

Privacy notice

The information below explains on the processing of personal data for which Söderberg & Partners Asset Management S.A. (B 184421) is data controller.

In what context do we process personal data?

We process personal data stemming from business relationships with legal persons.

Where does the personal data come from?

We collect the information both directly from you and from the company with whom you are affiliated. These companies are either investors to the funds managed by us, suppliers of financial instruments in which the managed funds are invested or service providers to us. The information is also collected as part of performing preparatory work before entering into any agreement.

To which recipients is the personal data transferred?

We may need to transfer your personal data to our service providers as part of the necessary information required for the performance of our services.

What types of personal data is processed?

We process the following data:

- name
- phone number
- e-mail address
- address, and
- the type of position you hold within the company you represent.

In addition to the above, if you are a signatory to an investor, we process the following data:

- if you are a politically exposed person (PEP)
- personal identity number, and
- copy of proof of identification.

What is the purpose and legal basis of the processing?

We have a legitimate interest in processing your personal data to fulfil contractual relations or perform preparatory work before entering into an agreement, with investors, suppliers of financial instruments or service providers. This includes evaluating the performance of financial instruments.

In addition, we are subject to legal obligations that require us to process personal data for risk and compliance management.

How is the personal data protected?

There are strong technical solutions that protect all information, including personal data, such as firewalls, intrusion protection and access control. In addition, we place high demands on delegated parties that process personal data on our account.

For how long is the personal data stored?

We keep your personal data for as long as necessary with regards to the fulfilment of the business relationship, legal requirements and the time within which claims for damages arising from the business relationship can be made. This normally accounts to no more than 11 years.

What are your rights in relation to your personal data that we process?

i. Right to access

You have the right to know if we process personal data about you. If we process your personal data, you are entitled to an extract of the personal data being processed.

ii. Right to rectification

If we were to process incorrect or incomplete personal data about you, you have the right to have such data corrected.

iii. Right to erasure and limitation

Under certain circumstances, you are entitled to have the personal data we process about you deleted. This applies, for example, if we have no legal basis for processing the data or if the data is no longer required for our operations. Instead of requesting that we delete the information, you may be able to request that we limit the processing. This means that we save the data but limit the processing to passive storage.

To whom can you direct questions and complaints?

Inquiries, complaints or requests to exercise rights in relation to our processing of your personal data may be directed at:

Söderberg & Partners S.A.

Attn: Carl-Adam Högberg

1 rue Louvigny

L-1946 Luxembourg

If you are unsatisfied with our processing of your personal data, you can lodge a complaint with the National Commission for Data Protection in the Grand-Duchy of Luxembourg, via <https://cnpd.public.lu/en.html>.