data in certain circumstances (right to restriction);
- ◆ object, on grounds relating to your particular situation, to processing based on our legitimate interests (right to object);
- ◆ withdraw your consent at any time where processing is based on consent, without affecting the lawfulness of processing carried out before such withdrawal;
- ◆ receive your personal data in a structured, commonly used and machine-readable format, where applicable (right to data portability).

The exercise of certain rights may nevertheless be restricted where the processing is necessary to comply with legal or regulatory obligations, in particular those relating to anti-money laundering and counter-terrorist financing or financial services legislation.



Good to Know

Exercising your rights is free of charge. However, where a request is manifestly unfounded or excessive, Probus Pleion Luxembourg S.A. reserves the right, in accordance with the GDPR, to refuse to act on the request or to charge a reasonable administrative fee.

8. How Can You Exercise Your Rights?

Should you have any questions regarding the processing of your personal data or wish to exercise your rights, you may contact the **Data Protection Officer (DPO)** of Probus Pleion Luxembourg S.A.

By post:

Data Protection Officer

Probus Pleion Luxembourg S.A.
2A, rue Jean Origer
L-2269 Luxembourg

You may also contact us using the contact details available on our website.

We undertake to respond to your request as promptly as possible and, in any event, within the time limits prescribed by applicable data protection legislation.

9. How Can You Lodge a Complaint?

If you believe that the processing of your personal data does not comply with applicable data protection legislation, we encourage you to contact us first so that we may review your concerns.

You also have the right to lodge a complaint with the competent supervisory authority, including:

Commission nationale pour la protection des données (CNPD)

15, Boulevard du Jazz
L-4370 Belvaux
Luxembourg

10. Updates to this Notice

This Notice may be amended from time to time to reflect changes in applicable legislation, regulatory requirements or our business activities.