

**Privacy policy
of Phoenix Solutions Luxembourg
(the “Company”)**



Contents

- I. Protection of personal data..... 3
 - A. The data collected (managers, employees, etc.)..... 3
 - 1. Use of personal data to provide services to our clients..... 4
 - 2. Use of the personal data of our employees..... 4
 - 3. Use of personal data in connection with our activities..... 4
- II. Sharing of personal data 4
- III. Our internal policy with regard to your personal data 4
 - A. Your Company’s data that might contain personal data..... 5
 - B. Inside information 5
- IV. Transfer of data to a country outside the European Economic Area (EEA) 6
- V. Storage of personal data 6
- VI. Your rights..... 6
- VII. Contact us 7

Phoenix Solutions Luxembourg attaches particular importance to the protection of personal data.

Our confidentiality and personal data protection policy concerns our Company's clients, direct business relations, service providers and employees.

As controller of the collection and processing of your personal data, we are responsible for the use of your personal data in connection with our activities.

We only use these data in connection with our activities. The aim of this policy is to inform you about the processing of your personal data, their protection and your rights concerning your data.

I. Protection of personal data

We collect your personal data directly (e.g. when you contact us) and indirectly (e.g. when one of your employees contacts us).

A. The data collected (managers, employees, etc.)

We collect and use personal data to comply with our regulatory obligations and in connection with our business activities. In this respect, we collect the following data:

- Personal identifying data (name, address, phone number).
- Official identifying data (ID card and passport numbers).
- Personal details (date and place of birth, nationality).
- Electronic identifying data (email addresses, electronic signature).
- Data relating to education, training and qualifications (level of education, professional qualifications).
- Professional and employment data (job, employer's name, salary).
- Bank data (bank account details).

1. [Use of personal data to provide services to our clients](#)

We use your personal data to provide the services which you have requested.

2. [Use of the personal data of our employees](#)

We use the personal data of our employees to comply with our obligations.

3. [Use of personal data in connection with our activities](#)

We use your personal data to conduct our business activities:

1. To comply with legal and regulatory requirements;
2. To conclude a contract with you or enter into contact with you, at your request;
3. To respond to requests and notifications from the competent authorities, as required by law;
4. To protect our offices, IT infrastructure and furniture (including monitoring access and its use).

II. [Sharing of personal data](#)

In connection with our activities, and to enable us to conduct our business, your personal data may be shared with the following parties:

- Service providers/suppliers providing services on our behalf;
- Supervisory, financial, tax, judicial and administrative authorities and State agencies, public bodies, at their request and to the extent authorised by the regulation;
- Certain regulated professions, such as lawyers, notaries and corporate auditors.

III. [Our internal policy with regard to your personal data](#)

Our employees will ensure that the information concerning the Company, its clients and other stakeholders (counterparties, subcontractors, shareholders, directors, etc.) is kept confidential. Inside the company, they will adhere to the need to know principle and the procedure of erecting Chinese walls between independent functions.

To that end, employees will strictly comply with the duty of confidentiality and discretion with regard to clients.

They will not disclose data collected relating to a client or the client's operations to a third party, unless legally required to do so. They will carefully manage client data to prevent any inappropriate disclosure of such data, including within the institution. They will not exploit or use client data for purposes other than those for which such data were communicated, in accordance with the rules on the protection of personal data, including the principles of transparency and clients' right of access to their data.

A. Your Company's data that might contain personal data

The data that we use relating to your Company (its strategy, its activities, etc.), its employees and third parties will be processed in accordance with the same duty of discretion. We have data protection measures in place to ensure compliance with the duty of discretion and professional secrecy.

This protection takes different forms, inter alia:

- We undertake that we will only discuss files with parties that need to know such information in the normal course of their business within/in favour of your Company;
- We undertake to systematically store processed files and not to leave them out in the open and/or to lock up confidential documents (clean desk policy);
- We undertake not to leave documents on printers, photocopiers, etc.;
- We undertake to protect confidential files through passwords;
- We undertake to ensure the confidentiality of meetings/discussions (closed meeting rooms, no discussions in public places and in particular on public transport).

B. Inside information

Our employees will be particularly attentive to inside information concerning companies or financial instruments listed on a regulated market or elsewhere. Inside information is defined as:

- Information not made public (communication, press, etc.);
- Information of a precise nature (concrete);
- Information made public that might influence the price of the company's shares or the financial instrument or a related instrument.

When an employee has access to inside information, he or she must not disclose such information other than in the normal course of his or her duties. Otherwise, he or she would commit an offence of insider trading punishable under criminal law.

Employees who leave the Company are required to respect the confidential or privileged nature of the information to which they have had access, even after their departure and with no time limitations.

IV. Transfer of data to a country outside the European Economic Area (EEA)

The Company does not transfer your data to a country outside the EEA.

If your data have to be transferred to a country outside the EEA, such a transfer will be made on the basis of a decision handed down by the European Commission, after having recognised the country to which the data will be transferred as having a level of protection equal to that in the EEA.

In the event of a data transfer to a third country, we will introduce contractual clauses approved by the European Commission to ensure the protection of your data.

V. Storage of personal data

Pursuant to our regulatory obligations, your personal data are stored for a period of five years from the end of the business relationship.

VI. Your rights

In accordance with Regulation EU 2016/679 on data protection and the regulatory obligations to which we are subject, you are entitled to exercise the following rights:

- Right of access (article15);
- Right to rectification (article16);
- Right to erasure/right to be forgotten (article17);
- Right to restriction of processing (article18);
- Right to data portability (article20);
- Right to object (article 21).

If you wish to exercise your rights, you can write to us or send an email to the addresses mentioned in point VII.

In order to ensure that your request is efficiently handled and to avoid disclosing your personal data to an ill-intentioned person, please include a copy of your ID document (in paper or .pdf format) to enable us to identify you.

VII. Contact us

If you have any questions concerning the processing of your personal data, or if you want to exercise your rights, please contact us:

- By email to: contact@phoenixsolutions.lu
- By phone : 20 80 01 20 1
- By post:

Phoenix Solutions Luxembourg

2, rue de l'Eau

L-1449 Luxembourg

Luxembourg