

Personal Data Protection Charter

“Privacy Charter”

[25 May 2018]

Contents

03	1. Introduction
04	2. Who is responsible for processing your Data?
05	3. At what moment is your personal Data collected?
06	4. What are the purposes for which DPAS processes your Data? <ul style="list-style-type: none">4.1 COMPLIANCE WITH LEGAL AND REGULATORY PROVISIONS4.2 PRECONTRACTUAL MEASURES BEFORE YOU BECOME A CLIENT OF DEGROOF PETERCAM4.3 CONTRACTS BETWEEN YOU AND DPAS4.4 LEGITIMATE INTERESTS OF DPAS4.5 LEGITIMATE INTEREST OF DPAS IN ADOPTING DIRECT MARKETING PRACTICES4.6 YOUR CONSENT TO SENDING ELECTRONIC COMMUNICATIONS
11	5. What types of Data is processed by Degroof Petercam?
13	6. Who will DPAS share your data with? <ul style="list-style-type: none">6.1 WITHIN THE DEGROOF PETERCAM GROUP6.2 OUTSIDE THE DEGROOF PETERCAM GROUP6.3 TRANSFER OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)
15	7. How long is your Data conserved for?
16	8. Security of your Data
17	9. What are your rights? <ul style="list-style-type: none">9.1 RIGHT TO ACCESS AND RECEIVE YOUR DATA9.2 RIGHT TO HAVE YOUR DATA CORRECTED9.3 RIGHT TO HAVE YOUR DATA DELETED9.4 RIGHT TO OPPOSE THE PROCESSING OF YOUR DATA9.5 RIGHT TO WITHDRAW YOUR CONSENT9.6 RIGHT TO THE PORTABILITY OF YOUR DATA9.7 RIGHT TO RESTRICT THE PROCESSING OF YOUR DATA9.8 RIGHT TO OPPOSE COMMUNICATIONS FOR ADVERTISING PURPOSES (DIRECT MARKETING)
19	10. How can you send us a request relating to the Privacy Charter? <ul style="list-style-type: none">10.1 GENERAL REQUEST10.2 REQUEST CONCERNING DIRECT MARKETING ACTIVITIES10.3 RIGHT TO FILE A COMPLAINT

1. Introduction

The purpose of this Charter (the “Privacy Charter”) is to provide you with a full explanation of how Petercam Asset Services S.A. (“DPAS”) processes the personal data of its clients, its potential future clients or individuals linked otherwise to DPAS such as representatives, shareholders, beneficiaries or beneficial owners, contact persons, DPAS website users or even the representatives of a legal person (the “Data”).

We at DPAS place capital importance on data protection and through this Charter we hope to offer you a transparent vision of our policies and practices on data protection. Please read the information in this Privacy Charter carefully to fully understand the purposes for which DPAS uses your Data.

Furthermore, and in accordance with the regulations in force, this Privacy Charter applies only to Data which might directly or indirectly identify an individual person. It completes the agreements concluded between you and DPAS.

In this document, you will notably find more detailed information about your rights relating to the protection of your personal data and the way in which you can exercise these rights.

Your data is processed in accordance with the applicable legal provisions and notably Regulation (EU) no. 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and the free movement of such data (“GDPR”) and the related Luxembourg laws.

If you would like further information about data protection, this is available from the Luxembourg National Commission for Data Protection (abbreviated to CNPD) (<https://cnpd.public.lu>)

DPAS reserves the right to amend this Privacy Charter in order to account for more recent practices. The most recent version of the Charter will always be available on the DPAS website www.dpas.lu.

2. Who is responsible for processing your Data?

The entity responsible for processing your data is the company Degroof Petercam Asset Services S.A. (DPAS) whose registered office is situated in the Grand Duchy of Luxembourg at Eugène Ruppert 12 at L-2433 Luxembourg, and whose Luxembourg Companies' Register (RCS) registration number is B104980.

