

Protection of Personal Data and Confidentiality

Since May 25, 2018 with the entry into force of the Personal Data Protection Regulation "RGPD" within the European Union, the new Regulation governs the collection and use of personal data. EXTENDAM is responsible for complying with the data protection law in the context of the use of your personal data within the meaning of the provisions of Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016.

I. Definitions

1. Personal data :

Any information directly or indirectly identifying a natural person (e.g. name, registration number, telephone number, photograph, date of birth, municipality of residence, fingerprint ...). (Source: CNIL)

2. Processing of personal data:

Any operation, or set of operations, relating to such data, whatever the process used collection, recording, organization, conservation, adaptation, modification, extraction, consultation, use, communication by transmission, diffusion or any other form of placing available, reconciliation or interconnection, locking, erasure or destruction, ...) (Source: CNIL)

II. Personal data collected by EXTENDAM

EXTENDAM collects and processes the following personal data:

- 1. Information that you, or someone acting on your behalf, provides to Extendam.** This is information about you that you provide to Extendam by filling out forms, using services on our website, or communicating with Extendam by email or other means.
- 2. Information about you that Extendam collects or generates.** We also collect information about you when you use our services or when we correspond with you. Unless otherwise stated, the personal data transmitted to EXTENDAM are necessary and mandatory for the fulfillment and processing of your requests.
- 3. Information obtained by Extendam from other sources.** If we collect or receive your personal data in the course of providing our services, it is possible that we may receive information from third parties such as distributors, regulatory authorities, etc. This information may include your name, contact details, details of your financial and financial situation and other information relevant to the services we provide to our customers.

III. Uses of your personal data

The data is collected and processed to allow the management and administration of the subscription and more generally of the commercial relationship. If the subscription is

unsuccessful not your data may also be used for prospecting purposes (under subject to obtaining your express consent).

The information collected as part of the subscription is mandatory and required. Failing to be informed, no subscription can be taken account by EXTENDAM.

The processing allows EXTENDAM to:

- Activate and confirm the investment made by the subscriber
- Manage legal and regulatory information for the subscriber
- Send the subscriber the legal and regulatory information that it is required to make available to it
- Fulfill its legal and regulatory obligations with the supervisory authorities
- Respond to requests for information, advice or intervention received from the subscriber;

Data processing concerns:

- The subscribing natural and legal persons
- The legal managers of the subscribing natural or legal persons,
- Prospects for natural and legal persons,
- The legal managers of prospective natural or legal persons.

The categories of data processed are:

- Identification data (surname, first name, date and place of birth, nationality, corporate name, corporate form, RCS number, tax system, legal representative, etc.)
- Personal and / or professional contact details
- Mobile phone details
- Professional activity of the subscriber
- Family situation and matrimonial property regime
- Place of taxation
- Subscription amount
- Origin of funds.

The processing is carried out on the basis of article 6 (1) c / of the GDPR and falls under the legal and regulatory obligations to which EXTENDAM is held in its capacity as management company approved by the Autorité des Marchés Financiers (GP-13000002 du January 2, 2013) and approval under the AIFM Directive 2011/61 / EU.

The processing does not provide for automated decision-making.

Are recipients of all or part of the data:

- Authorized members of EXTENDAM
- To the competent authorities (in particular the tax administration), jurisdictions and regulatory authorities, if applicable
- To the Custodian or any other subcontractor established in France or within the European Union - in charge of processing personal data on behalf of Extendam for the purposes described above.

EXTENDAM is entitled to use your personal data on the basis:

- your consent: it is possible that we need (but this is not generally the case) your consent to use your personal data. You can withdraw your consent by contacting us on our website at "Contact Us" or by phone on 01.53.96.52.50 or by email at serviceclients@extendam.com
- the performance of a contract: we may have to collect and use your personal data to conclude a contract with you or to fulfill our obligations under a contract with you or with a customer to whom you are linked.
- of a legitimate interest: we can use your personal data in order to respond to our legitimate interests, some examples of which are presented above.
- compliance with the law or regulations: we may use your personal data in order to comply with applicable law / regulations

No transfer for commercial purposes is made.

IV. Storage period of your data

The Information collected as part of the subscription is kept by EXTENDAM for the duration of the subscription and five years after its closure.

The email address is kept:

- with regard to its private space, for the entire duration of its opening and five years after its closure,
- regarding the sending of information other than legal and regulatory to which EXTENDAM is required, throughout the duration of the subscriber's consent.

The information collected in the context of prospecting is kept for three years from the last action on the part of the prospect.

V. Rights of users over your personal data

You benefit from the following rights in application of the European regulation on the protection of personal data (2016/679) of April 27, 2016 applicable from May 25, 2018:

- Right of access to your personal data under the conditions provided for in article 15 of the aforementioned regulation.
- Right to obtain the rectification of your personal data under the conditions provided for by article 16 of the aforementioned regulation.
- Right to obtain the erasure of your personal data under the conditions provided for in article 17 of the aforementioned regulation.
- Right to obtain the limitation of the processing of your personal data under the conditions provided for in article 18 of the aforementioned regulation.
- Right to the portability of your personal data under the conditions provided for in article 20 of the aforementioned regulation.
- Right of opposition to the processing of your personal data under the conditions provided for in article 21 of the aforementioned regulation.

To exercise any of the above rights or if you have any questions regarding the collection and processing of your personal data, you can contact Extendam:

- to the following email address: serviceclients@extendam.com
- or by letter addressed to the Customer Service of Extendam, 79 rue La Boétie - 75008 Paris.

Contact details of the data protection officer (DPO): DPO, Extendam, 79 rue La Boétie - 75008 Paris.

Finally, we inform you that you have the right to lodge a complaint with the CNIL or any other competent supervisory authority.