



# Data Protection

February 2026

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## Data Protection

AIF Management Services S.A. and its team have considered the importance of your privacy and its protection.

This present notice is made to set out how AIF Management Services S.A. and its affiliates, agents and representatives (“AMS”) will process your personal data as defined below. If you need more information, please contact our services via the following email address: [operations@aifmservices.com](mailto:operations@aifmservices.com)

### What type of information is being collected and why?

We may collect your personal information in the following contexts:

- To provide information (newsletters) about our services as well as potential events organized by our company. In that respect AMS may collect names, telephone numbers, email addresses, or other personal data. Processing is based on the counter-party's consent.
- For marketing activities. AMS may collect names, telephone numbers, email addresses, or other personal data. The process is based on our legitimate interest.
- Onboarding of client. In this respect AMS may contact the counter-party by email, SMS, telephone or any electronic means and may collect names, places and dates of birth, nationalities, genders, addresses, email addresses, telephone numbers, CVs, Identity Cards, passport numbers, information in respect of the sources of wealth, as well as other personal data in order to provide you with information on our service. Such processing is required for AMS to enter into any agreement.
- To execute any agreement. In that respect AMS may collect names, places and dates of birth, nationalities, genders, addresses, email addresses, telephone numbers, CVs, Identity Cards, passport numbers as well as other personal data.

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Such processing is based on the necessity to execute any agreement and based on a legal obligation.

- To carry out anti-money laundering (AML) monitoring and related actions necessary to meet any AMS legal obligations. Such processing is required to ensure AMS' compliance with applicable laws and regulations as well as in connection with any agreement we may enter. AMS has a legitimate interest in performing such processing to prevent any money laundering, fraud, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions.
- To report to the authorities related information in order to comply with AMS's legal obligation.
- To process an application for a job position. In such context names, places and dates of birth, nationalities, genders, addresses, email addresses, telephone numbers, CVs, level of education, employment, employers' names, remunerations as well as other personal information may be collected by AMS. In that respect the processing is based on AMS' legitimate interest.
- To update and maintain records of AMS' fee billing services. AMS may process bank account details, credit card numbers, the processing is based on the execution of an agreement and on a legal obligation.
- To comply with legal obligations as necessary for AMS' legitimate interests indicated above and/or where the processing is legally required.

### How is it collected?

We may collect your personal data via different means including among others:

- due diligence and on-boarding materials;

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- collection and filling of documentation, forms, questionnaires, agreements, registers and migration of all these if needed (reception from a former service provider);
  - communication and correspondence (email, phone call, courier, etc.);
  - collection of information from third parties subject to your authorization or from publicly known information;
  - our website may use “cookies” to help us make the site works better and to enlighten your web experience on it but these are not used to disclose and collect personal information.

#### How is it secured?

As a regulated financial entity in Luxembourg, AMS is subject to organisational and technical measures to prevent the loss, misuse, accidental or unauthorised disclosure or destruction, or access to your personal data.

AMS has/will maintain the appropriate technical and organisational security measures in order to protect your personal data against loss, destruction, theft, misuse, unauthorised access, modification or alteration.

#### How long will it be retained?

Your personal data will be processed for only the minimum period which is necessary depending on the legal/regulatory requirements for which the data was obtained and should be retained.

#### Who will it be shared with?

AMS may disclose your personal data to its auditor, service providers or to the competent authorities (CSSF, Luxembourg Tax Authorities, Luxembourg Court or other applicable bodies) that is necessary to provide the processing as described above. Such disclosure will be done in accordance with the applicable laws and regulations. Please note that the

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disclosure of personal information as set out in the above paragraph may involve the transfer of data to other jurisdictions outside the European Economic Area (EEA).

Such countries may not have the same data protection laws as your jurisdiction. In any case AMS will transfer your personal data on the basis of adequacy decisions, suitable standard contractual clauses as approved by the European Union Commission or other valid transfer mechanisms.

The EU regulation on data protection (GDPR) reminds you of all the right you have regarding your privacy and your personal information which includes the right to:

- access your personal information;
- rectify your personal information;
- restrict the use of your personal information;
- request that your personal information is erased;
- object to processing of your personal information;
- to data portability (in certain specific circumstances).

Should you wish to exercise the above rights, AMS team will answer your request regarding your personal information as soon as it is possible and within a reasonable delay after receipt of your request. Please address your query to [management@aifmservices.com](mailto:management@aifmservices.com).

We may ask for verification of your identity on such matters to comply with the regulation and assure you full protection of your data.

Please note that the exercise of the above rights is subject to certain conditions and to legal obligations such as the minimum retention period for which AMS must comply with.

For any question about this notice, complaint, demand related to your personal data, demand related your rights and their application you can reach our team via the following email address: [operations@aifmservices.com](mailto:operations@aifmservices.com) or you can write to:

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AIF Management Services S.A.

94, Rue du Grünewald

L-1912 Luxembourg

(Reminding your name, and eventually the company you are related to)

Your request shall be diligently treated subject to the rules mentioned here above.

You may complain about any presumed misconduct, breach or unauthorized disclosure that may have occurred by our treatment of your personal information within the application of privacy laws and regulations. Your complaint shall be sent to the address below. You may also have the right to lodge a complaint with the supervisory authority managing privacy matters.