DPAS is a management company belonging to the Degroof Petercam Group. Degroof Petercam is held by family shareholders with a long-term commitment, and offers its services to private and institutional investors.

Its clients enjoy a unique combination of services including private banking, institutional management, investment banking (corporate finance and financial intermediation) and asset services.

The Degroof Petercam Group is active in Belgium, Luxembourg, France, Spain, Switzerland, Holland, Germany, Italy and Canada.

Further information about the activities of the Degroof Petercam Group is available at <https://www.degroofpetercam.com..>

DPAS is accountable to the supervisory authorities for compliance with data regulations. DPAS determines the purposes for which the Data is processed, as well as the procedures implemented and all processing-related characteristics, as explained in this Charter.

3. At what moment is your personal Data collected?

Although not exhaustive, examples of when some of your Data might be collected by DPAS include the following:

- if you become a client of DPAS (this notion of client includes the counterparties to contracts concluded with DPAS) and throughout your relationship with us;
- if you indicate your interest in our products and services by contacting us via the available channels or when you use them;
- if you transmit to us a duly completed form;
- if you use our on-line services;
- if you respond to our invitations to events organised by DPAS;
- if you visit our offices and are filmed by our surveillance cameras;
- if you publish your Data on social networks or websites with unrestricted access;
- if databases are purchased or leased from professional data providers;
- if your Data is published or transmitted by authorised third parties (Official Journal of the Grand Duchy of Luxembourg, agents or brokers, companies belonging to our Group) or in the press.

4. What are the purposes for which DPAS processes your Data?

DPAS collects and processes your personal Data for the purposes described below.

DPAS alone determines these purposes, based on the needs of its business activities, and ensures that only the data which is necessary and relevant to a specific purpose is processed.

Generally speaking, DPAS processes your Data in the situations permitted by the law, in other words:

- 4.1 within the context of complying with regulatory and legal provisions to which DPAS is subject;
- 4.2 within the context of precontractual measures before you become a client of DPAS;
- 4.3 in order to proceed to the execution of the contract concluded by you and DPAS;
- 4.4 for reasons relating to the legitimate interests of DPAS;
- 4.5 for reasons relating to the specific legitimate interest of DPAS to adopt direct marketing practices ;
- 4.6 on the occasion of a specific request and based on clear and unequivocal information, if we obtain your consent to the sending of electronic communications.

4.1 COMPLIANCE WITH LEGAL AND REGULATORY PROVISIONS

In the exercise of its management company activity, DPAS is obliged to respect certain legal and regulatory obligations which require your Data to be processed in a particular way. Processing of this nature might require the communication of your Data to the competent supervisory, judicial or administrative authorities, whether national, international, European or worldwide, and to different entities of the Degroof Petercam Group or third parties. Of course, we seek to ensure that your Data is only transmitted in circumstances where DPAS is bound by these obligations. You can obtain further information about the legal and regulatory obligations to which DPAS is bound using the contact methods detailed in chapter 10 of this Privacy Charter.

Below is a non-exhaustive list of the legal and regulatory areas in which DPAS is required to process your Data.

This list is subject to change:

Respecting:

- the rules in force on the embargos decided by the competent Luxembourg or international authorities, whether these decisions concern individuals, organisations or nationals of certain States. This might take place, for example, by the identification of the persons and assets concerned;
- the rules on financial, tax, fraud or incident reporting to the prudential supervisory authorities;
- the rules, injunctions and requests of the competent authorities relating to financial, operational, legal risk management, etc.

Contributing to:

- combating and preventing the financing of terrorism and money laundering by the determination of the risk profile, the identification of the clients, their representatives and beneficiaries and the control of their operations and transactions;
- combating market abuse by detecting and reporting the abuse of privileged information, market manipulation and suspect transactions. DPAS is also obliged to advise, identify and/or report the abuse of privileged information and market manipulation and to report suspect transactions to the supervisory authorities;
- combating fraud and tax evasion in collaboration with the competent authorities, by the identification of the clients, their accounts and their contracts.

