

## DATA PROTECTION POLICY

This policy shall be applicable to personal data provided to Banco Inversis, S.A., Luxembourg Branch (hereinafter, “Inversis Luxembourg”), through the channels provided for this purpose by clients, as well by potential clients and third parties with whom Inversis Luxembourg has a relationship.

This Policy will provide the User with a transparent overview of Inversis’s data protection policies and with certain information required by the regulation notably on how the Client’s personal data will be processed in the context of the relationship.

### 1. CONFIDENTIALITY AND APPLICABLE SECURITY MEASURES.

The personal data provided shall be treated by Inversis Luxembourg with absolute confidentiality, in a loyal and transparent manner, in accordance with the laws in force at all times, undertaking to keep them secret, as well as to adopt the necessary measures to prevent their alteration, loss and unauthorized processing or access. To comply this, Inversis Luxembourg has the strictest security procedures and measures necessary to protect personal data, consistent with the state of technology, the nature of the data stored and the risks to which they are exposed.

### 2. IDENTITY OF THE CONTROLLER.

The Controller is Banco Inversis, S.A., Luxembourg Branch, a subsidiary bank authorised and supervised by the Financial Sector Supervisory Committee (CSSF) registered under number 427. It is registered with the Luxembourg Corporate and Trade Register with number B282596 and domiciled in 35a Avenue John F. Kennedy - L- 1855 Luxembourg.

For any questions in relation to the processing of the Client’s personal data or the exercise of its rights, please may contact the Data Protection Officer (“DPO”) via the postal address, or by email at [dpo@inversis.com](mailto:dpo@inversis.com)

### 3. CATEGORIES OF PERSONAL DATA

Personal Data processed by Inversis Luxembourg are obtained directly, unless it acts as data processor, in which case, Inversis Luxembourg receives the personal data by the controller and processes the personal data only on documented instructions from the controller.

Inversis Luxembourg may process any of the following types of personal data:

- official identification data: name, gender, title, date and place of birth, address (utility bill), contact details, identity card or passport information, sample signature;
- socio-demographic data;
- images when entering Inversis’s premises recorded under the video surveillance protection system.
- recordings of phone conversation:
- economic, tax and financial data: data pertaining to the contracting of specific services or products, including banking, financial, and transactional data; Details of bank or securities accounts, credit card numbers, cash transfers, type and quality of assets deposited with Inversis Luxembourg’s, investor profiles; Data regarding payments made with cards and, specifically, the location(s) of cash withdrawals and card payment)
- electronic identification information: IP Address, email address, e-signature.

The personal data provided by the interested parties are understood to be accurate and truthful, and it is the responsibility of the interested parties to notify Inversis Luxembourg immediately of any modification.

#### **4. PURPOSE, BASIS OF LEGITIMATION OF THE PROCESSING OF PERSONAL DATA AND RETENTION PERIOD.**

Inversis Luxembourg will process the Personal Data of its clients for the following purposes:

##### **4.1 Data processing on the basis of the (pre)contractual relationship.**

The Data Controller will process any personal data where processing is necessary in order to take steps at the request of the potential Client prior to entering into the contractual relationship; and processing is necessary to fulfil the obligations assumed and for the correct execution and development of the contractual relationship.

The personal data provided by the data subject will be retained for the duration of the contractual relationship and, once this period is finished, until the legally stipulated period of limitation of actions has expired

##### **4.2 Data processing to comply with a legal obligation.**

The Data Controller will process the personal data provided to comply with a regulatory obligation to which Inversis Luxembourg is subject. This includes the regulatory reporting, the fight against money laundering, market abuse, local and international tax compliance, responding to complaints or litigation; and, specifically, to:

- Incorporate personal data into the Inversis Luxembourg databases, to be able to duly identify the data subject, to comply with applicable tax and sectorial obligations.
- Communicate personal data to the Regulatory authorities, agencies and public officers such as the CSSF, Banque Centrale du Luxembourg, European Central Bank.
- Handling complaints and claims made to the Controller, in accordance with the applicable sectorial regulations.
- Exercise of the right of defense in judicial and extrajudicial proceedings initiated by Inversis Luxembourg or promoted by it.
- Management and resolution of complaints submitted through the channels provided by Inversis Luxembourg.
- Attention of requirements addressed by Judicial and administrative authorities including judges.

The personal data provided shall be stored for the legal period foreseen in each case and, once this period has expired, the data shall be securely deleted.

##### **4.3 The legitimate interest of INVERISIS.**

Legitimate interest is a legal basis that allows the processing of personal data by the Controller as long as the interests or the rights and freedoms of those affected by it do not prevail, taking into account their reasonable expectations with respect to the relationship with the Controller. Taking this into account, Inversis Luxembourg has analyzed the processing of personal data indicated below, having considered that it falls within the reasonable expectations of the data subjects, without infringing their rights and freedoms. In any case, and in accordance with current data protection legislation, the data subject may exercise the right to object these processing operations by sending an email to [protecciondedatos@inversis.com](mailto:protecciondedatos@inversis.com) or by requesting additional information from our Data Protection Officer, by contacting the address indicated above.

Processing is necessary for the purposes of the legitimate interests pursued by the Bank;

- Communication of personal data, when necessary, to other group entities for internal administrative purposes, this includes group controls and group synergies,
- Capture and recording images through video surveillance systems located in Inversis Luxembourg facilities, to guarantee the protection of people and assets.
- Recording of telephone calls to be able to accredit the correct execution of the orders and transactions agreed.
- Processing of the data of representatives and contact persons of organizations contractually linked to Inversis Luxembourg, as well as of professionals to establish and maintain a business relationship.

The personal data processed shall be preserved for the periods established to comply with the applicable legal obligations and, in the absence of this, for the time required to fulfil the purpose for which they were collected; after that time, they shall be securely deleted.

#### **4.4 Data processing based on the consent of INVERSIS.**

The Data Controller may request the consent of the data subject to carry out those personal data processing operations that so require, among others, the sending of commercial communications, when there is no other legitimate reason for doing so, activities to promote its image or brand or its inclusion in the Inversis Luxembourg databases for selection processes, for which purpose, data subject will be specifically informed, requesting their consent, which may be withdrawn at any time, through the channels provided for this purpose, in each case, or failing this, by sending an e-mail to [protecciondedatos@inversis.com](mailto:protecciondedatos@inversis.com). The personal data provided will be stored for the period necessary to fulfil the aforementioned purposes or until the withdrawal of data subject consent. After that time, they will be securely deleted.

## **5. RECIPIENTS OF THE PERSONAL DATA.**

We may share the personal information we collect from and about the Client with:

- Regulatory authorities, agencies and public officers such as the Commission de Surveillance du Secteur Financier “CSSF”, Banque Centrale du Luxembourg “BCL”, European Central Bank “ECB”;
- Judicial and administrative authorities including judges, financial intelligence unit “FIU” (cellule de renseignement du parquet) and direct tax administration, regulatory authorities of the United States of America, in compliance with the tax obligations established. In particular, we may disclose information relating to transactions carried out by US citizens;
- For administrative purposes and to prevent fraudulent conduct, customer data may be sent to other Inversis Group companies, third-party companies or centralised information systems.
- With Client’s consent, the data may be sent to the different companies belonging to the Inversis Group.
- External service providers who may access the personal data of customers to provide their services, including without limitation, lawyers, solicitors, auditors, or providers of consultancy services, advisory services, IT maintenance and development, physical security, video surveillance, administrative services;
- Inversis Luxembourg’s regulatory auditor (réviseur d’entreprise agréée);
- Custodian banks; credit institution and other service providers acting as correspondent banks introducer or tied agent who will have introduced the Client to Inversis Luxembourg.

## 6. TRANSFERS OF DATA.

In the course of our business activities, Inversis Luxembourg may transfer personal data to a third party located outside the European Economic Area (EEA) necessary for the proper performance of its services. Inversis Luxembourg transfers personal data to third countries declared as offering an adequate level of protection through a European Commission decision ('Adequacy Decision'), or in the absence of an Adequacy Decision, through the provision of appropriate safeguards, such as standard data protection clauses adopted by the Commission. If data transfer is not covered by an 'adequacy decision' or the appropriate safeguards, Inversis Luxembourg must conduct analyses of the transfer data to determine whether it is covered by exceptions set out in Article 49 of the GDPR.

## 7. RIGHTS OF THE INTERESTED PARTIES.

The data subject shall have the right to withdraw his or her consent at any time, as well as to exercise the following rights before the Controller:

- Right to access: the right to obtain from the Bank confirmation as to whether or not personal data concerning is being processed.
- Right to rectification: Right to ask for incorrect, inaccurate, or incomplete personal data to be corrected.
- Right to erasure: Right to request that personal data be erased when it's no longer needed or if processing it is unlawful.
- Right to data portability: under certain circumstances the Client may ask to receive the personal data, in a structured, commonly used and machine-readable format and the right to transmit those data to another controller.
- Right to object: If the data is processed for the performance of a task carried out for reasons of public interest, in the exercise of official authority or for the purposes of the compelling legitimate interests pursued by the controller or a third party, the data subject has the right to object to the processing on grounds relating to his or her particular situation.
- Right to restriction of processing: The data subject can request the controller to restrict the processing of personal data concerning him or her.
- Right not to be subject to a decision based solely on automated processing: The right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

The above-mentioned rights may be exercised by contacting the DPO to the following email address: [protecciondedatos@inversis.com](mailto:protecciondedatos@inversis.com), indicating the right to exercise, the processing of personal data concerning data subject, accompanied by a copy of the ID card. For any queries or complaints regarding the processing of personal data, the Client may contact our Data Protection Officer at the e-mail address provided above.

The Client is also informed of the existence of his/her right to lodge a complaint with the CNPD at the following address: 15, Boulevard du Jazz, L-4370 Belvaux, Grand-Duchy of Luxembourg; or with any competent data protection supervisory authority in their EU Member State of residence.