EDMOND
DE ROTHSCHILD

JANUARY 2026

EDMOND DE ROTHSCHILD ASSET MANAGEMENT (LUXEMBOURG)

PERSONAL DATA PROTECTION CHARTER



1. Introduction

This Charter applies to all personal data (the "**data**") processed by Edmond de Rothschild Asset Management (Luxembourg) ("**we**" or "**us**"), acting as data controller, data processor or sub-processor[1] towards the **natural persons** whose data is processed in the context of its activities.

We collect data about you and are committed to protecting this information and your privacy. Set out below is an explanation of what, why and how we collect, use and safeguard your personal information.

This Charter applies, amongst others, where Edmond de Rothschild Asset Management (Luxembourg) processes personal data in connection with any services that we are engaged to provide to you or any company of which you are a member of or any company which engages us and provides us with your personal data ("**Services**").

The purpose of this Charter is to ensure the compliance of Edmond de Rothschild Asset Management (Luxembourg) with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons regarding the processing of personal data and on the free movement of such data (the "**GDPR**").

2. Which data do we process?

The data that we process may come from various sources.

Some data may be collected directly from you. Some data may also be collected, in compliance with the applicable laws and regulations, from other sources such as your employer or the entity on behalf of or for which you are acting, the clients, the prospects, the counterparties, the partners, the contact persons, the (potential) investors, the (potential) beneficial owners, the attorneys, the service providers, the promoters, the initiators or the other entities of the Edmond de Rothschild Group (the "**EdR Group**").

We may also collect data in the context of meetings or communications (e.g. throughout the paper or electronic correspondence, during phone conversations or meetings) or when you visit our website or use our online services or applications.

Some data may also come from publicly available sources and/or a third-party source (e.g. pursuit records, public registers, press, websites, social networks, global providers of financial, business and economic information such as Bloomberg, FACTIVA and World-Check databases) or from external companies (e.g. from investigation firms).

For example, we may carry out electronic verification checks or screening and/or may receive information about you from a public source or a third-party to verify your identity or check whether you are a politically exposed person, or subject to any financial sanction or as may otherwise be required by law or regulation.

Certain categories of data that may be processed by us, including but not limited to:

- Personal information, such as first name, surname, place and date of birth, gender, marital status, national and / or tax identification number, profession, title / function, tax status, source of wealth, banking details (including the account number and the account balance);
- Contact information, such as the private or professional address / contact details, the telephone number, e-mail address, postal address and/or other contact information;
- Identity details, such as identity card, passport, identity picture, specimen of signature, nationality, visa, residence permit;

[1] We draw the data subject's attention to the fact that Edmond de Rothschild Asset Management (Luxembourg) may also, as the case may be, act as processor (or sub-processor) when it processes the data directly (or indirectly) on behalf of distinct controllers. The duties of the processor towards the controller will be specified in a contract or another legal act.

- Other information in the context of the relationship with us, such as the type of investor, the knowledge, the origin of the funds, the record of transactions (including the transactional behaviour), potential convictions or sanctions, complaints, copies of invoices and/or any other data processed in accordance with the applicable legal and/or regulatory requirements;
- Information in the context of communication and/or meetings, such as data provided in paper or electronic correspondence, telephone and video recordings, pictures and/or any other relevant data in the context of communication and/or meetings;
- Information in the context of the visit of our website and/or the use of our online applications/services, such as the data provided in written or electronic forms (e.g. contact information, function or title, the name of the entity on behalf of or for which the you are acting), online identifier (address IP), data traffic records, login details and/or any data provided by communicating with us through our website or via social media.

You need to ensure that your data, as collected by us, is accurate, relevant and up to date. You are required to inform us of any changes concerning your data.

3. Why and how do we use your data?

The processing of your data is carried out on the basis of one or more of the following legal grounds, as provided for under the GDPR.

