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Data Privacy Policy

Anaxis (hereinafter “Anaxis” or “we”) is particularly committed to respecting data privacy and has adopted strong principles to that effect.

To the extent that the European General Data Protection Regulation applies (hereinafter “the GDPR”, REGULATION (EU) 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), the present Data Privacy Policy provides you with detailed information relating to our use and protection of your personal data.

The purpose of this Data Protection Policy is to let you know:

- if you may be concerned by the personal data we collect,
- which type of personal data we may collect,
- how and by whom personal data may be collected,
- the purposes for processing personal data,
- with whom we may share personal data,
- to what extent we may have to transfer personal data outside the EEA,
- how long we keep the personal data,
- your rights regarding your personal data and how to exercise them.

As a general observation, this policy should be read keeping in mind that the type of personal data we collect, and the way we use it, may differ depending on your profile. Further information may also be provided where necessary when you apply for a specific product or service. If you have any questions relating to your particular situation, feel free to contact us.

I. Key principles

Anaxis AM, SIREN No. 523 455 350, is responsible for collecting and processing your personal data in relation to our activities. Its registered office is located at 9 rue Scribe, 75009 Paris (France).

Personal data are:

- processed lawfully, fairly and transparently in relation to the data subject,
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes,
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed,
- accurate to the best of our knowledge and, where necessary, kept up to date; every reasonable step is taken to ensure that any personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

II. Who is concerned by personal data in relation to our activity?

The personal data collected and processed by Anaxis in relation to our activity may concern natural persons being, or working for (hereinafter referred as “data subjects” in accordance with the GDPR):

- Clients,
- Business prospects,
- Counterparties/brokers,
- Service providers/agents,
- Regulatory authorities,
- Employees, executive directors and shareholders,
- Job applicants,
- Website visitors,
- Event attendees.

In certain circumstances, we may also collect information about you where you do not have a direct relationship with us. This may happen, for instance, when your employer or an Anaxis client/counterparty provides us with information about you as a co-borrower, guarantor, legal representative, authorized signatory, ultimate beneficial owner, landlord, liquidator, company shareholder, agent, etc. (non- exhaustive list).

III. Which personal data do we collect about you?

We may collect, depending on the nature and/or the context of our relationship with you, various types of personal data, including the following:

- Identification information such as name, ID card/passport numbers, nationality, place of birth, date of birth, gender, photograph, authentication data, web browsing data (IP, cookies, etc.),
- Contact information, such as e-mail address, postal address, phone number,
- Employment and educational information (current and/or background) such as employer’s name, function, seniority, business address, remuneration, level of education, schools or universities attended,
- Financial and tax information such as financial knowledge/experience, assets, investment objectives, risk appetite, bank account details, mandates, beneficial owner status, tax status,
- Data relating to your habits, preferences and personal situation with the exception of specific sensitive data within the meaning of the GDPR (see below): use of our products and services including financial and transactional data,
- Miscellaneous other personal data, such as marital status, number of children, driver’s license, membership in clubs or associations, interests/hobbies, etc.

IV. By whom and how is your personal data collected?

The data we collect about you may be directly provided by you, at our request or on your own initiative via such means as:

- Electronic forms (e.g. client questionnaire, application form, etc.),
- Web forms (e.g. website contact form),
- Other media used for interacting with Anaxis (e.g. e-mails, calls, websites, meetings).

It may also be obtained from other sources in compliance with law and regulations, including but not limiting to:

- Public databases (e.g. Trade registers),
- Private databases (e.g. canvassing lists),
- Web content (e.g. corporate websites),
- Counterparties or transaction stakeholders (e.g. advisor),
- Service providers/agents (e.g. fund administrator, custodian).

V. On which legal basis and for what purpose do we use your personal data?

According to Article 6 of the GDPR, personal data processing is lawful only if and to the extent that at least one of the following applies:

- 1) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract,
- 2) processing is necessary for compliance with a legal obligation to which the controller is subject,
- 3) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data,
- 4) the data subject has given consent to the processing of his or her personal data for one or more specific purposes,
- 5) processing is necessary in order to protect the vital interests of the data subject or of another natural person,
- 6) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Regarding the nature of our activities, the purposes of our personal data processing would fall under legal bases (1), (2), (3) or (4).

The paragraphs below describe the main types of data processing that we may perform depending on their legal basis.

(1) Performance of an existing or upcoming contract with the data subject

We may use your personal data to enter into and perform our contracts with you, including to:

- Evaluate if we can offer you a product or service and under which conditions,
- Execute transactions and conduct daily operations,
- Provide you with information regarding our products and services,
- Assist you and answer your requests,
- Manage the human resources of the company.

In some cases, the provision of personal data may be a prerequisite for concluding or performing the contract with the data subject.

