



## DATA PROTECTION POLICY

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## **Preamble**

The protection of personal data is one of the priorities of Leleux Fund Management & Partners (hereinafter “the Company” or “LFM&P”). Technical and operational measures have been implemented to guarantee the security of personal data.

This Data Protection Policy (hereinafter the “Policy”) gives detailed information on the rules established relating to the protection of personal data.

This Policy relates to the activity of LFM&P as a UCITS management company operating in multi-management (i.e. investment in third-party UCI) and to the principle of proportionality regarding a smaller establishment with a simple structure, management model and target audience (institutional or professional).

The Company maintains independent working relationships within the enterprise (directors and employees), and relationships with service providers, third-party management companies and institutional investors.

It operates within the framework of the GDPR - the General Data Protection Regulation of April 2016 and the Privacy Act of 30 July 2018 - on the protection of natural persons with regard to the processing of their personal data.

## **1. Introduction**

LFM&P is responsible for the collection and processing of personal data in relation to our activities. The objective of this Policy is to inform about the type of data we collect and the reasons why this data is collected, used and shared, about the retention periods, protection of privacy rights and the way in which the owner of the data can exercise these rights:

- Type of personal data collected;
- Use of this data;
- Processing of the information;
- Sharing the data;
- Data retention.

## **2. Type of data**

We collect and use the following data in the course of our activities:

- Information about identification (e.g. surname, forename, ID card and/or passport, nationality, date and place of birth, etc.);
- Contact details (e.g. email address, telephone number, driving licence, access badge number, etc.);
- Information about payment methods (account numbers to make payments);
- Information about studies and the professional situation (e.g. level of study, Curriculum Vitae, photo, salary, etc.). ;

## **3. Use and processing of the data:**

The data is used for the following purposes:

- For the execution of a contract with a collaborator or with the company he represents or to take measures before concluding a contract;
- To comply with the legal and regulatory obligations to which we are subject, such as:
  - Responding to official demands from duly authorised public or judicial authorities;
  - Meeting the requirements of the other financial intermediaries with whom we work, mainly in the fight against money laundering and the financing of terrorism or MiFID;
  - Complying with the regulations related to social law;
  - Fulfilling our obligations in terms of the identification of our own company through its shareholders, managers and ultimate beneficiaries.
- To pursue a legitimate interest:

- Sending information about the financial instruments we manage;
- Sending press releases about our activities.
- We seek consent for some specific processing, for example:
  - If we have to carry out subsequent processing for a purpose other than those set out above;
  - For the use of digitalised photos or signatures in our possession.

#### **4. Sharing personal data**

With the aim of abiding by the aforementioned purposes, we only share personal data with the following entities:

- Staff and consultants in charge of contract management;
- Service providers for staff management (e.g. social secretariat);
- The financial partners with whom we maintain recurring business relationships;
- Certain regulated occupations (such as auditors, lawyers, etc.);
- The control authorities.

#### **5. Transfer of personal data outside of the European Economic Area**

The transfer of data to a country outside of the EEA, whose level of protection has not been recognised as adequate by the European Commission, may only take place if it is necessary for the execution of the contract (e.g. international payment) or if a mechanism guaranteeing the protection of your personal data has been established.

#### **6. Confidentiality of personal data**

Contracts concluded with our partners, themselves subject to confidentiality restrictions, have been checked so that LFM&P can be sure that systems have been established that comply with the General Data Protection Regulations.

In addition:

- Lists of staff and clients are not sold to or exchanged with anyone;
- We have reduced access to the personal data entrusted to us to those responsible for data processing (*need to know*) and for the execution of a contract;
- We have an internal policy that refers to the confidentiality of the data and the exclusively professional use that must be made of the data;
- We take appropriate measures to restrict access to the data via a *username* and *password*.

#### **7. Retention of personal data**

The retention period is the period of the contract (or of the contract concluded by your company) to which is added the legally prescribed period for claims in relation to this contract, provided there are no legal and regulatory derogating provisions stipulating a longer or shorter derogation period. When this period has expired, the data is deleted from our system.

## **8. Rights**

In accordance with the applicable regulations, the owner of the data has the following rights:

- Right of access: obtaining information relating to the processing of personal data, and a copy of the data;
- Right of correction: if the owner of the personal data considers them to be inaccurate or incomplete, he can ask for the data to be modified accordingly;
- Right to erase data: the owner of the data can request the deletion of the data within the limits prescribed by the law;
- Right to withdraw consent: When the owner of the data has given his consent for the personal data to be processed, he has the right to withdraw the consent at any time.

The other rights referred to in the GDPR (limitation, objection, portability) do not apply to the data collected by LFM&P.

If the owner of the data wishes to exercise one of these rights, he can send a letter by post to the following address:

- ✓ Leleux Fund Management & Partners SA  
Service délégué à la protection des données  
Rue Royale, 97  
1000 Brussels  
Belgium

Or by email to:

- ✓ [info@lfmp.be](mailto:info@lfmp.be)

Any such request should always be accompanied by a photocopy/scan of the owner's identity document so that we can identify the legitimate author of the request.

- ✓ In accordance with the applicable regulations, in addition to the rights mentioned above, the owner of the data also has the option of seeking information or submitting a request or claim to the Data Protection Authority (APD) in Belgium at:

[contact@apd-gba.be](mailto:contact@apd-gba.be) <https://www.autoriteprotectiondonnees.be/introduire-une-requete-une-plainte>

## **9. Monitoring the changes made to the Data Protection Policy**

In a context of constant technological development, we might have to modify this Data Protection Policy.

You can see the latest version of this Policy on line, and we will inform you of any changes on our website.



## 10. Contacting us

For all matters relating to the use of personal data, you can contact the data protection service

- ✓ Leleux Fund Management & Partners SA  
Service délégué à la protection des données  
Rue Royale, 97  
1000 Brussels  
Belgium

or

- ✓ [info@lfmp.be](mailto:info@lfmp.be).

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Document approved and validated by the Board of Directors of Leleux Fund Management & Partners -10/02/2019