Communicating:

- to the various supervisory, tax and legal authorities on the basis of official requests;
- to the various competent authorities monitoring privacy protection on the basis of official requests or where imposed by the regulations;
- to the various providers of financial products and services or payment services, information about the accounts, transactions and their respective beneficiaries or issuers;
- to the auditors of the company on the basis of official requests or where imposed by the regulations.

Proceeding:

- to the identification, with a view to protecting the investor, of appropriate or adequate financial products and services based on its risk profile and its investor category;
- to the recording of certain telephone conversations and certain electronic communications.

4.2 PRECONTRACTUAL MEASURES BEFORE YOU BECOME A CLIENT OF DPAS

Before a contract is concluded, regardless of the means of communication used and made available to you by DPAS, DPAS must analyse your request to see whether the envisaged contract can actually be concluded.

As part of this analysis, DPAS will process your Data in order to progress your request and particularly to determine the conditions under which the contract could be concluded.

This situation might arise, for example, within the context of a request to enter a collective management agreement.

DPAS reserves the right not to conclude a contract if it is not provided with the information it has requested.

4.3 CONTRACTS BETWEEN DPAS AND ITS CLIENTS

In the execution of the contracts binding DPAS and its client and also for terminated contracts, regardless of the communication channels used, DPAS can, and must in certain cases, obtain and process the Data concerning its client for the following reasons:

- observance of the administrative and accounting obligations of DPAS;
- assurance of providing the client with a quality service;
- assurance that the client's assets are protected against any fraudulent activity;
- execution of the management contract or other contracts concluded between DPAS and its client;
- sale of financial products and investments and management of the client's portfolio;
- consolidation and monitoring of the reporting of accounting and financial data.

If the Data required to process your request or conclude a contract is missing, we will inform you of this as soon as possible. If the missing Data is not provided, we reserve the right not to progress your request.

To carry out these different tasks and provide an optimal service, DPAS must transmit or share the Data among its various internal departments.

DPAS might be required to process Data for additional purposes for the execution of contracts and, more generally, for the purposes of its relationship with its client.

4.4 LEGITIMATE INTERESTS OF DPAS

While seeking to preserve a fair balance and duly account for your rights and freedoms, notably your right to protect your privacy, DPAS processes your personal Data in the pursuit of its legitimate interests.

In this situation, DPAS will always seek to limit to the maximum extent possible the impact of the processing envisaged in order to preserve this balance.

Despite this, if you have objections to this processing, you may exercise your right of opposition based on the conditions and limits described in section 9.4.

Personal Data is therefore processed with a view to:

- personalising our services;
- analysing and managing risks and actuarial or statistical calculations;
- managing claims or disputes;
- archiving and evidential requirements;
- carrying out the preventive and operational management of physical and information security;
- preventing and combating fraud, abuse or other offences;

- coordinating clients and client groups to improve synergies and general efficiency within DPAS;
- using cookies which are necessary for browsing our websites and other platforms accessible to you. To find out more about cookies, their use and the modification of your parameters, please read our cookies policy available at the website: www.degroofpetercam.lu/fr/politique-de-cookies.
- improving operations within DPAS, its quality of service and its processes, notably:
 - by ensuring the ongoing training of our representatives, which involves the recording of certain telephone conversations;
 - by centralising the management of clients particularly in order to establish more detailed profiles;
 - by developing segmentation operations based on individual or group profiles, particularly in order to improve our relationship management. This situation might arise, for example, where we make a distinction between “individual” and “corporate” profiles.

4.5 LEGITIMATE INTEREST OF DPAS IN ADOPTING DIRECT MARKETING PRACTICES

DPAS also processes your Data for segmentation purposes, so as to be able to offer you suitable and personalised products or services corresponding to your professional or private situation and accounting for the history of your relationship with the company.

