

Data Protection Policy

The Firm FELTEN & Associés commits to doing all it can to protect their contact persons' privacy.

1) Collection of Personal Data

When liaising with FELTEN & Associés, personal data might be collected either from you directly or indirectly, enabling the firm to process such data for the purposes described hereinafter. The requested personal data might be the following:

EXAMPLES OF REQUESTED DATA – DO NOT FILL OUT THESE FIELDS

➤ Last Name
➤ First Name
➤ Nationality
➤ Contact Language
➤ Place (city + country) and day of birth
➤ Private address
➤ Business address
➤ Profession
➤ How you have been introduced to Felten & Associés (by a firm member, recommended by a client, ...)
➤ Home phone number
➤ Office phone number
➤ Cell phone
➤ Fax
➤ E-mail
➤ Family Status /Marital Status /Matrimonial Regime
➤ Person to liaise with if we do not hear from the client any longer
➤ Copy of a valid ID card
➤ Bank details (IBAN account number)
➤ VAT Number

2) Obligation to Provide the Firm with the Requested Data and Consequences if We Are not Provided with the Requested Data

From a deontological and regulatory point of view, we may not and cannot work for people who refuse to provide us with the requested information.

3) Purposes of Personal Data Processing

By providing FELTEN & Associés with your personal data, you expressly authorize us to process (collect, record, store, organize, structure, retain, adapt, edit, extract, view, use, disclose by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction) your data for the following purpose(s):

- Enabling the effective fulfilment of the mission which was entrusted to the firm FELTEN & Associés,
- Recording and storing your data in our electronic file,
- Answering your questions, responding to and fulfilling your inquiries and/or requests for advice,
- Ensuring the follow-up and management of your file,
- Complying with the legal obligation to identify our clients (KYC) pursuant to the amended law of November 12, 2004 on anti-money laundering and fight against the financing of the terrorism
- Ensuring the invoicing of our services and the appropriate follow-up by our accounting department,
- Passing on our electronic communications and invitations to events
- Referencing when submitting our application file to be ranked with professional organisations or legal directories such as *Chambers & Partners* and *Legal 500* or for any other marketing purpose complying with the lawyer's ethics to which the firm is subject.

Initial:

4) Storage of your Personal Data

Please refer to item 9 of our General Terms and Conditions providing for that unless otherwise agreed, the Association handles the filing which consists in keeping the whole file (correspondence, court records, documents) for a five-year period from the date of its closing. It is also possible for the client to consult or have a copy of all or part of the file at their own expenses during the five-year period. Once the period has ended, the file will be entirely destroyed, unless otherwise requested by the client.

Once our mission has been completed within the framework of your file and our fee has been paid, electronic data are archived.

FELTEN & Associés makes sure personal data which are collected are relevant, appropriate, reasonable and not excessive in proportion to the purposes for which the data are processed. Collected personal data are retained only for the period of time necessary to the purpose for which data are processed, unless our activity legally requires the retention of such data.

5) Personal Data Transmission to Third Parties

With your prior consent, while complying with the lawyer's obligation to respect professional secrecy, your personal data collected by FELTEN & ASSOCIES might be disclosed in whole or in part to your advisors, bankers, service providers, to the prosecutors, within the framework of defense of your interests, including in legal proceedings and/or in case of co-operation with a colleague on cross-border matters or issues.

6) Consent from the Data Subject regarding their Personal Data Processing

We encourage you to sign this document to indicate you are willing to give your free, specific, informed and unambiguous consent regarding the processing of your personal data such as described in this Data Protection Policy.

Should your personal data be transmitted to any third party out of the European Union, FELTEN & Associés undertakes to have such a non-EU Member State provide a similar level of personal data protection or to have the third data controller sign a contract with standard contractual clauses provided for by the European Commission in order to comply with Directive 95/46/EC.

7) Your Data Protection Rights

Upon request to the Data Controller, FELTEN & Associés, 2 rue Jean-Pierre Brasseur, L-1258 Luxembourg, by email to dataprotection@feltenlawyers.com, any Data Subject whose personal data are processed by FELTEN & Associés has the following rights:

- Right to be informed.
- Right to withdraw his or her consent easily at any time.
- Right of access by the Data Subject: the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed.
- Right to request the rectification: The Data Subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her.
- Right to request the erasure/right to be forgotten: The Data Subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay.
- Right to restriction of processing.
- Right to data portability.
- Right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions.
- Right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her
- Right to lodge a complaint with the supervisory authority.

Initial:

8) IT Security regarding your Personal Data

In order to ensure IT security regarding your personal data, they are hosted in Luxembourg Tier IV Data Centers. FELTEN & Associés chose Support PFS (Professionals of the financial sector), highly secured IT service providers:

- Undertaking to take all useful precautions to preserve security of data processed by FELTEN & Associés and to prevent data from being damaged, misrepresented or accessed by non authorised third parties.
- Implementing appropriate solutions to reduce the risk of computer sabotage, intrusion, hacking, data theft and loss.

9) Applicable Law

Any dispute arising from or in connection with Data Protection is governed by the laws of Luxembourg with regard to their validity, interpretation, enforcement and termination. The Luxembourg-City courts shall have sole jurisdiction over such disputes arising from or in connection with Data Protection.

I acknowledge having perused this Data Protection Policy and hereby agree on the herein contained clauses.

Date:

Signature: