

## **Invest4Growth Asset Management Ltd. Privacy Policy**

Invest4Growth Asset Management Ltd. (“I4G”, “us”, “we” or “the Firm”), as a Data Controller, have an obligation under the European Directive 2016/679 of 27<sup>th</sup> of April 2016, better known as GDPR to inform individual Data Subjects of their rights in relation to data held about them.

With 'data' I4G refers here to all personal data about you, information that allows you to identify yourself directly or indirectly as a natural person.

### **(i) What information is being collected**

For the purposes mentioned in the following paragraph “Why it is being collected” we collect the following categories of personal data:

Identification information: Name, address, place and date of birth, gender, nationality, marital status, photograph, national register number, tax residence and tax identification number, fixed or mobile telephone number and e-mail address, etc.

Data related to a contract proposal: information about occupation and employment, solvency, family situation, wages, educational level and knowledge and consumption habits, origin of wealth, origin of resources, etc.

Information regarding your investor profile: Your knowledge and experience with financial instruments and your financial situation, including your ability to absorb losses, your investment objectives and your risk tolerance.

Information about I4G's transactions with you: information about your exchange with I4G by telephone, e-mail, fax, etc.

Data from external sources: such as the national newspaper, government agencies, professional data providers or partners, from public sources, etc.

### **(ii) Why it is being collected**

All the data you provide to us will be processed subject to the restrictions and for the purposes pointed out in this notice, namely:

- a. To advise you through e-mail, phone call, or personal meeting, in the framework of ordinary commercial relationship, about other products or services like those related to your professional interests (legal basis for processing as per lawfulness condition is your consent as stated at art. 6 (a) of the General Data Protection Regulation 2016/679).
- b. From time to time we would like to contact you about events or conferences or seminars organised /sponsored by us or about our new services/products reaching you by email, SMS, phone call, third-party CRM marketing system (legal basis for processing as per lawfulness condition is your consent as stated at art. 6 (a) of the General Data Protection Regulation 2016/679).
- c. The obligation to contribute to the prevention of money laundering and the financing of terrorism, the identification of clients, rightholders and representatives, the determination of the profile and the control of the transactions and transactions as referred to in Article 6 (c) of the General Data Protection Regulation 2016/679);
- d. The obligation to contribute to combating fraud and tax evasion, identifying customers, accounts and contracts, and working with the competent authorities as stated in Article 6 (c) of the General Data Protection Regulation 2016/679).

- e. The obligation to respect the legislation on embargoes decided by the competent authorities domestically or abroad, against individuals, organizations or nationals of certain states, including the identification of persons and the assets concerned as mentioned on Article 6 (c) of the General Data Protection Regulation 2016/679).
- f. The obligation to protect consumers of financial products and services by identifying the profile and the category of the investor, the options and the investment objectives as stated in Article 6 (c) of the General Data Protection Regulation 2016/679).
- g. The obligation to respond to a formal request from domestic or foreign tax and judicial authorities as stated in Article 6 (c) of the General Data Protection Regulation 2016/679).
- h. The obligation to comply with the requirements for financial, fiscal, fraud or incident reporting to domestic or foreign supervisors and tax authorities as stated on Article 6 (c) of the General Data Protection Regulation 2016/679);

**(iii) Who is collecting data**

Data will be collected by Invest4Growth Asset Management Ltd. (the “Data Controller”), with business address Dragonara Business Centre, 5th Floor, Dragonara Road, STJ 3141, St. Julian's, Malta.

The Data Protection Officer is Marketa Rusenkova who can be contacted by the following methods:

Email: [GDPR@i4gam.com](mailto:GDPR@i4gam.com)

Telephone: + 356 2034 1766 or +356 9970 1555

Post: Dragonara Business Centre, 5th Floor, Dragonara Road, STJ 3141, St. Julian's, Malta

**(iv) How data is processed**

Personal data is processed both manually and electronically in accordance with the abovementioned purposes and, in any case, in order to guarantee data security and data confidentiality in compliance with current regulations. Our Employees and Third-Party processors The Rocket Science Group LCC, Pipedrive Inc. and Microsoft Corporation can access your data. Our Employees and Third-Party processors are appropriately designated and trained to process data only according to the instructions we provide them. All the data will be processed until the withdrawal of consent or at the end of a defined retention period.

**(v) How data is stored and with whom it could be shared**

Data is recorded on paper, databases and IT systems. Basic personal data such as contact details, company name and address will be stored on our CRM system which is accessible to our sales, marketing, compliance, IT and senior management for the above-mentioned purposes.

We may disclose your Personal Data with authorized service providers who perform services for us (including cloud services, data storage, support and marketing assistance). Our contracts with our service providers include commitments that they agree to limit their use of Personal Data to our specific instructions and to comply with privacy and security standards.

Without prejudice to any communications made to comply with legal or contractual obligations, data may also be disclosed to external parties as required by laws or regulations (e.g. court, tribunal, Regulatory Authority or Governmental Entity).

When we share your information with contracted Third-Party companies we take all reasonable steps to ensure that your information and privacy are protected in line with the applicable legal obligations.

A distinction is made between the retention period and an archiving period:

Retention period: Data is stored for a period of 7 years from the date of the last successful contact or the end of the commercial relationship, unless permission is withdrawn or a request for erasure is made.

Archiving period: complies with the legal and tax obligations of I4G, as well as the legal need to keep your records up to the storage period for evidence or to respond to requests for information from the competent authorities, in particular:

- In principle, bank account data are kept for 10 years after closing
- Other data is stored for 7 years

**(vi) Your rights and how to exercise them**

You (natural persons to which the data refers) have the right to determine how we use your data and to oppose to the purposes of processing at any time. You have the right to withdraw your consent at any time, without affecting the lawful processing of data based on consent up to the point of its withdrawal.

We remind you that you have the right to request from us access to and rectification or erasure of personal data, or a restriction of processing, or to object to processing of data concerning you.

You also have the right to receive your personal data that you provided to us in a structured, commonly used and machine-readable format and have the right to transmit such data to another controller without hindrance from us. In exercising your right to data portability, you have the right to have your personal data transmitted directly from a controller to another, where technically feasible.

You can send an email to [GDPR@i4gam.com](mailto:GDPR@i4gam.com) to exercise your rights including filing a complaint about how we process your Personal Data.

If you consider that the processing of your personal data infringes applicable data protection laws, as a data subject you have the right, without prejudice to any other administrative or judicial remedy, to lodge a complaint with a supervisory authority, in particular, in the Member State of your habitual residence, place of work or place of the alleged infringement.

The Supervisory Authority for the Malta where we are located and your data is processed in is the Office of the Information and Data Protection Commissioner (IDPC) who can be contacted via phone +356 2328 7100 or through the Contact section of their website, <https://idpc.org.mt/en/Pages/contact/contact-information.aspx>.