

Privacy Notice

Introduction

Renta 4 Luxembourg S.A. (the "IFM" or "we"), is an investment fund manager authorised by the Luxembourg supervisory authority, i.e. the Commission de Surveillance du Secteur Financier ("CSSF"), as a management company pursuant to Chapter 15 of the Luxembourg law of 17 December 2010 on undertakings for collective investment (hereinafter "UCI Law") and as an alternative investment fund manager pursuant to article of the Luxembourg law of 12 July 2013 on alternative investment fund managers (hereinafter "AIFM Law").

Within the scope of its regulatory authorization, IFM manages funds that qualify as undertakings for collective investment in transferable securities ("UCITS") or Alternative Investment Funds ("AIF"). In this context, the IFM is responsible, as a controller, for the processing of your personal data in relation to its activities.

The IFM is committed to protecting the privacy and security of your personal data. The following statement sets out our privacy practices and defines how we process your data as part of conducting our business.

It covers the following:

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1. What information is classed as personal data?

Personal data refers to any information about you and which can be used to identify you directly or indirectly. This includes but is not limited to: name and surname, home address, email address such name.surname@company.com, nationality, profession, tax identification number (TIN), Identification Card number, “Politically Exposed Person” status, criminal convictions, etc.

2. What personal data do we collect?

We collect and use the following categories of personal data in the framework of our activities:

- Contact information such as first name, last name, postal address, (business) telephone, fax number, e-mail address;
- Personal information such as nationality, gender, age, date of birth and place of birth;
- Government issued identifiers such as passport, identification card, tax identification number, national insurance number;
- Financial information such as bank details;
- Tax domicile and other tax-related documents and information;
- Products and services you hold with us, as well as have been interested in and have held;
- Origin of funds and assets where appropriate;
- Financial situation and knowledge and experience in investment matters where appropriate;
- Personal information that you provide by filling in forms on our website or using our contact details (this includes: name, surname, email address)
- If you contact us by email, any records of these exchanges;
- Data technically transmitted when you access or browse our website, notably obtained through the use of cookies (including date and time of access, language preferences, IP address, operating system used, number of visits, pages of our website you have visited, etc.).

3. How do we collect personal data?

We collect personal data either directly from you when you engage us to provide services or through your use of our website, or indirectly from other members of the Renta 4 Group, our clients, delegated third parties, providers of independent or background checks or publicly available sources.

By using our website or otherwise contacting us, obtaining services from us or by providing your personal data to us via contact form options on our website, you acknowledge that you have read and understood this Notice.

4. Who has access to personal data?

Access to your data is strictly limited to staff of IFM with the necessary authorization granted to them for the performance of their tasks (this includes authorized personnel of delegated third parties with whom we work in the course of providing our services). We continuously educate and train our staff on how to protect your personal data.

5. How do we process personal data and why?

Your personal data is processed, where such processing is necessary:

- To provide you with information or other services that you have requested from us (processing is necessary for the performance of a contract with the data subject);
- To deal with communications that you send to the IFM and responding to your queries, requests and complaints
- To fulfil our legal obligations namely in respect to AML/KYC
- To carry out the recruitment process
- To manage the infrastructure and business operations, arrange the contractual documentation needed to offer and/or obtain suitable services, and to comply with internal policies and procedures
- To comply with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities
- For processing to be lawful under the General Data Protection Regulation (the “GDPR”), a lawful basis needs to be identified before processing personal data

6. Where is personal data transferred to?

We transfer your personal data to the following recipient: members of the Renta 4 Group, Custodians, Administrative Agents, Distributors and their appointed sub-distributors if any, internal and/or external Auditors, legal, tax and financial Advisers and other potential service providers, any third parties as may be required or authorized by law (including but not limited to public administrative bodies, public and judicial authorities, including any competent regulators);

Personal data can be transferred to the countries located in European Economic Area (the “EEA”), in particular: Spain.

Where we share your personal data, whether internally or externally, we will ensure that the sharing of such data is kept to the minimum necessary.

7. General visitors to the website

Like many site operators, we collect basic information that your browser sends whenever you visit our website (“Log Data”).

The collection of this information is common practice and is used to analyze and understand how the website is being used.

The following information is logged:

- IP address (the internet address of your computer);
- Date and time of your visit;
- The type of compute;
- Browser and operating system you are using;
- The URL's of websites that referred you to the website; and
- The path you take through the website.

In addition, we use third-party services provider such as Google Analytics that collect, monitor and analyze this information.

8. Personal data provided via the website

In one area of our website, you can choose to provide personal data (name, surname, email address) by completing the form which is included in the following page: <https://renta4.lu/es/politica-privacidad>

We use your Personal data to contact you.

9. Links to third party websites

Our website might contain link to third party websites.

This Privacy Notice solely concerns our website, and we do not accept any responsibility or liability for third party websites.

Please check the privacy notice for these third parties websites.

10. Cookies

A "cookie" is a small piece of text that a website places in the cookie file of your browser and that allows the site to remember who you are.

Like many other websites, we use cookies to provide you with a safe, effective and user-friendly website. We also use cookies to compile certain information to assist us to determine visitors' preferences and trends in web browsing activity.

You have the choice of deciding whether to accept cookies or not by setting your browser to block some or all cookies. However, please be aware that if you do not accept cookies, you will not be able to enjoy a comprehensive experience of our website features. Strictly technical cookies, necessary to the functioning of our website cannot be refused.

11. How do we protect personal data?

We have put in place robust system, policies and procedures to prevent and detect any incidents with unauthorized access, use or disclosure of personal data.

While the security of your personal data is of the highest importance to us, remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure.

12. For how long is personal data retained?

We only keep your information for as long as required to provide you services unless there is a legal or regulatory requirement that we keep it for longer.

13. What are your data protection rights?

Your rights in respect of your personal data are set out in Articles 15 to 22 of Regulation (EU) 2016/679. You have the right to access your personal data and to have them rectified without undue delay if it is inaccurate or incomplete.

Under certain conditions, you have the right to ask us to erase your personal data or to restrict its use.

Where applicable, you have the right to object to the processing of your personal data, at any time, on grounds relating to your particular situation, and the right to data portability. We will consider your request, take a decision and communicate it to you without undue delay and in any event within one month of receipt of the request. This period can be extended by two further months where necessary. You can exercise your rights by contacting us, using the contact information given below.

14. Changes To This Privacy Notice

We keep this Privacy Notice under regular review and publish any updates on our website at <https://renta4.lu/en>

We invite you to review periodically its latest version.

If we make any material changes to this Notice, we will notify you either through the email address you have provided us, or by placing a prominent notice at <https://renta4.lu/en>.

15. Contact Us

If you have any questions about this Privacy Notice, or the processing of your personal data, or you would like to exercise one of your data protection rights, please do not hesitate to contact us by email at: info@renta4.lu or manco@renta4.lu .

16. Complaints

If you believe that Renta 4 Luxembourg has processed your data in a manner that contravenes the general data protection regulation, you can file a complaint with the Luxembourg data protection authority:

[National Commission for Data Protection \(CNPD\)](#)

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