

## Privacy Policy

For obtaining information in relation to Palladium Fund 1870 MANAGEMENT S.C.A. SICAV-SIF, the Owner has to collect some Personal Data from its Users (any natural person using the Website and requiring information).

This document can be printed for reference by using the print command in the settings of any browser.

### Owner and Data Controller

Palladium Fund 1870 MANAGEMENT S.C.A. SICAV-SIF (the "Fund")

58, rue Charles Martel

L-2134 Luxembourg

Owner contact email: [contact@palladium-fund.com](mailto:contact@palladium-fund.com)

### Types of Data collected

Among the types of personal data ("Data" or "Personal Data") that the Owner collects, by itself or through third parties, there are: first name; last name; company name, designation, phone number; email address; country of residence, consent for data collection.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User (please note that Usage Data and Cookies might be collected while using the website [www.palladium-group.com](http://www.palladium-group.com). For any information in this respect, please see the [>>>Privacy Policy of www.palladium-group.com](http://www.palladium-group.com)- the "Website").

Unless specified otherwise, all Data requested by the Owner is mandatory and failure to provide this Data may make it impossible for the Owner to provide its services and to provide information in relation to the Fund. In cases where the Owner specifically states that some Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Users are responsible for any third-party Personal Data obtained, published or shared through the Website to the Owner and confirm that they have the third party's consent to provide the Data to the Owner.

### Mode and place of processing the Data

#### Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of the Website (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

#### Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing ("opt-out"), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;

- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;

Processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In this respect, our legitimate interests are:

- to comply with obligations or internal policy requirements of the Fund and the AIFM,
- to inform you about our investment products and services,
- to monitor or improve our relationships with you and other potential investors,
- to keep our internal records and ensure a proper organization of our operations,
- to protect our business against fraud, breach of confidence, theft of proprietary materials, and other financial or business crimes,
- to monitor communications to/from you using our systems,
- processing personal data of your employees if you are a legal person,
- to protect the security and integrity of our IT systems,
- to send direct marketing communications and to provide you with information in connection with the Fund or similar products and services.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

#### **Place**

The Data is processed at the Owner's operating offices and in any other places within the EU, where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

#### **Retention time**

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until at least 5 years after such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be

obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

## **The purposes of processing**

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Contacting the User, Displaying content from external platforms, Interaction with external social networks and platforms, Analytics and Hosting and backend infrastructure.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

## **Detailed information on the processing of Personal Data**

Personal Data is collected for the following purposes and using the following services:

- **Enabling the Fund to provide specific information to Users**
- **Analytics**
- **Contacting the User**
- **Displaying content from external platforms**
- **Hosting and backend infrastructure**
- **Interaction with external social networks and platforms**

## **The rights of Users**

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right, under certain circumstances, to obtain the erasure of their Personal Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.

- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority or with the *Commission Nationale pour la Protection des Données* (CNPD).

#### **Details about the right to object to processing**

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

#### **How to exercise these rights**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

#### **Cookie Policy**

The Website uses Trackers. To learn more, the User may consult the [Cookie Policy](#).

#### **Additional information about Data collection and processing**

##### **Legal action**

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Website or the related Services.

The User declares to be aware that the Owner may be required to reveal Personal Data upon request of public authorities.

##### **Additional information about User's Personal Data**

In addition to the information contained in this privacy policy, the Owner may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

##### **Information not contained in this policy**

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

##### **Changes to this privacy policy**

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.