(2) Processing necessary for compliance with a legal obligation

We may use your personal data to comply with various legal and regulatory obligations, including:

- Knowledge of our customers, counterparties, providers,
- Prevention of money-laundering and financing of terrorism,
- Prevention of tax fraud,
- Prevention of corruption,
- Supervision of staff ethics,
- Staff training and awareness-raising,
- Recording and traceability of transactions and client data,
- Disclosures to regulatory authorities or in statutory documentation regarding certain functions,
- Human resources management and related administrative formalities regarding labor law,
- Corporate management and related administrative formalities regarding corporate law.

In some cases, the provision of personal data may be a prerequisite for maintaining the relationship with the data subject.

(3) Legitimate interests

We may use your personal data to meet legitimate interests, such as:

- Ensuring the security of our information systems,
- Ensuring business continuity,
- Finding new clients,
- Developing our products or services,
- Advertising our products or services,
- Improving our general quality of service,
- Facilitating internal communication and interactions.

(4) Consent given by the data subject for specific processing

In some cases, we may require your consent to process your data, for example:

- When the personal data we hold about you is likely to be used to provide you with commercial offers to which you might subscribe as an end customer (“B2C” relationship) and not within a corporate context (“B2B”),
- Where the processing leads to automated decision-making, which produces legal effects, or which significantly affects you. At that point, we will inform you separately about the process involved, as well as the significance and the projected consequences of such processing,
- If we need to carry out further processing for purposes other than those above, we will inform you and, where necessary, obtain your consent.

VI. With whom may we share your personal data?

In order to achieve the above objectives, but subject to applicable law and regulations relating to information sharing, we may, depending on your data subject profile, disclose your personal data to third- party entities, including:

- Service providers or agents: distributors, fund administrators, transfer agents, data providers, orders management system providers, brokers, advisory companies, custodians, IT providers, messaging hosts, web hosts, internet service providers, etc.
- Counterparties or other stakeholders involved in fund transactions and investment services such as accounting agents, advisory companies, law firms, rating agencies, external valuation agents, etc.
- Third-party entities associated with our clients: banks, fiduciary agents, etc.
- Financial, taxation, regulatory or judicial authorities, state agencies or public bodies, upon request and to the extent permitted by applicable law and regulations,
- Certain regulated professionals such as lawyers, notaries or legal auditors.

VII. To what extent may we transfer personal data outside the EEA?

In certain specific circumstances, including access by certain employees to our financial data and order management system provider’s terminal, or the execution of international payments relating for instance to a subscription or a fund transaction, personal data may be transferred outside the European Economic Area (EEA).

In case of international transfers originating from the European Economic Area (EEA), to a non-EEA country, where the European Commission has recognized a non-EEA country as providing an adequate level of data protection, the personal data would be transferred on this basis.

For transfers to non-EEA countries where the level of protection has not been recognized as adequate by the European Commission, we would either rely on a derogation applicable to the specific situation (e.g. if the transfer is necessary to perform our contract with you such as when

making an international payment) or implement standard contractual clauses approved by the European Commission to ensure the protection of the personal data.

VIII. How long do we keep your personal data?

We will retain your personal data for the longer of the following:

- the period required by applicable law or regulations,
- any other period necessary for us to meet our operational obligations, such as: proper account maintenance, facilitating client relationship management, or meeting legal claims or regulatory requests.

Most personal data collected in relation to a specified client is retained for the term of the contractual relationship with such client plus a specified number of years after the end of the contractual relationship, or as otherwise required by applicable law or regulations.

If you want further information on the period for which your personal data, given your specific data subject profile, would be kept or the criteria used to determine that period, please contact us.

IX. What are your rights and how can you exercise them?

Depending on the data protection laws or regulations which apply to your situation, you have certain rights in respect of your personal data.

If your rights regarding personal data are governed by the GDPR, you have the following rights:

Right to access: you can request information relating to the processing of your personal data, and access to such personal data,

Right to rectify: you can request the rectification of inaccurate personal data concerning you,

Right to erase: you can request the erasure of your personal data by the data controller, to the extent permitted by law and regulations,

Right to restrict: you can request the restriction of the processing of your personal data,

Right to data portability: where permitted by law and regulations, you can request to have your personal data returned to you or, where technically feasible, transferred to a third party,

Right to object: you can object to the processing of your personal data, for reasons relating to your particular situation. You can object to the processing of your personal data for direct marketing purposes, which includes profiling related to such direct marketing,

Right regarding automated individual decision-making: you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you,

Right to withdraw your consent: where you have given your consent for the processing of your personal data, you have the right to withdraw your consent at any time.

In addition, you are also entitled to file a complaint with the competent supervisory authority.

If you require further information, or if you wish to exercise the rights listed above, please contact us.

X. Data Protection Policy review and updates

The present Data Protection Policy is reviewed on a regular basis and may need to be updated from time to time.

We invite you to review the latest version of this notice online and we will inform you of any material changes through our website or through our other usual communication channels.

XI. Contact us

If you have any question relating to our use of your personal data regarding your particular situation as data subject feel free to contact us:

- by letter at:
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9 rue Scribe
75009 Paris FRANCE
- by e-mail at pgiailevra@anaxis-am.com
- or by phone at +33 9 73 87 13 21.

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