



Personal Data Protection Policy

iM Global Partner SAS

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INTERNAL

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1. Definition

GDPR Regulation	the General Data Protection Regulation (GDPR) is an EU regulation 2016/679 of the European Parliament and of the Council of 27 april 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)
The Company	iM Global Partner
Personal Data	any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
Third party	a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;
Personal data breach	may result in physical, material or non-material damage to natural persons such as loss of control over their personal data or limitation of their rights, discrimination, identity theft or fraud, financial loss, unauthorised reversal of pseudonymisation, damage to reputation, loss of confidentiality of personal data protected by professional secrecy or any other significant economic or social disadvantage to the natural person concerned.
Consent	means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
Cookies	is "mini files" that can be placed on a device connected to the Internet, such as a computer, phone, tablet or smart TV. Cookies can be used to collect or store information about how the data subject behave on (a website) and/or on their device. By "reading" these cookies, the websites that set them can then retrieve the information stored in them.

2. Introduction

iM Global Partner SAS is very attentive to the protection of privacy and personal data. The company pays special attention to all its 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.

3. 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

Any data collected is processed lawfully, fairly and in a transparent manner in relation to the data subject.

In accordance with the regulations in force, and in particular with the General Data Protection Regulation, the information that you communicate to iM Global Partner SAS or that we collect is described in this document.

You can contact the services of the Data Protection Officer (DPO) by email: eucompliance@imgp.com

4. Data Use

The data that we collect as part of our investment and mutual fund management services are used by the Company 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.

All data register describing the data we process and the purpose of the process is available at the following folder: I:\07 - COMPLIANCE & LEGAL\13 - GDPR\iMGP GDPR registers

5. Cookie and other tracker policy

5.1. Purpose

A cookie can be used to recognise a visitor when they return to the website, to remember the preferred language chosen on a previous visit.

The use of cookies can have significant privacy implications if they are used for other purposes, such as tracking and profiling users in order to provide them with targeted advertising, so consent is essential. For more information, you can read our privacy policy which specifies how the company iM Global Partner SAS collects and processes the personal data of the users of website: <https://www.imgp.com/en/pages/data-privacy-policy>

6. Legal basis

6.1. 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.

6.2. 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 and/or the Grand Duchy of Luxembourg).
- 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

6.3. 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.

6.4. Procedure in case of data breach

For avoidance of doubt, the Company will not disclose in any way the personal data to any third party not related to the Companies policy and the provision of the coverage and services provided for therein, unless required by law or upon a lawful request or order by a public authority. The Company will not disclose the personal data to third parties to be used in commercial promotional activities, without the prior explicit Consent of the data subject.

In case of a personal data breach, as soon as the compliance department becomes aware that a personal data breach has occurred as specified in the GDPR Regulation, the compliance department should notify the personal data breach to the supervisory authority without undue delay and, where feasible, not later than 72 hours after having become aware of it, unless the controller is able to demonstrate, in accordance with the accountability principle, that the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where such notification cannot be achieved within 72 hours, the reasons for the delay should accompany the notification and information may be provided in phases without undue further delay.

The controller must notify the data subject of a personal data breach, without undue delay, where the breach is likely to result in a high risk to the rights and freedoms of the individual, in order to allow the controller to take the necessary precautions.

The communication shall contain the nature of the breach as well as recommendations with a view to mitigating the potential negative effects. Such communications shall be made in close cooperation with the supervisory authority. It should be checked whether all appropriate technological and organisational protection measures have been implemented to establish immediately whether a breach has occurred

7. Your rights

In accordance with the regulations in force, you have the several rights.

- Right to access to/copies of the data held: you may request access to your personal data.
- Right to rectification: you may ask the Company to correct Personal Data that is incorrect or incomplete.
- Right to erasure: you can ask the Company to erase Personal Data, following a templated that you can find <https://gdpr.eu/right-to-erasure-request-form/>, where one of the grounds applies:
 - if the personal data is no longer necessary in relation to the purposes for which it was collected,
 - if you withdraw consent on which the processing is based;
 - if you object to the automated decision-making and there are no overriding legitimate grounds for the processing, or you object to the processing for direct marketing;
 - if the personal data has been unlawfully processed;
 - if personal data have to be erased in accordance with any legal obligation to which the Companies are subject.
- Right to object: you can limit the way we process and disclose some of your data for legitimate reason. To do so, you can contact the Compliance department
- Portability: you can transfer your data to a third-party service provider.
- Withdraw of Consent: you can withdraw our 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 rights, please contact eucompliance@imgp.com

We will review all requests and respond to you within the legal deadlines mentioned in 6.4.

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

8. 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 the Companies 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
- 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.

9. Data transfers outside the European Union

The Company 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 France and EU. However, if the Companies use 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 France law on data protection.

10. 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

11. Security

The Company implement 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, the Companies take 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.

12. Update

iM Global Partner SAS does not commit on an annual review of this policy as it will be updated when necessary.