Therefore, we will only process your data in the following cases:

- ***Where we have a legitimate interest***

  We may use and process your personal information where it is necessary for us to pursue our legitimate interests as part of our business for the following purposes:

  - Entering into and/or managing relationships with you as prospects, clients, counterparties, service providers, entities of the EdR Group and/or other third parties;
  - The provision of products and services;
  - Benefiting from services;
  - Improvement of our products and services;
  - Marketing purposes (including the organisation of marketing events and management of the related invitations);
  - Risk management (in particular regulatory, legal, financial and reputational risks);
  - The detection and prevention of fraud and other criminal activities;
  - The verification of the accuracy of data that we hold about you;
  - The exercise or defence of our rights or the rights of other natural or legal persons;
  - The disclosure to our processors in order to process it on our behalf;
  - The security of the persons and of the assets, including the management of the accesses to our premises;
  - The network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
  - Facilitating the settlement of any disputes or litigations (telephone conversations, videoconferences with and/or instructions given to us may be recorded);
  - The request from you in connection with the exercise of your rights;
  - The assessment and improvement of our service to customers through recordings of any calls; and
  - The management of queries, complaints or claims.

- ***In connection with a contract for services with you***

    - We will use and process your personal information where we require this in connection with our Services (or where you are in discussions with us about any new service).
    - We will use this information in connection with our contract with you for the supply of those Services, (or when it is needed to enter into the contract); and so that we can communicate with you in relation to those Services (including notifying you of any changes to our Services).

- ***Where it is necessary to comply with a legal obligation***

    We may use, store and share your information where we are under a legal obligation to do so.

    This may include a use of your information:

    - To verify your identity (including electronic checks or screening);
    - To prevent the risks and the occurrences of cases of fraud, of money laundering, of terrorism financing and of other financial crimes;
    - To satisfy accounting and reporting obligations;
    - To prevent conflicts of interest; and/or
    - To comply with the legitimate requests emanating from, and the requirements of, local or foreign authorities or administrations.

    In connection with this, we may collect information in the public domain relating to any criminal activity or allegation of criminal activity. We may use this information in the substantial public interest in the detection or prevention of unlawful acts or in protecting the public against dishonesty, or for on suspicion of terrorist financing and money laundering. Any information of this type will be subject to appropriate safeguards with regards to security and to ensure your rights are protected.

- ***For any other specific purposes to which you have consented,*** *such as :*

    - *The use of non-essential cookies*
    - *Direct marketing*
    - *Event registration.*

    Not providing data for the above mentioned purposes may result (to the extent applicable) in the impossibility for us (i) to enter into a relationship with you as client or as prospect, service provider, counterparty, EdR Group entity or other third party, and/or (ii) to accept or execute your subscription or redemption, and/or (iii) to provide our services or products, and/or (iv) to authorise the use of our online services or applications, and/or (v) to continue our relationship with you as client or as prospect, service provider, counterparty, EdR Group entity or other third party.

4. Recording of communications, conversations and video surveillances

For the purpose of serving as evidence of commercial transactions and/or any other commercial communications, telephone conversations, videoconferences, instructions given to us, minutes of meetings, letters, messages and any other communications may be recorded in accordance with the applicable laws and regulations.

We use a video surveillance system in and around our offices for security reasons and we may therefore record videos in which you may appear. A detailed privacy notice is available upon request from our data protection officer (cf. section 9 of the present Charter) and/or at the reception.

These recordings shall not be disclosed to any third parties, unless we are compelled or entitled to do so under the applicable laws and/or regulations, in order to achieve the purpose previously mentioned in this paragraph.

5. Who do we share personal information with?

We will only disclose your personal data in accordance with applicable laws and regulations. We may disclose your data to the following third parties:

- Other entities of the Edmond de Rothschild Group (EdR Group entities);
- Delegates and service providers engaged by us to help us running our business and perform the Services;
- Other partnerships / partners and financial institutions, external auditors or consultants, tax authorities, professional associations, financial supervisory authorities; and
- Any other persons that may require disclosure on legal grounds.