Processing like this might arise where DPAS:

- evaluates your socio-economic, demographic or family status, notably by identifying key moments at which specific products or services could be offered to you;
- studies the efficacy of its advertising and marketing campaigns;
- evaluates your key interests and purchasing behaviour as a client;
- improves the forms and communication channels available to you by automatically certain entering data obtained previously and then asking you to confirm the data;
- prepares personalised product and service offers;
- sends personalised advertising by post or by telephone.

As part of developing personalised products and services, DPAS might also provision is database using specialist external companies.

4.6 YOUR CONSENT TO SENDING ELECTRONIC COMMUNICATIONS

After asking you for your specific consent, DPAS may process your personal Data, particularly your mobile telephone number and your e-mail address, in order to send you invitations to events, advertising or personalised offers as part of direct marketing campaigns or via newsletters.

If you no longer wish to receive electronic communications, DPAS always provides you with the possibility of opposing this processing of your Data at no charge. For further details, we refer you to chapter 9 of this Charter which describes your rights concerning the processing of your Data, and chapter 10, which sets out the procedures for exercising these rights.

5. What types of Data is processed by DPAS?

DPAS can process different types of Data, notably data belonging to the different categories described in the table below.

STANDARD CATEGORIES	OF DATA
Your identification Data	First and last names, title of nobility, gender, date and place of birth, postal addresses, nationality(ies), client identification numbers, national registration numbers, tax residences and the Data contained in your (electronic) identity card.
Your contact Data	Language, landline or mobile telephone number, e-mail address and more technical Data such as your computer's IP address and, more generally, the data identifying the devices you use to connect to our services.
Your personal and socio-demographic status	Marital status, family situation or professional status and changes or key moments concerning these, and your other relationships. Information about your training, academic title and level of education.
Your habits, preferences or key interests	Your habits and preferences during your meetings and contacts with our staff and representatives at certain events or on-line (via our websites). Your key interests such as your leisure activities, lifestyle, private or professional projects, etc.
Your overall financial situation	Your professional and personal situation, your solvency, salary, name of employer, source of your assets or funds, your tax compliance, etc.
Banking, financial and transaction data	Account numbers, investment products, etc.

Your satisfaction with our services	The various comments or suggestions you might have made via the different communication channels available to you or via social networks.
Audio-visual Data	We record the telephone conversations between you and DPAS representatives. We use video surveillance cameras and systems in strict compliance with the legal stipulations.
Certain data comes from public sources or is obtained via third parties	Data subject to an obligation of publication (Official Journal of the Grand Duchy of Luxembourg, CSSF (financial supervisory authority), Luxembourg Companies' Register (RCS), etc.) or transmitted by a public institution such as the tax administration, courts or public prosecutor. The Data you have decided to make publicly accessible on open networks (websites, blogs, social networks) or originating from press publications. The Data transmitted by professional data providers. If you would like more information about Data originating from public sources or obtained from third parties, you can contact us via the various communication channels available to you and described in chapter 10 of this Charter.
Data gathered via cookies	We use cookies, which are small text files created by a program on the DPAS server and stored on the hard disk of the user's device. Cookies can fulfil different roles: storing your preferences, collecting statistical data, adapting the content and/or advertising of sites based on your requirements, etc. To find out more about cookies, their use on our websites and the modification of your parameters, please read our Cookies policy at the following website: www.degroofpetercam.lu/fr/politique-de-cookies

In accordance with law, DPAS does not, in principal, process data of certain categories, namely those concerning your racial or ethnic origin, your political opinions, your religion or philosophical beliefs, your union memberships, your health or your sexual preferences. Neither will we process data relating to criminal sentences and offences except when compelled to do so by law, notably under the regulations on combating money laundering and the financing of terrorism. None

Genetic or biometric data is not processed or used by DPAS within the scope of its product or service offers. If we were required to process Data of this nature, we would only do so in accordance with the conditions and requirements set down in law and informing you specifically beforehand of the purposes of the processing.

