

## **Data protection Privacy Notice**

We understand the special importance of your personal data protection, therefore we collect and process only the data that is necessary for the performance of our activities. We process personal data lawfully, transparently and fairly, for pre-determined purposes and only to the extent necessary to achieve the processing purposes. When we process personal data, we seek to ensure that it is accurate, secure, confidential, and properly stored and protected.

When processing your personal data, we adhere to the 2016 April 27 the requirements for the processing of personal data established by the General Personal Data Protection Regulation (EU) 2016/679 as of 27 April 2016 (hereinafter referred to as the GDPR), Law of 1 August 2018 on the Organisation of the CNPD and the General Data Protection Framework, and Amended Law of 30 May 2005 on Data Protection and Electronic Communications.

### **WHO ARE WE?**

1 asset management Luxembourg S.à r.l.  
Senningerberg Airport Moonar Centre  
Route de Trèves 6D (2nd floor)  
L-2633 Senningerberg, Luxembourg  
contact e-mail: lux@1am.lu.

In accordance with the provisions of legal acts, we are the controller of your personal data in the cases and to the extent provided for in this Privacy Notice.

### **WHAT PRINCIPLES DO WE FOLLOW?**

When processing your personal data, we:

- a) will comply with the requirements of the applicable legal acts, including GDPR;
- b) will process your personal data in a lawful, fair and transparent manner;
- c) we will collect your personal data for specified, clearly defined and legitimate purposes and will not continue to process it in a way incompatible with those purposes, except to the extent permitted by law;
- d) we will take all reasonable measures to ensure that that personal data that are not accurate or complete in terms of processing purpose, are processed, are rectified, supplemented, suspended or destroyed without delay;
- e) personal data is stored in such a way that your identification could take no longer than is necessary for the purposes for which personal data is processed;
- f) will not transfer or disclose personal data to third parties except as provided in the Privacy Notice or applicable legal acts;
- g) ensure personal data is processed in such a way as to ensure the proper security of personal data, including protection against unauthorised processing or processing of unauthorised data, and against accidental loss, destruction or damage by appropriate technical or organisational measures.

### **HOW DO WE COLLECT YOUR PERSONAL DATA?**

We process your personal data received by the following ways:

a) When you provide your personal data to us. You provide us with your personal data and other information by using the Website, visiting our Account, writing to us or communicating with our team, submitting your complaints and (or) inquiries, and etc.

We hereby inform that if you contact us in writing or by e-mail – we will save the correspondence data.

b) When you use any our Website and (or) our Account. When you use the Website and (or) visit our Account in social networks, specific information (such as your Internet address (IP), type of web browser used, number of visits or other) is collected automatically.

c) When we receive your personal data from other persons in accordance with the procedure established by legal acts and (or) this Privacy Notice. In cases where we do not receive data from the data subjects, we require to inform the data subjects about the processing of the relevant personal data (the purpose and other conditions and circumstances detailed in this Privacy Notice). Moreover, in cases when we receive personal data of the other data subject, we require to introduce the data subject to this Privacy Notice.

You will always be able to request the correction of incorrect personal data and the exercise of your other rights as a data subject defined in this Privacy Notice and applicable legal acts.

## **FOR WHAT PURPOSES AND HOW DO WE PROCESS YOUR PERSONAL DATA?**

The exact amount of personal data and the way we process it depends on the specific relationship between you and us. In order to improve the Website and offer better services personalized. We use your personal data, including the personal data we receive from you when using our Website, visiting our Account to improve and develop the Website and to offer you better and more personalized services. For this purpose we receive data from you through cookies when you use our Website and (or) from other sources (including, but not limited to, owners of social networks, their used cookies).

## **HOW DO WE USE COOKIES?**

We collect information about you using cookies and similar technologies. Cookies are small files that are temporarily stored on a hard drive of your device and allow to identify you during other visits of the Website, social networks, save your browsing history, options, customize content, speed up searches, create more convenient and friendly environment, and provide it more efficiently and reliably. Cookies are common website browsing practices that make it easier to use the website.

We use the information received from cookies:

- a) to ensure the functionality of the Website;
- b) to improve and develop the Website so it would better meet your needs;
- c) for development of services and analysis of the use of the Website;

You can give your consent to the use of cookies on our Website by clicking on the “I Accept” link in the link (bar) on the Website.

You can cancel your consent to use cookies at any time. You can do this by changing your web browser settings so that it does not accept cookies. How you do this depends on your operating system and web browser. You can find detailed information about cookies, their use and cancellation options here <http://AllAboutCookies.org> or [http://google.com/privacy\\_ads.html](http://google.com/privacy_ads.html).