Some of these third parties (EdR Group entities and service providers) may be outside of a country where the information was collected or where you reside. We will ensure that prior to any such transfer outside of your country that adequate safeguards are in place to ensure compliance with data protection obligations (in particular, the requirements set out in Chapter V of GDPR).

6. How long will we store your information for?

We generally hold your personal data in our systems for as long as necessary to achieve the relevant purpose.

By way of example and without limitation, the retention period may begin to run from the date on which you cease to use the Services or from the termination of our Agreement, including in connection with legal or regulatory proceedings.

In general, the retention period is 10 years. However, the data storage periods may be shorter or longer, in compliance with guidelines or recommendations published by national supervisory authorities as well as the applicable laws and/or regulations , in particular in order to enable us to comply with our legal and/or regulatory obligations, to manage claims and/or litigations, to exercise or defend our rights or those of any other person and/or to meet authorities' requests.

If your personal data are anonymised, the GDPR no longer applies, as the information can no longer be used to identify you directly or indirectly. Therefore, we may use such information without further notice to you.

7. Data Security

We implement appropriate technical and organizational measures depending on the nature of the personal data and the risks associated with its processing, to ensure the confidentiality, availability and integrity of such data.

8. Your rights

In accordance with GDPR requirements, you may exercise the following rights by contacting our data protection officer using the contact details listed at section 9 “Contacting us”.

- Right of access - You have the right to know if we are using your information and, if so, the right to access it and information about how we are using it. Your personal information will usually be provided to you in writing, unless otherwise requested. Where you have made the request by electronic means, the information will be provided to you by electronic means where possible.

- Right of rectification - We take reasonable steps to ensure that the personal information we hold about you is accurate and complete. However, if you do not believe this is the case, you have the right to require us to rectify any errors in the information we hold about you.

- Right to erasure - You have the right to require us to delete your information if our continued use is not justified. However, this will need to be balanced against other factors, depending upon the type of personal information we hold about you and why we have collected it, there may be some legal and regulatory obligations which mean we cannot satisfy your request.

- Right to restrict processing - In some circumstances, you may be entitled to limit the purposes for which we can use your information and therefore, restrict the processing of your data.

- Right of data portability - You have the right to require us to provide you with a copy of the personal information that you have supplied to us in a commonly used machine-readable format or to transfer your information directly to another data controller (e.g. a third-party offering services competing with ours).

- Right to object to the processing of your personal data – You have the right to request us to stop processing your personal data in certain situations (e.g., in the context of direct marketing).

- Right not to be subject to automated-decision making – We do not make decisions about you using automated decision making or profiling of your personal data.

- Right to withdraw consent - For certain limited uses of your personal information, we may ask for your consent. Where we do this, you have the right to withdraw your consent at any time.

- Right to lodge a complaint - You have a right to lodge a complaint with your local data protection supervisory authority if you consider that your personal data have not been processed in compliance with the applicable data protection legislation.

In some circumstances, exercising some of these rights will mean that we are unable to continue providing you with part or all of the Services.

You can make any of the requests set out above using the contact details in this Charter. Please note that in some cases we may not be able to satisfy your request for reasons such as our own obligations to comply with other legal or regulatory requirements. We will always respond to any request you make and if we can't satisfy your request, we will tell you why.

9. Contacting us

For any queries concerning the processing of data described under this Charter or to exercise the above-mentioned rights, you may contact us at the following address:

4, rue Robert Stumper, L-2557 Luxembourg, Grand Duchy of Luxembourg, to the attention of our data protection officer.

Our data protection officer may also be contacted at the following email address:

EDRAMLUXCONFORMITE@edr.com

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*This Charter may be amended from time to time.

The latest applicable version of this Charter is available online at the following address:

https://www.edmond-de-rothschild.com/media/hyedkhbg/dataprivacynoticeedramluxembourg-en.pdf