



LA FINANCIERE DE L'ECHQUIER

## **PERSONAL DATA PROTECTION POLICY**

La Financière de l'Echiquier, a portfolio management company incorporated under French law, is attentive to the protection of the personal data of its clients, employees and partners. Please find below all the information necessary to understand how your personal data may be processed in accordance with the General Data Protection Regulation which came into force on 25 May 2018.

### **1. Definitions**

**Personal Data:** means any information that can be used to identify directly or indirectly a natural person.

Example: name, email address, telephone number, postal address, etc.

**Processing of personal data:** means any operation, whether automated or not, involving the collection, use, storage, transmission and handling of personal data.

Example: collection of data as part of the account opening process, sending reports to clients.

**Controller:** means the person within the portfolio management company who is responsible for identifying the various processing operations using personal data and who determines the purposes of each such operation (Hereinafter the "Controller").

**Processor and/or service provider:** means any natural person or legal person that processes personal data only on documented instructions from and on behalf of the Controller. The processors and service providers are themselves bound by an obligation to ensure the security and confidentiality of personal data so that such data are protected and correctly processed.

### **2. The portfolio management company's undertakings**

The personal data that we collect are adequate, relevant and limited to what is necessary for the purposes for which they are processed. They are not used for any purposes other than those for which your data were initially collected.

Furthermore, we undertake not to keep your data for longer than is necessary for the processing for which they were collected, or for longer than the periods specified either in the

standards and authorisations of the French Data Protection Authority, namely the "Commission National Informatique et Libertés" (hereinafter the "CNIL") or laid down in law.

Moreover, please be advised that we only disclose your data to the service providers and partners that need them in connection with our activities and contractual and regulatory obligations, and subject to their compliance with applicable data protection regulations.

Lastly, we undertake not to sell any personal data to third parties.

### **3. Purposes of the processing of personal data**

We process your personal data to achieve the following purposes:

- **The performance of a contract to which you are a party and/or to take steps prior to entering into a contract**  
Example: Collection of your personal data for the conclusion of a contract of employment.
- **Compliance with legal and/or regulatory requirements**  
Example: Collection of personal data in connection with portfolio management services in order to adapt the investment strategy to the client/investor's profile.
- **In the pursuit of our legitimate interests**  
Example: Collection of personal data necessary for the smooth running of external events (SRI conferences, etc.) in order to communicate with clients and prospects.
- **Personalisation of communications and events proposed to clients**  
Example: Questions asked about your centres of interest with a view to preparing theme-based conferences (golf, sailing, etc.). These conferences or other events are related to our business relationship with you. The questions asked on such occasions remain exceptional and are subject to the data subject's consent.
- **Exercise or defence of legal claims**

### **4. Personal data collection sources**

We collect and receive personal data:

- **Directly from the data subjects.**  
Example: future clients who send us precontractual documents and/or prospects who ask us for information and visit our website.
- **Indirectly from external sources.**  
Example: publicly available sources, such as UN or EU lists of sanctions.

### **5. Cookies**

A cookie is a text-only string of information that a website stores in a file on your computer so that the website can recognise you during subsequent visits and remember certain information about you.

Our website uses three types of cookies:

- **Strictly necessary cookies:** these cookies enable you to navigate around our website and use its features, such as access to secure areas.
- **Performance cookies:** these cookies collect information on how visitors use a website. For example, the most popular pages visited and whether visitors receive error messages from web pages. These cookies do not collect any information that can be used to identify you. They are used in order to improve the user experience of a website.
- **Functionality cookies:** these cookies enable the website to remember user choices, such as usernames, language preferences and regions and can be used to propose more personal, advanced features.

Our website does not use either targeting or advertising cookies.

Moreover, you can deactivate cookies by altering the settings of your Internet browser.

## **6. Sharing of personal data**

Personal data may be shared with one or more of the following third parties when necessary or relevant for achieving one or more of the purposes specified in the paragraph entitled "Purposes of the processing of personal data":

- Public and governmental administrations, competent authorities, etc.  
Example: Financial Markets Authority
- Financial market participants  
Example: account-keeping institutions
- Auditors or legal advisers  
Example: Lawyers
- Processors and service providers  
Example: Customer relationship management (CRM) software

These various parties are themselves bound by legal and regulatory constraints and, in some cases, by contractual obligations to comply with the rules on the processing of personal data.

## **7. Storage of personal data**

Your personal data are processed only during the period necessary for the purposes specified in the paragraph entitled "Purposes of the processing of personal data". After that period the personal data are deleted subject to applicable legal and regulatory requirements regarding storing them for a longer period.

## **8. Security measures**

La Financière de l'Echiquier implements physical and organisational IT security measures in order to protect the personal data stored in its databases.

The processors and service providers themselves have an obligation to ensure the security and confidentiality of personal data so that they are protected and correctly processed.

Any incident having an impact on the confidentiality of personal data is notified to the CNIL in accordance with regulatory requirements.

## **9. The exercise of your rights and contact with the Controller**

To the extent and under the conditions authorised by regulations in force, you can exercise at any time your rights of access, rectification and deletion with regard to your personal data, as well as your rights to object to and restrict processing, by sending an email to **contact\_rgpd@lfde.com**

If you are dissatisfied with the reply to your request to exercise your rights, you may refer the matter to the CNIL ([www.cnil.fr](http://www.cnil.fr)).

- **The right of access** consists in asking us for access to the personal data that we hold concerning you and receiving a copy of such.
- **The right to rectification** consists in requesting us to rectify your personal data if they are inaccurate.
- **The right to erasure** consists in requesting us to erase your personal data when the processing of such is no longer necessary to achieve at least one of the purposes specified in the article entitled "Purposes of the processing of personal data", or is no longer lawful, subject to the minimum storage periods specified in the article entitled "Storage of personal data".
- **The right to object** consists in requesting us to no longer process your personal data, unless we have compelling, legitimate grounds for doing so. Example: exercise of a legal or contractual obligation, the pursuit of our legitimate interests and/or the exercise or defence of legal claims.
- **The right to restriction of processing** consists in requesting us to restrict the processing of personal data whose accuracy is disputed or if their processing is unlawful.