



Personal Data Protection Policy

iM Global Partner SAS
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INTERNAL

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1. Introduction

iM Global Partner and its teams are very attentive to the protection of privacy and personal data. We pay special attention to all our business processes.

The Personal Data Protection Policy describes how we process the personal data of legal representatives, employees, agents and contact details for our customers, prospects and business partners.

This document is made available to employees and published on the company website.

2. Context

The Regulation on the protection of individuals with regard to the processing of personal data and the free movement of such data, and repealing Directive 95/46 / EC (General Data Protection Regulation) entered into force May 25, 2018

The reform of data protection has three objectives:

1. Strengthen the rights of individuals, in particular by creating a right to the portability of personal data and provisions specific to minors;
2. Empower the data actors (processors and subcontractors);
3. Increase regulatory awareness through enhanced cooperation between data protection authorities, including the possibility of adopting joint decisions when data processing is transnational and increased penalties

In accordance with the regulations in force, and in particular with the General Data Protection Regulation n ° 2016/679 of April 27th, 2016, the information that you communicate to IM Global Partner or that we collect is described in this document.

You can contact the services of the Data Protection Officer (DPO) by email or post: compliance@imgp.com or IM Global Partner - personal data protection unit - 5 rue Royale- 75008 Paris

3. Data Use

The data that we collect as part of our investment and mutual fund management services are used by IM Global Partner for all or some of the following purposes:

- Tracking the liabilities of our mutual funds
- The administrative and / or accounting management of the assets placed in the UCIs managed by our company
- Recourse and claims management
- Investment services provided to you
- Execution of the legal, regulatory and administrative provisions in force

We also collect your data as part of the operations relating to the management of our customers and commercial prospecting, in particular:

- Operations related to customer management (customer relationship monitoring)
- The development of trade statistics
- Information for our customers and prospects about our products and services
- Management of requests for rights of access, rectification and opposition

In order to comply with our legal and regulatory obligations, we also collect your data to fight against money laundering and terrorist financing, as well as against insurance fraud.

4. Legal basis

4.1. Execution of contracts or legal commitments

It may be necessary for us to process your personal data in order to execute a contract with you regarding our portfolio management company activity or related ancillary services. It may be necessary for the continuation of our regulated activity, or to take measures at your request before concluding a contract. In addition, more generally when the use of your data is necessary to meet our obligations under a contract with your company or investment services rendered to your benefit, within the framework subscription of one of the UCIs managed by our management company.

4.2. Compliance with our legal and regulatory obligations

As a portfolio management company, we are subject to a number of legal and regulatory obligations that may require us to collect, store or disclose personal data, without limitation for the following purposes:

- Fight against money laundering and terrorist financing (AML),
- Customer Knowledge (KYC)
- Regulatory or tax obligations: tax or regulatory authorities and other public authorities (including outside the territory of the French Republic).
- More generally, compliance with our obligations as a portfolio management company.

The use of your data may be necessary to serve our legitimate interests for:

- Relationship management with customers and suppliers
- Business analysis and product and service development
- Information security and building safety activities
- Monitoring of electronic communications for commercial and compliance purposes
- Evaluating, bringing or defending legal claims
- Marketing and management of IM Global Partner's financial products
- Audits

4.3. Categories of data we collect

Depending on the purposes described above, we collect the following data relating to your identification:

- ID: these include your names, first names and title
- Contact information: this includes your mailing address(es), phone numbers (landline and mobile), and email address(es)
- Tax residence: knowing tax residence enables us to determine our possible obligations, particularly tax obligations, to the State of which the beneficiary is a national but also in terms of social levies.
- Data relating to your economic and financial situation.

5. Recipients

We may have to communicate your data to the following categories of recipients (without limitation):

- The authorized members of our personnel and any natural or legal person authorized by IM Global Partner to process personal data
- If applicable, courts concerned, arbitrators, and/or mediators
- The ministries concerned, supervisory authorities and all public bodies authorized to receive them
- Transfer agent, auditors of our UCI

- Departments responsible for controls such as auditors as well as the departments responsible for internal control.
- Delivery Settlement Systems

These recipients may be located outside France.

Data transfers outside the European Union

iM Global Partner and its clients and counterparties are active worldwide and data may therefore, in accordance with the objectives described above, be transferred to EU countries or to third countries, that is, outside the EU or EEA.

The laws of third countries regarding personal data may not be as complete as the laws applicable in the territory of the French Republic and the EU. However, if iM Global Partner uses service providers in a third country, it requires them to apply the same level of protection to your data as that applicable in the EU. Typically, we do this by using standard data protection clauses approved and published by the European Commission for this purpose. More generally, we will transfer your personal data to a third country only in a manner authorized by the French law on data protection.

6. Data Retention

We store your data for no longer than is necessary for the purposes for which it is processed. The durations that we apply are summarized in the following table:

- Commercial prospecting: 3 years from the collection of data by the controller or the last contact from the prospect
- Contracts: 10 years after the due date or termination
- Regulatory data: 5 to 10 years
- KYC / AML: Fight against money laundering and terrorist financing: 5 years after cessation of relations with the person concerned

7. Security

iM Global Partner implements all technical and organizational measures to ensure the security of the processing of personal data and the confidentiality of personal data.

Thus, given the nature of the data and its processing, iM Global Partner takes all the necessary precautions to preserve the security of the data, prevent it from being distorted, damaged, or to allow unauthorized third parties to have access to it. These precautions include physical protection premises, authentication processes with personal and secure access via confidential identifiers and passwords, logging of connections, and encryption of data where required.

8. Your rights

In accordance with the regulations in force, you have the right to:

- Access to/copies of the data we hold about you
- Update outdated or incorrect data
- Delete some data we hold about you
- Limit the way we process and disclose some of your data for legitimate reason
- Transfer your data to a third-party service provider
- Withdraw your consent for treatment based on this legal basis at any time, it being understood that the exercise of this right does not affect the lawfulness of the treatment based on the consent granted prior to its withdrawal.

If you want to exercise your right please contact compliance@imgp.com
We will review all requests and respond to you within the legal deadlines.

Please note, however, that certain data may be excluded from these requests in certain circumstances, including whether we must continue to process your data to serve our legitimate interests or fulfil a legal obligation. We may ask you to provide us with proof to confirm your identity before responding to your request.

In accordance with the provisions of Article L. 561-45 of the Monetary and Financial Code, the right of access to processing implemented for the sole purpose of applying the provisions to counter money laundering and the financing of Terrorism is exercised with the CNIL. The CNIL can be contacted via an indirect right of access procedure by writing to the address detailed below. The treatments used to identify persons subject to an asset-freeze measure or a financial penalty remain subject to the right of direct access procedure with the controller.

The CNIL can be contacted at the following address:
3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07