



MONEY IS ONLY A TOOL. IT WILL TAKE YOU WHEREVER YOU WISH, BUT IT WILL NOT REPLACE YOU AS THE DRIVER

**Privacy Policy**  
**Moventum S.C.A**  
**May 2023**



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## Data protection

Your privacy is important to us and we are committed to safeguard your personal information at all times. Below you may find useful information regarding the processing of your personal data by Moventum S.C.A. (subsequently referred to as Moventum) as well as of your rights.

### 1. Who is the data controller and who to contact?

Moventum is the data controller, and you may contact us via the means of communication agreed with us.

Moventum S.C.A.

12, rue Eugene | L-2453 Luxembourg

### 2. What data sources and data do we use?

We process the data that we receive through our account relationship with you. We receive the data either directly from you, e.g., in the context of opening a Moventum account or placing an order, or indirectly from public registries or other third-party sources in accordance with the applicable laws and regulations. In particular, the data we process about you include but are not limited to personal data such as your name, identification number, date of birth, KYC documents, physical and E-mail address, phone number, financial information, including payment and transaction records and information relating to your assets, liabilities, earnings and investments (including your investment objectives), credentials, signatures or other identifiers (e.g. authentication information), professional information about you (such as your profession, job title, employer and work experience), your knowledge of and experience in the investment field, data received in the context of the products and services you use, tax-related data, communications (e.g. exchange of letters with you), advertisement and sales data (e.g. potential interesting products for you).

### 3. For which purposes do we process your data and on which legal basis?

#### 3.1. For the performance of contractual obligations

We process your data for the performance of our contracts with you, e.g., custody services and execution of your orders and other investment services as the case may be. The specific data processing purposes are determined in accordance with the particular product and the underlying contract.

#### 3.2. For purposes that are in our legitimate interests

We may also process your data on the basis of a balance of interests to pursue our or a third party's legitimate interest. This is carried out for the following purposes:

- For client advisory services and sales.
- For general management and development of our services, systems and products.
- For the fulfilment of the internal requirements of Moventum and/or the Moventum affiliated companies, including risk management, audit and management purposes to assure the sound and responsible management of Moventum and of the affiliated companies.
- To assure the safety and continuity of our services (incl. IT services).
- For advertisement and market research.
- For the establishment, exercise and defense of legal claims.
- For the prevention and investigation of crime, as well as risk management and fraud prevention.

Our interest for the respective processing of data is based on the respective purposes and is otherwise of economic nature. As far as possible in respect of the particular purpose, we rely on pseudonymization and anonymization to process your data.



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### 3.3. With your consent

In limited circumstances, your data may be processed with your consent which we obtain from time to time such as when you consent to marketing or processed with your explicit consent in the case of special categories of personal data. You have the right to withdraw your consent at any time subject to the applicable laws and regulations.

### 3.4. For the compliance with a legal obligation

We are subject to various legal (e.g., laws of the financial sector, anti-money laundering laws, tax laws) and regulatory obligations. The processing activities performed in order to ensure that Moventum fulfils its legal and regulatory obligations include, among others, the verification of your age and credentials, fraud- and money laundering prevention, accounting, risk rating and management (including creating a risk profile for you, verifying your experience and knowledge in the investment field), investments, determination of investment preferences, compliance with the requests and requirements of national and foreign regulatory and law enforcement authorities, as well as compliance with tax-related monitoring and notification obligations.

### 4. Who processes your data?

Within Moventum, your data will be processed only by certain departments to fulfil our contractual or legal obligations or to fulfil their respective tasks (e.g., operations, compliance, sales and marketing). Beyond that, the following entities may receive your data:

- Processors (i.e., service providers) appointed by us, particularly in the sector of IT services and printing services, which process your data on our instructions.
- Public authorities and institutions (e.g., CSSF) in the case of a legal or regulatory obligation.
- The respective shareholders, agents, employees, consultants, authorized representatives, financial intermediaries, auditors, service providers, as well as any affiliates or subsidiaries of Moventum (and their respective agents, employees, consultants, authorized representatives).
- Entities that act on behalf of you, or which have a business relation with you such as, payment recipients, beneficiaries, authorized representatives, intermediaries, clearing houses, clearing and settlement systems, companies/funds in which you hold securities/financial instruments (if those securities are held by you with Moventum), etc.
- Specialized companies, such as the Society for Worldwide Interbank Financial Telecommunication (SWIFT) and clearing companies which process personal data relating to money transactions and which can use for those purposes processing centers that are located within the European Union or abroad (particularly the United States).
- External fund managers which provide asset management services for you.

### 5. How long will we keep your data?

As far as necessary, we will keep your data for the duration of our relationship, which includes the preparation and signing of a contract. In addition, we might process your data after the termination of our relationship for operational purposes in accordance with the applicable laws as well as pursuant to various retention and documentation obligations, which inter alia ensue from MiFID II and from anti-money laundering laws. The retention periods provided by those laws vary from five to ten years. Finally, the retention period will also be determined by the legal limitation periods that can be, for example as set forth by the civil code (Code Civil) or the code of commerce, three years or even in some cases thirty years.

### 6. Are there any transfers of data to a third country or to an international organization?

We transfer your data to countries outside of the European Economic Area (EEA) only insofar as necessary for the execution of your orders (e.g. security orders), for complying with a legal obligation, insofar as you have given us your consent to do so or where our service providers are located abroad (in the latter case, appropriate contractual safeguards are implemented to ensure the protection of your data).

### 7. What other data protection rights do you have?

Under certain legal conditions, you have the right of access and to object to processing of your data. You also have the right to lodge a complaint with a data protection authority.

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## 8. To what extent do we use automated individual decision-making?

In certain circumstances Moventum may process your personal data through automated decision-making. Were we to rely on such processing in a particular situation, we should inform you separately, insofar as we are legally required to do so. In certain circumstances, you can request not to be subject to automated decision-making, including profiling.

## 9. When do you have the right to object to the processing?

### 9.1. Right to object relating to your particular situation.

You have the right to object at any time, for compelling and legitimate reasons relating to your particular situation, to the processing of your personal data except in cases where legal provisions expressly provide for that processing.

### 9.2. Right to object where your data are processed for direct marketing purposes.

We may, within the legal limits, process your data for direct marketing purposes. You have the right to object at any time to processing of your personal data for such marketing. If you object to such processing, your personal data will no longer be processed for such purposes. Your right to object is not bound to any formalities. Please find our contact details under Information about Moventum S.C.A. If you would like to know more about data processing at Moventum and what it means for you, please feel free to contact your Financial Advisor.

## Policy Review

- a. The Company must analyze on an on-going basis the complaints-handling related data in order to identify common issues arising from various types of complaints and initiate appropriate actions to make the Complaints redressal mechanisms more efficient and effective.
- b. The Company's policy is assessed and periodically reviewed, at least on an annual basis, or more frequently, should the need arise and any amendments to this policy shall be approved by the Company's Board of Directors. The client shall be notified in writing of the nature of the changes deemed appropriate by law, and the revised policy will be available on the Company's Website.

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