

General Data Protection Regulation – Data Protection Web Policy

Samarang Asset Management S.A. (Samco) may process your Personal Data in confidence and in accordance with the requirements of the General Data Protection Regulation.

1. Data Protection – Key definitions and principles

GDPR: the General Data Protection Regulation (EU) 2016/679 is an EU regulation on personal data protection and privacy. GDPR achieves the uniformity in the data protection rules applicable to all individuals within the European Union.

Personal Data: any information related to an identified individual or that may allow to directly or indirectly identify an individual (e.g. name, phone number, job title). Personal Data does not include any information or data related to legal entities (e.g. investment funds, securities issuers...).

Processing: any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means (e.g. collection, recording, organization, storage, consultation).

Data controller: the person or entity that determines the purpose and means of the processing of the Personal Data.

2. Scope of Policy

The present Data Protection Web Policy (the “**Policy**”) only explains how and why Samco collects and uses your Personal Data when:

- You use Samco’s website (the “**Website**”) or any functionalities available on the Website; and
- You request the sending of information from Samco.

In both cases, Samco acts as data controller.

3. Processing of your Personal Data

3.1 Use of the Website

When you use the Website or any functionality of it, Samco collects and processes your Personal Data as follows:

- *Collection of your Personal Data:* Your Personal Data are collected through cookies (text files which are stored on your computer by your browser), through the information received from your browser, and/ or when you log in to dedicated or personalized pages of the Website.
- *Personal Data collected by Samco:* Samco will collect your IP address, the pages of the Website you visit, the duration and time of your visit as well as in some cases, your name, address, phone number and/or email address.
- *Processing of your Personal Data:* Samco will process your Personal Data for:
 - Manage and operate the Website, and
 - Any further use of your Personal Data, out of that context, will require another specific consent.

3.2 Communications

When you request the sending of information by Samco, Samco collects and processes your Personal Data as follows:

- *Collection of your Personal Data:* Samco will collect your Personal Data when you request the sending of information.
- *Personal Data collected by Samco :* Samco will solely collect the data you provide when you send an email, that is to say your name, first name, , email address and in some cases your phone number(s).
- *Processing of your Personal Data:* Samco will process your Personal Data for the sole purpose of handling your request and provide you with an appropriate answer.

Any further use of your Personal Data, out of that context, will require another specific consent.

4. Storage of your Personal Data

Samco takes reasonable and appropriate technical and organizational security measures in order to:

- Store your Personal Data in secure databases or systems with restricted access,

- Protect your Personal Data against loss, accidental or intentional misuse, alteration, destruction and access by unauthorized persons.

Samco will notify you without undue delay in the event Samco becomes aware of any unauthorized or improper use, access or disclosure of the Personal Data, which is likely to result in a high risk to your rights and freedoms.

Please kindly note that some of the databases or systems used by Samco for mailing services and storage systems may be hosted and/or maintained by third party service providers located inside or outside of the European Union. Your Personal Data will only be disclosed to such service suppliers if Samco has deemed, in its reasonable opinion, that such service providers offer appropriate guarantees with regard to confidentiality, security and protection of your Personal Data.

Samco also reserves the right to disclose Personal Data to any court, judicial or administrative authority when required or legally compelled to do so.

5. Retention Period

Samco will retain your Personal Data in accordance with the legal retention periods applicable in Luxembourg or where required for Samco to assert or defend against legal claims until the end of the relevant retention period or until the claims in question have been settled.

Your Personal Data will be deleted when:

- It is no longer reasonably required for the purpose the Personal Data were initially collected for,
- You withdraw your consent (where applicable); or
- Samco is not legally required or otherwise permitted to continue storing your Personal Data.

6. Your right to access, correct and request the deletion of your Personal Data

You have the right to access, modify, correct and/ or request the deletion of your Personal Data at any time as well as to restrict or oppose to the use of your Personal Data for the purposes mentioned above including:

- *For communications sent by Samco* : You may withdraw your consent to receive communications at any time by sending an email to info@samarang.lu. In that case, Samco will immediately cease to send you communications.
- *For the use of the Website*: you may have, at any time, the option to either accept or refuse cookies on the Website by changing the settings of you browser. However, if you choose to refuse cookies, you may not be able to access and use certain portions of the Website. You may also encounter difficulties or restrictions when accessing whole or part of the Website for which Samco disclaims any liability or responsibility of any kind.

If any of the Personal Data that you have provided to Samco changes or becomes no longer up-to-date, you should send an email to info@samarang.lu. Samco will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete Personal Data that you provided.

7. Amendment to the Policy

The Policy may be amended, replaced or supplemented at any time and without prior or further notice by Samco . You are therefore advised to review it from time to time for any possible changes.

8. Contact

Please feel free to send any queries or requests related to the processing of your Personal Data by Samco , in the context described above, to info@samarang.lu.