**Privacy Policy**  
**European Capital Partners (Luxembourg) S.A./ European Capital Partners (Luxembourg) S.A. Belgian Branch**

1. **Introduction**

European Capital Partners (Luxembourg) S.A. ("ECP", "we", "our") is committed to protecting your personal data and respecting your privacy. This privacy policy explains how we collect, use, share, and protect your personal data in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR"), the Luxembourg law of 1 August 2018 on the organisation of the National Data Protection Commission and the general data protection framework, and any other applicable national implementing laws and regulations (together, the "**Data Protection Regulation**").

1. **Data Controller**

ECP acts as the data controller for the personal data we process.

Our contact details are:

**European Capital Partners (Luxembourg) S.A.**  
153-155 B rue du Kiem, L-8030 Strassen, Luxembourg

Data subjects located in Luxembourg may also lodge a complaint with the Luxembourg data protection authority: The Commission Nationale pour la Protection des Données (CNPD)

Website : [www.cnpd.lu](http://www.cnpd.lu)

**European Capital Partners (Luxembourg) S.A. Belgian Branch**

Mechelsesteenweg 455, 1950 Kraainem

Email : compliance@ecp.lu

Data subjects located in Belgium may also lodge a complaint with the Belgian data protection authority:  
Autorité de protection des données / Gegevensbeschermingsautoriteit (APD/GBA)

Website: [www.autoriteprotectiondonnees.be](http://www.autoriteprotectiondonnees.be)

1. **Categories of Personal Data Collected**

We may collect and process the following categories of personal data:

* Identification information (e.g., name, date of birth, nationality, ID/passport number)
* Contact details (e.g., address, phone number, email)
* Financial data (e.g., account details, investment preferences)
* Employment and tax details (e.g., profession, tax identification number)
* KYC/AML data (e.g., source of funds, UBO identification)
* Communication records and documents you provide

1. **Purpose and Legal Basis of Processing**

Your personal data is processed for the following purposes:

* To fulfil contractual obligations (Art. 6(1)(b) GDPR)
* To comply with legal obligations, including AML/CFT, FATCA, CRS, EMIR and MiFID requirements (Art. 6(1)(c) GDPR)
* Based on your explicit consent for specific uses, including data reuse and onboarding (Art. 6(1)(a) GDPR)
* For legitimate interests, such as service improvements and administrative purposes (Art. 6(1)(f) GDPR), provided those interests are not overridden by your rights

1. **Sources of Data**

We collect personal data:

* Directly from you (e.g., onboarding forms, correspondence)
* From Eurinvest Partners S.A. with your explicit consent
* From public sources (e.g., commercial registers, sanctions lists)

1. **Data Recipients**

We may share your personal data with:

* Regulatory authorities (e.g., CSSF, tax and supervisory authorities)
* Auditors, legal and tax advisors
* IT and administrative service providers under appropriate confidentiality safeguards
* Data Processors as defined in our discretionary management agreements

1. **International Transfers**

Your data will generally be processed within the European Economic Area (EEA). If data is transferred outside the EEA, we will ensure that appropriate safeguards are in place in line with the Data Protection Regulation, such as Standard Contractual Clauses or adequacy decisions.

1. **Data Retention**

Your data will be retained as long as necessary for the purposes outlined in this policy or longer if required under applicable laws. Retention periods typically include:

* AML/KYC records: 5 to 10 years after termination of the business relationship
* Contractual documents: 10 years post-relationship, or longer if legally required

1. **Your Rights**

You have the following rights under the Data Protection Regulation:

* To access your personal data
* To rectify inaccurate or incomplete data
* To request deletion under lawful conditions
* To restrict or object to processing, including for direct marketing
* To request data portability
* To withdraw your consent at any time (without affecting prior lawful processing)
* To lodge a complaint with the above referenced supervisory authorities

1. **Security Measures**

We implement robust technical and organisational measures to secure personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. This includes restricted access, encryption, and data integrity monitoring.

1. **Updates**

This privacy policy may be revised periodically to reflect changes in our processing practices or legal requirements. The most recent version is always available at: [www.ecp.lu]

**Contact**  
For any queries or to exercise your data rights, please contact:

**Data Protection Officer**

Email: compliance@ecp.lu