In some cases, especially the switch off, disagreement with or deletion of technical and functional cookies may slow down the Internet browsing, restrict the operation of specific functions of the Website, block access to the Website.

## **WHOM DO WE PROVIDE YOUR PERSONAL DATA?**

We guarantee that your personal data will not be provided or otherwise transferred to third parties without a legal basis, nor will it be used for the purposes other than those for which they were collected. We will not transfer your personal data in any way other than as required by legal acts in accordance with this Privacy Notice. However, we reserve the right to provide information about you if we are required to do so in accordance with the procedure established by law or if required to do so by lawful authorities or prosecuting authorities.

## **HOW LONG DO WE STORE YOUR PERSONAL DATA?**

We store your personal data no longer than required for the purposes of the data processing or as provided by legal acts, if they provide for a longer retention period.

We strive not to store outdated, not relevant personal data, so only up-to-date information is stored when it is updated (for example, revised, changed, etc.). Historical information is stored if it is required in accordance with the procedure established by legal acts or for the performance of our activities.

## **HOW DO WE STORE YOUR PERSONAL DATA?**

The data we collect from you will be within the EU territory but may be transferred or stored outside the EU. They may also be processed by our employees or employees of our suppliers working outside the EU. When transferring your data outside the EU, we will take all necessary actions to ensure that your data is processed securely and in compliance with this Privacy Notice.

Unfortunately, the transfer of information through the Internet is not completely safe. Although we take every effort to protect your personal data, we cannot guarantee the security of your data when you transfer data to the Website - you assume the risks related to the transfer of data to the Website. When we receive your data, we will apply those legal procedures and security measures to protect your data against unauthorized access, unauthorized processing or disclosure, accidental loss, deletion, or destruction.

Should unlikely circumstances arise and we become aware of a breach of security of your personal data which could constitute serious hazard to your rights or freedoms, we will notify you immediately as soon as we become aware of it and determine what information has been accessed.

## **The Website uses a Letsencrypt.org SSL certificate.**

- a) Verified Website Identity (you are visiting the real domain owner's website and not being redirected to a hacked server).
- b) All data transmitted between the server and the browser is encrypted (network hackers can no longer read it).
- c) Data integrity and originality are guaranteed (routers on the way cannot correct or censor the information being transmitted).
- d) Click <https://letsencrypt.org> for more information.

## **WHAT RIGHTS TO YOU HAVE?**

When processing personal data, we guarantee your rights in accordance with GDPR. You shall have the following rights as a personal data subject:

- a) know (be informed) about the processing of your personal data;
- b) get acquainted with our personal data that we process;
- c) demand the correction or supplementation, adjustment of incorrect, inaccurate, incomplete personal data;

d) require the destruction of personal data when they are no longer needed for the purposes for which they were collected;

e) require the destruction of personal data if it is processed unlawfully or if you cancel or do not give your consent to the processing of personal data, which is necessary;

f) disagree with the processing of personal data or cancel a previously given consent;

g) require the suspension (except for storage) of your personal data processing in case of a dispute or verification of the lawfulness of the processing, the accuracy of the data, as well as in cases where we no longer need your personal data but you do not want us to destroy it;

h) require the submission, if technically possible, of your personal data collected with your consent or for the purposes of performing the contract in an easy-to-read format or request that they be transferred to another controller.

We will seek to guarantee the exercise of your rights as a personal data subject and to create all conditions for the effective exercise of these rights, but we reserve the right not to comply with your requirements when it is necessary to ensure:

a) fulfilment of the legal obligations imposed on us;

b) national security or defence;

c) public order, the prevention, investigation, detection or prosecution of criminal offenses;

d) important economic or financial interests of the state;

e) prevention, investigation and detection of violations of official or professional ethics;

f) protection of the rights and freedoms of you or others.

You may submit claims related to the exercise of your rights to us in person, by post or by electronic means. Upon receipt of your application, we may ask you to provide proof of identity as well as any additional information we require regarding your application.

Upon receipt of your claim, we will respond to you no later than within 30 calendar days from the date of receipt of your claim and the submission of all documents required to provide a response.

## **WHO CAN YOU COMPLAIN TO?**

If you wish to make a complaint about our processing of data, please submit it in writing, providing as much information as possible, using the contact details provided above. We will cooperate with you and try to resolve any issues promptly.

If you think that your rights have been infringed in accordance with the GDPR / other applicable personal data protection legislation, please direct your request to data protection responsible [privacy@1am.lu](mailto:privacy@1am.lu).

### **Changes to the Data Protection Privacy Notice**

This Data Protection Privacy Notice may be amended from time to time to ensure regular updates about the information collected and how the information is used. Upon amendment, the Data Protection Notice will be updated on our website.

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