PERSONAL DATA PROTECTION POLICY

Procedure:	**Personal data protection policy**
Creation date:	**24/07/2023**
Author(s):	**RCCI**
Approver(s):	**Executive Management**
Recipients:	**All Employees** **Chair and Chief Executive Officer**

Versions and Modifications

Version	Date	Modifications Detail
V1	24/07/2023	Redaction
V2	05/12/2025	Regulatory updates and clarifications

I. Personal data protection policy

EMZ Partners and all its employees are committed to protecting privacy and personal data. EMZ Partners pays particular attention to this matter in all its operational processes.

The data protection policy describes the approach EMZ Partners takes to handling the personal data of legal representatives and contact persons of its investors, prospects and business partners.

II. Context

EMZ is subject to Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data of April 27, 2016, known as the 'GDPR'. This regulation came into force on May 25, 2018.

The data protection regime pursues three objectives:

1. strengthening the rights of individuals, in particular by creating a right to the portability of personal data and provisions specific to minors;
2. making data processors (controllers and subcontractors) more accountable;
3. enhance the credibility of regulation through greater cooperation between data protection authorities, which will be able to adopt joint decisions in cases of cross-border data processing and impose stricter penalties.

In accordance with the regulations in force, and in particular the General Data Protection Regulation No. 2016/679 of 27 April 2016, the information you provide to EMZ Partners or that EMZ Partners collects is described in this document.

You can contact EMZ Partners at the following address: clientrequests@emzpartners.com.

III. Processing purposes

Data collected in the context of investment services and collective investment scheme (CIS) management is used by EMZ Partners for all or part of the following purposes:

- monitoring CIS liabilities;
- administrative and/or accounting management of assets invested in CISs managed by EMZ Partners;
- exercising remedies and managing claims;
- the provision of investment services;
- enforcement of applicable legal, regulatory and administrative provisions.

EMZ Partners also collects your data in connection with operations relating to client management and commercial prospecting, in particular:

- operations relating to client management (monitoring of client relationships);
- informing clients and prospects about EMZ Partners' products and services;
- managing requests for access, rectification and opposition rights.

In order to comply with its legal and regulatory obligations, EMZ Partners also collects your data to combat money laundering and terrorist financing.

IV. Legal basis for the processing purposes

EMZ Partners may need to process your personal data (i) in order to fulfil a contract with you relating to its activities as a portfolio management company or as an employer, (ii) in the context of related services, (iii) in order to comply with EMZ Partners' legal and regulatory obligations and, more generally, (iv) in order to pursue EMZ Partners' legitimate interests.

EMZ Partners' legal and regulatory obligations may require the company to collect, store or disclose personal data, including but not limited to the following purposes:

- fighting money laundering and terrorist financing (AML);
- know Your Customer (KYC);
- regulatory or tax obligations: tax authorities or regulators and other public authorities (including outside the territory of the French Republic);
- more generally, compliance with the obligations of a portfolio management company.

EMZ Partners' legitimate interests cover the following cases:

- management of relations with investors and suppliers;
- commercial analysis and development of products and services;
- activities related to information security and building security, including the use of closed-circuit recording;
- assessing, bringing or defending legal claims;
- marketing and management of the management company's financial products;
- audits.

V. Categories of data collected

Depending on the purposes described above, EMZ Partners collects the following data relating to your identification:

- civil status: this includes your surname, first names and title;
- contact details: this includes your postal addresses, telephone numbers (landline and mobile) and email addresses;
- tax residence;
- data relating to your economic and financial situation: this includes your bank account details.

VI. Recipients

EMZ Partners may be required to disclose your data to the following categories of recipients, in particular:

- EMZ Partners staff members and any natural or legal person authorised by EMZ Partners to process personal data;
- where applicable, the relevant courts, arbitrators and mediators;
- the relevant ministries, supervisory and control authorities and all public bodies authorised to receive them;
- the custodian, transfer agent and auditors of our CISs;
- control departments such as statutory auditors and auditors, as well as internal control departments;
- settlement delivery systems.

These recipients may be located outside of France.

VII. Data transfers outside of the European Union

EMZ Partners and its investors and counterparties are active worldwide and may therefore, in accordance with the objectives described above, transfer data to countries within the European Union ('EU') or to third countries, *i.e.* outside the EU or the European Economic Area ('EEA').

Third country laws regarding personal data may not be as comprehensive as the laws applicable in the territory of the French Republic and the EU.

However, if EMZ Partners uses service providers in a third country, it requires them to apply the same level of protection to your data as that applicable within the EU. EMZ Partners achieves this by using standard data protection clauses approved and published by the European Commission for this purpose, available at the following address: https://commission.europa.eu/publications/publications-standard-contractual-clauses-sccs_enr.

More generally, EMZ Partners only transfers your personal data to a third country in a manner authorised by French data protection law.

VIII. Data retention periods

EMZ Partners retains data for no longer than is necessary for the purposes for which it is processed. The retention periods applied by EMZ Partners are summarised in the following points and correspond to EMZ Partners' legal and regulatory obligations:

- Commercial prospecting: 3 years from the data collection by the data controller or the last contact from the investor;
- Contracts: 5 years after the expiry or termination date;
- Regulatory data: 5 to 10 years depending on the case;
- KYC / AML-CFT (Anti-Money Laundering and Counter-Terrorist Financing) : 5 years from the termination of relations with the data subject.

IX. Security

EMZ Partners implements all technical and organisational measures to ensure the security of personal data processing and the confidentiality of personal data. Thus, in view of the nature of the data and its processing, EMZ Partners takes all necessary precautions to preserve data security, prevent data loss, distortion, damage, or unauthorised third-party access (physical protection of premises, authentication processes with personal and secure access *via* confidential usernames and passwords, connection logging, encryption of certain data, etc.).

X. Your rights

In accordance with current regulations, you are entitled to the following rights:

- access and/or sending of a copy of the personal data held by EMZ Partners about you;
- updating of obsolete, incorrect or incomplete data;
- deletion of data held by EMZ Partners about you;
- restriction of the way EMZ Partners processes and discloses your data;
- transfer of your data to a third-party service provider (portability);
- objecting to the processing;
- withdrawing your consent to the processing of your data based on the aforementioned purposes and legal bases at any time, it being specified that the exercise of this right does not affect the lawfulness of the processing based on the consent given prior to its withdrawal;
- the right to lodge a complaint with the competent supervisory authority, namely the CNIL, which can be contacted by telephone on 01 53 73 22 22 or directly online (https://www.cnil.fr/en/contact-us) and is located at the following address: 3 Place de Fontenoy, TSA 80715, 75334 PARIS CEDEX 07.

EMZ Partners will review all requests and respond within the legal timeframe.

EMZ Partners reserves the right to refuse certain requests depending on specific circumstances and in all cases in accordance with applicable laws and regulations.

EMZ Partners may ask you to provide proof of identity to confirm your identity before answering your request.

In accordance with the provisions of Article L. 561-45 of the Monetary and Financial Code, the right of access to processing carried out solely for the purposes of applying the provisions relating to the fight against money laundering and terrorist financing is exercised with the CNIL *via* an indirect access right procedure.

The processing operations carried out to identify persons subject to asset freezing measures or financial sanctions remain subject to the procedure for direct access rights with the data controller.

In any event, you may contact the CNIL at 3 Place de Fontenoy, TSA 80715, 75334 PARIS CEDEX 07, by telephone on 01 53 73 22 22 or directly online at: https://www.cnil.fr/en/contact-us.