

Personal Data Protection and Confidentiality

The General Data Protection Regulation (GDPR), which entered into force in the European Union on 25 May 2018, governs the collection and use of personal data. Extendam is responsible for complying with the law on the protection of personal data within the context of the use of your personal data and within the meaning of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016.

I. Definitions

1. Personal data

Any information by which a physical person can be directly or indirectly identified, e.g., name, registration number, telephone number, photograph, date of birth, place of residence, fingerprint, etc. (Source: *CNIL* - the French Data Protection Authority).

2. Personal data processing

Any operation or set of operations relating to such data, regardless of the procedure used (collection, recording, organisation, storage, adaptation, modification, extraction, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment, interlinking, blocking, erasure, or destruction, etc.) (Source: *CNIL*)

3. Cookies

A cookie is a sequence of information, generally small in size and identified by a name, that can be sent to your browser by a website you visit. Your web browser will store it for a certain amount of time and resend it to the web server each time that you visit the website again.

We use certain cookies on our website, www.extendam.com, which enable the site to function in the best possible manner (accessibility, authentication, security). The cookies' lifespan is limited to the duration of the browser session. You can technically block these cookies by using your browser's settings, but it should be noted that this may affect your experience on our website.

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 includes information about you that you give Extendam by filling in forms, signing up for services on our website or communicating with Extendam by e-mail or any other means.
- 2. Information Extendam collects or generates about you.** We also collect information about you when you use our services or when we correspond with you. Unless otherwise stated, the personal data communicated to Extendam is necessary and mandatory in order to perform and process your requests.

3. **Information Extendam obtains from other sources.** If we collect or receive your personal data in the context of our provision of services, we might receive information from third parties such as distributors, the regulatory authorities, and so on. That information could include your name, contact details, details about your financial situation, and/or other information relevant to the services that we are providing to our clients.

III. **Uses of your personal data**

The data is collected and processed to enable the management and administration of the subscription and, more broadly, the business relationship. If the subscription does not come to fruition, your data may also be used for marketing purposes (on condition that we obtain your express agreement).

The information collected within the scope of the subscription is mandatory and necessary. Should the information not be provided, the subscription may not be taken into account by Extendam.

The processing enables Extendam to:

- Record and confirm the investment made by the investor
- Manage the legal and regulatory information sent to the investor
- Send the investor the legal and regulatory information that it is required to place at the investor's disposal
- Fulfil its legal and regulatory obligations with respect to the supervisory authorities
- Respond to requests for information, advice or intervention from the investor

The processing of data concerns:

- Investors, in the form of natural or legal persons
- The persons legally responsible for the investors, whether natural or legal persons
- Prospective investors, in the form of natural or legal persons
- The persons legally responsible for the prospective investors, whether natural or legal persons

The categories of data processed are:

- Identifying information (first name, surname, date and place of birth, nationality, corporate name, type of company, RCS (trade and companies register) number, tax regime, legal representative, etc.)
- Personal and/or professional contact details
- Mobile number
- Investor's occupation
- Family situation and matrimonial regime
- Place of taxation
- Subscription amount
- Source of funds

The processing is carried out on the basis of Article 6 (1) c/ of the GDPR and is part of Extendam's legal and regulatory obligations in its capacity as an investment management

company authorised by French stock market watchdog, the *Autorité des Marchés Financiers* (AMF) (GP-13000002 of 2 January 2013) and the authorisation with respect to Directive AIFM 2011/61/EU.

The processing does not include any automated decision-making. All or part of the data may be sent to:

- The authorised members of Extendam
- The competent authorities (in particular the tax authorities), jurisdictions and regulatory authorities, where applicable
- The custodian or any other subcontractor established in France or the European Union responsible for processing personal data on behalf of Extendam for the reasons described above

Extendam is entitled to use your personal data on the basis of:

- your consent: we may (but usually do not) need your consent to use your personal data. You can withdraw your consent by contacting us through our website under the section entitled “*Contact*”, by phone at +33 (0)1.53.96.52.50 or by e-mail at serviceclients@extendam.com
- the performance of a contract - we may need to collect and use your personal data to enter into a contract with you or to perform our obligations under a contract with you or a client to whom you are connected.
- legitimate interest - we may use your personal data for our legitimate interests, some examples of which are given above.
- compliance with the law or regulations - we may use your personal data as necessary to comply with applicable law/regulations.

No data is transferred for marketing purposes.

IV. **Length of time your data is stored**

The information collected within the scope of the subscription is stored by Extendam for the entire term of the subscription and for five (5) years after closure thereof.

The e-mail address is stored:

- as regards user logins, for the entire time that it is in use and for five (5) years after the closure thereof,
- as regards the sending of information - other than the legal and regulatory information that Extendam is obliged to send - for as long as the investor gives his/her/its consent. Information collected for direct marketing purposes is stored for three (3) years from the time of the most recent action on the part of the prospect.

V. **Users’ rights with respect to personal data**

You have the following rights pursuant to the European General Data Protection Regulation (2016/679) of 27 April 2016, applicable as of 25 May 2018:

- Right to access your personal data under the conditions of Article 15 of the regulation.
- Right to obtain rectification of your personal data under the conditions of Article 16 of the regulation.
- Right to obtain erasure of your personal data under the conditions of Article 17 of the

regulation.

- Right to obtain the restriction of processing of your personal data under the conditions of Article 18 of the regulation.
- Right to the portability of your personal data under the conditions of Article 20 of the regulation.
- Right to object to the processing of your personal data under the conditions of Article 21 of the regulation.

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

- by e-mail at: serviceclients@extendam.com
- or by post at Service Clients d'Extendam, 79 rue La Boétie, 75008 Paris, France

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

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