6. Who will DPAS share your Data with?

Within the context of the purposes mentioned above, DPAS might communicate your personal Data to the recipients listed below.

6.1 WITHIN THE DEGROOF PETERCAM GROUP

DPAS might communicate Data to employees of DPAS, companies affiliated with Degroof Petercam located in Luxembourg or abroad, and to their employees.

DPAS and its affiliated companies might exchange and centralise Data to ensure the optimal management of their services, product offers or to maximise their synergies at a Group level, notably as part of a common risk assessment and client approval policy, to gain a global vision of its clients or as part of combating fraud and money laundering.

For more information about the Degroof Petercam Group and its affiliated companies, see our website: <https://www.degroofpetercam.com>.

6.2 OUTSIDE THE DEGROOF PETERCAM GROUP

A. Supervisory authorities and public authorities

Besides sharing Data with the company's auditors, DPAS is obliged, by virtue of the regulations in force, to communicate certain Data (information or documents concerning its clients, their beneficiaries and/or beneficial owners, their accounts and their transactions) to supervisory authorities and public authorities such as:

- public authorities, national and international regulators, supervisory authorities, tax authorities and other similar foreign, European or international authorities;
- more generally, any judicial or administrative authority;
- DPAS might notably be obliged under foreign law (notably US law) to communicate all details about transactions falling within the remit of US local authorities (control or supervisory authorities such as the Commodity Futures Trading Commission or the Securities & Exchange Commission), particularly the name of the clients concerned and/or their tax identification numbers (for the United States). We always seek to limit the transmission of your Data and to circumstances only where DPAS is obligated to do so.

B. Sub-contracting and specialist third parties

DPAS might decide to communicate your Data to third party entities if it decides to sub-contract certain services to specialist third parties or if based on a legitimate interest.

The communication of your Data in this situation is always within the limits strictly necessary to enable the services concerned to be provided by these sub-contractors. We also place great attention on the choice of these specialist third parties. As such, DPAS always seeks to obtain commitments to security and confidentiality from sub-contractors if they will be processing your Data, particularly commitments to limit access to your Data and to protect your Data by the appropriate technical and organisational measures. DPAS also verifies that processing is in accordance with the instructions given by it to its sub-contractor.

Based on the above, DPAS notably currently shares your data in the following circumstances:

- organisation of advertising and direct marketing campaigns;
- management of disputes with the involvement of legal firms or enforcement officers;
- creation and maintenance of DPAS' computer applications and tools;
- marketing of its activities;
- organisation of events;
- management of client communications;
- regulatory reporting;
- settlement of financial transactions. For information purposes, DPAS can provide you with a non-exhaustive list of its partners:
 - Swift: for message exchanges within the framework of secure financial transactions;
 - custodians and sub-custodians of financial products and instruments;
 - Clearstream Banking SA: within the framework of payment and securities transaction clearing and settlement activities.
 - Banque Degroof Petercam Luxembourg SA, its shareholder and principal sub-contractor.

C. DPAS as a sub-contractor

This Charter only concerns the data controller activities of DPAS.

Although this Charter only concerns the data controller activities of DPAS, we would also draw your attention to the fact that DPAS is also a sub-contractor of third parties within the context of certain relations with commercial partners. Hence, and as part of these contractual relations, DPAS might also be required to communicate some of your Data, notably in the performance of the following roles:

- intermediary in investment services;

6.3 TRANSFER OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

Due to our activities, DPAS might be required to communicate Data outside the EEA.

In this situation, DPAS will only communicate Data to countries which do not guarantee adequate protection strictly in the cases set out in the General Data Protection Regulation (GDPR). DPAS will therefore adopt all appropriate measures to guarantee that your Data is duly protected in the destination country, notably by ensuring the protection of personal Data is guaranteed by appropriate contractual provisions or by any other means offering an adequate level of security.

