

## Data protection statement

In this data protection statement you will find more information about the processing of your personal data by UMA Wealth (Luxembourg) S.à r.l. and UMA Wealth Corporate.

### Who is responsible for the processing of your data?

The joint controllers are:

<b>UMA Wealth (Luxembourg) S.à r.l.</b> 14A rue des Bains L-1212 Luxembourg RCS : B258198	<b>UMA Wealth Corporate</b> 14A rue des Bains L-1212 Luxembourg RCS : B262873
Telephone : +352 2880 66 97 email: luxembourgdp@umawealth.com	

### Why do we process your personal data?

<b>To comply with our legal obligations:</b>  Including, prevention of money laundering (processing activities related to the prevention of money laundering and the fight against terrorism), conducting Know Your Client identification procedures, complying with lawful requests by governmental agencies and public authorities and to comply with applicable laws and regulations or as otherwise required by law			
Reason of the processing: Legal obligation.			
What personal data?	How did we get this data?	Conservation ?	With whom is this data shared?
Any information through which we identify you, including:  Identifiers Electronic identifiers Copy of identity card or other identification document Bank account numbers Function within the company All other mandatory information in accordance with the law of November 12, 2004	Data subject Public records	5 years from the end of the business relationship;  5 additional years (maximum) when required by the supervisory authority.	Third Parties in case of legal requirements: public administrations, police, judicial authorities.  Data Controllers within UMA Wealth Group's entities and Third Parties Services Providers and Processors*: Business Partners, suppliers (such as IT service providers).  Any other third party, where you have consented or requested to do so.

\*Please note that UMA Wealth (Luxembourg) S.à r.l. and UMA Wealth Corporate take commercially reasonable steps to require third parties to adequately safeguard your personal data and only process it in accordance with our instructions.

Due to the international presence of our business operations in countries that may provide a different level of protection to your personal data, UMA Wealth Group's entities and Third Parties Services Providers and Processors we use will therefore seek to ensure that all adequate safeguards are in place.

<b>Customer management</b>			
Including, follow-up and execution of contracts, billing			
Reason of the processing : execution of a contract, legal obligation, legitimate interest.			
What personal data?	How did we get this data?	How long will it take?	With whom is this data shared?
Any information through which we identify you, including:  Classic identifiers (last name, first name, address, telephone) Electronic identifiers Administrative data Sector data Customer code Function Language Currency Financial details Representative Content of the communications Business information	Data subject Official databases Commercial (public) databases	10 years from the end of the contract	Third Parties in case of legal requirements: public administrations, police, judicial authorities.  Data Controllers within UMA Wealth Group's entities and Third Parties Services Providers and Processors*: Business Partners, suppliers (such as IT service providers).  Any other third party, where you have consented or requested to do so.

\*Please note that UMA Wealth (Luxembourg) S.à r.l. and UMA Wealth Corporate take commercially reasonable steps to require third parties to adequately safeguard your personal data and only process it in accordance with our instructions.

Due to the international presence of our business operations in countries that may provide a different level of protection to your personal data, UMA Wealth Group's entities and Third Parties Services Providers and Processors we use will therefore seek to ensure that all adequate safeguards are in place.

## **What are your rights and how do you exercise them?**

If you have a complaint, question or concern about the way we use your personal data, please contact the Data Protection Officer of UMA Wealth (Luxembourg) S.à r.l. and UMA Wealth Corporate at [luxembourgdp@umawealth.com](mailto:luxembourgdp@umawealth.com) or address your request to the following addresses:

<b>UMA Wealth (Luxembourg) S.à r.l.</b> 14A rue des Bains L-1212 Luxembourg RCS : B258198	<b>UMA Wealth Corporate</b> 14A rue des Bains L-1212 Luxembourg RCS : B262873
--	--

If you contact us in order to exercise your rights, we will answer you within 1 month, starting from the day we receive your request. Exceptionally, this period may be extended (up to a maximum of 3 months), but we will then give you the reason within 1 month, starting from the day we receive your request. Whether or not you can exercise your rights depends on the processing and the legal basis.

Always make sure that you clearly state which right you wish to exercise and how you wish to receive the information (e.g. by e-mail, by post, verbally, ...). Take into account that in some cases we need additional information. We want to make sure that we are helping the right person.

### **Right of access**

You have the right to ask us about the personal data we hold about you. We can provide you with a copy free of charge, but this is not possible for all documents. We also want to respect the rights and freedoms of others.

### **Right of rectification**

You think your data is not accurate or up to date? You have the right to ask us to correct it.

### **Right to object**

In some cases, you have the right to ask us to stop processing your personal data.

### **Right to limit processing**

You can ask us to restrict the processing of your personal data, for example when we verify the accuracy of your personal data.

### **Right to be forgotten or deleted**

You have the right to ask us to delete your personal data. If we are legally obliged to retain certain personal data, we cannot comply with this request.

### **Right to withdraw your consent**

In case of processing of personal data based on your consent, this consent can be withdrawn.

### **Right to lodge a complaint with a supervisory authority**

You have the right to lodge a complaint with a supervisory authority. For your information, the Luxembourg Data Protection Commission is the following:

**CNPD**

15, Boulevard du Jazz  
L-4370 Belvaux  
Tel: (+352) 26 10 60 -1

### **Joint responsibility for treatment**

For the above processing operations, UMA Wealth (Luxembourg) S.à r.l. and UMA Wealth Corporate act as joint controllers in accordance with Article 26 of Regulation (EU) 2016/679.

In this respect, the joint data controllers jointly determine the purposes and means of the processing.

Their respective obligations with respect to the provision of the information referred to in Articles 13 and 14 of Regulation (EU) 2016/679 are carried out by means of this Personal Data Protection Statement.

### **Exercise of their rights by clients**

To exercise any of your rights, you may contact either UMA Wealth (Luxembourg) S.à r.l. or UMA Wealth Corporate.

When you exercise one of your rights in accordance with Regulation (EU) 2016/679 UMA Wealth Luxembourg will be responsible for acting on the data subject's request, assisted if necessary by UMA Wealth Corporate.