7. How long is your Data conserved for?

DPAS conserves your Data for the time necessary to accomplish the purposes for which your Data was collected, but also to fulfil its legal and tax obligations, for evidentiary purposes, to carry out internal audits or to respond to information requests from the competent authorities.

In this situation, we undertake not to conserve your Data beyond the time period necessary to accomplish the purposes for which it was collected. Here, DPAS makes a distinction between a retention period and an archiving period:

- the retention period is the maximum data processing period for a specific purpose. The duration of the retention period varies depending on the case. Below are several examples:
 - video surveillance images are generally conserved for one month unless they might assist with identifying an offence, a nuisance, serve as evidence of damage or serve to identify the perpetrators of an offence etc;
 - Data relating to a prospect is conserved for five years except if there is contact with the prospect in the interim, in which case a new period of five years will begin again from the date of the last contact;
 - your client Data will generally be conserved for the duration of your relationship with DPAS.
- The archiving period corresponds to the Data conservation period which enables DPAS to fulfil its legal and tax obligations, conserve Data for evidentiary purposes, carry out internal audits or respond to information requests from the competent authorities. The duration of the archiving period varies depending on the case. Below are several examples:

- Data relating to a shareholder investing in a UCI is generally conserved for ten years following the cessation of the relationship;
- Data relating to records of telephone conversations in which the client issues DPAS with instructions within the context of executing a contract is conserved for seven years from January 1 of the year following the end of the contract in question.

At the end of these time periods, your Data will be deleted or anonymised. Anonymisation is an irreversible process whereby personal data is modified so that it no longer identifies a person after processing.

8. Security of your Data

DPAS adopts the necessary measures, particularly organisational and technical, to ensure the confidentiality, integrity and availability and resilience of the Data, systems and processing services under its control and their processing security in accordance with legal requirements.

Our staff will only access your Data if relevant to accomplishing their missions.

Our employees are bound by strict professional discretion and are obligated to respect the confidentiality of your Data. Our premises and access to our servers and networks are strictly protected and we place particular care on the choice of our providers and commercial partners, to ensure that any Data transfer or processing by those parties is completely secure.

Technical protection measures are also implemented by DPAS to offer an ever-increasing level of security for your Data.

These measures might notably consist of the encryption of your Data and the installation of firewalls or antivirus systems.

You can help us secure our Data by notably observing the following advice:

- always run the updates of your web browser or your mobile applications;
- never disable your devices' integral security features;
- ensure that a firewall is enabled on your devices to permanently control incoming and outgoing information flows;
- install a trusted antivirus program and ensure you update it;
- secure your wireless connection (WiFi);
- don't choose passcodes with overly simple combinations (de such as 111111, 12345), overly typical formulations ('password' type) or relating to personal information (date of birth, etc.);
- never communicate your confidential passcodes to third parties (including family members and friends) and never let third parties use them;
- report any risk of fraud or misuse to DPAS.

9. What are your rights?

Your rights concerning the processing of your Data are as follows.

9.1 RIGHT TO ACCESS AND RECEIVE YOUR DATA

You can obtain your personal Data and ask us the following information: whether we are processing your Data or not; the purposes for which your Data is processed; the different Data categories processed; the recipients to which it is communicated and the way in which we obtained your Data. This right can be exercised notwithstanding Data already available via other channels and subject to respecting the rights of third parties.

If your Data is processed by an automated system, this right also enables you to ask DPAS to provide you with the Data it holds about you in a structured format which is machine accessible and readable.

9.2 RIGHT TO HAVE YOUR DATA CORRECTED

You can always ask us to correct your Data if you find it is incomplete or incorrect.

With a view to keeping your Data completely up-to-date and provide you with a quality service, we would ask you to inform us of any change (such as a house move, renewal of your identity card, etc.).

9.3 RIGHT TO HAVE YOUR DATA DELETED

You can ask DPAS to delete your Data or render it unusable based on the reasonable technical resources available to it.

However, DPAS can refuse to carry out the deletion if it must continue to process your Data for imperative reasons, notably if the Data is necessary for DPAS to fulfil its legal obligations, for evidentiary purposes to retain a history of transactions or to fulfil its contractual obligations.

9.4 RIGHT TO OPPOSE THE PROCESSING OF YOUR DATA

You can oppose the processing of your Data by DPAS. If this processing is based on the legitimate interest of DPAS, DPAS might, however, refuse this request for an imperative reason, notably in circumstances in which the processing of the Data is necessary in order to prevent fraud or money laundering, for example. We

would also draw your attention to the fact that your opposition to the processing of your Data for reasons other than direct marketing might result in DPAS terminating its contractual relationship with you or refusing to execute a transaction.

9.5 RIGHT TO WITHDRAW YOUR CONSENT

You can withdraw the consent given to DPAS to process your Data at any time. However, if you and DPAS are still under contract, DPAS might, after weighing up its own and your interests, continue to process some of your Data.

You can make your request via the various communication channels made available to you by DPAS. You can also change your mind via these same channels.

9.6 RIGHT TO THE PORTABILITY OF YOUR DATA

Where we process your Data on the basis of your consent or the existence of a contract, you can ask us to transmit your Data directly to another data controller if this is technically feasible for DPAS.

9.7 RIGHT TO RESTRICT THE PROCESSING OF YOUR DATA

You can ask for the processing of your Data to be restricted in certain specific cases.

9.8 RIGHT TO OPPOSE COMMUNICATIONS FOR ADVERTISING PURPOSES (DIRECT MARKETING)

You can oppose the processing of your Data for direct marketing purposes on request and at no charge.

If you exercise this right, DPAS will stop sending your advertising communications to your e-mail address, your postal address or your telephone, based on your request. Your request will be processed as soon as possible.

10. How can you send us a request relating to the Privacy Charter?

10.1 GENERAL REQUEST

Any request relating to the exercise of your rights may be made and addressed in writing to DPAS at any time and at no charge.

Simply send us a dated and signed request written clearly and precisely. We would ask you to attach a copy of your identity card so that we are sure that no one is exercising your rights in your name. We reserve the right to make direct contact with you to verify the authenticity of the request.

You can send your request via the different channels made available to you by DPAS:

- by post, with a copy of your identity document, to our data protection officer (“DPO” or “Data Privacy Officer”) at the following address:
Degroof Petercam Asset Services S.A.
c/o Data Privacy Officer
Rue Eugène Ruppert 12,
L-2453 Luxembourg
- by sending an e-mail with a copy of your identity card to the address
dataprivacy_dpas@degroofpetercam.lu

10.2 REQUEST CONCERNING DIRECT MARKETING ACTIVITIES

You can send your request via the different channels made available to you by DPAS:

- by clicking on the “Unsubscribe” link in one of the e-mails or electronic newsletters sent by DPAS ;
- by post, with a copy of your identity document, to our data protection officer (“DPO” or “Data Privacy Officer”) at the following address:
Degroof Petercam Asset Services S.A.
c/o Data Privacy Officer
Rue Eugène Ruppert 12
L-2453 Luxembourg
- by sending an e-mail with a copy of your identity card to the address:
dataprivacy_dpas@degroofpetercam.lu

10.3 RIGHT TO FILE A COMPLAINT In the

event of a dispute concerning the processing

of your

Data, you can contact DPAS:

- by post, at the address: Degroof Petercam Asset Services S.A.
c/o Compliance Department
Rue Eugène Ruppert 12
L-2453 Luxembourg
You can find further information on the website
<https://www.dpas.lu>.

You are entitled to file a complaint with the Luxembourg National Data Protection Commission:

- by post, at the following address:
Commission Nationale pour la Protection des Données
Avenue du Rock'n'Roll 1
L-4261 Esch-Sur-Alzette
- via the website:
<https://cnpd.public.lu/fr/droits/faire-valoir/formulaire-plainte.html>
- by telephoning +352 26 10 60-1.



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