



## PRIVACY POLICY

Luxembourg Enterprise for  
Investment & Wealth Management

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## PRIVACY POLICY

Luxembourg Enterprise for Investment and Wealth Management S.à r.l (“**LEIW**” or “**the Company**” or “**We**”) is strongly committed to protecting your privacy and complying with your decisions on how we use the information you have provided us with. We safeguard both personal and non-personal information you share with us in line with the highest privacy and data protection standards available.

The Company has robust and effective data protection systems in place that comply with applicable laws, data protection principles, and best practices. The present privacy policy (the “**Privacy Policy**”) takes into account the obligations imposed on LEIW under Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons concerning the processing of personal data and on the free movement of such data (“**GDPR**”) and the Luxembourg law of 1 August 2018 concerning the organization of the CNPD (the “**Luxembourg Data Protection Law**”).



## 1 Our commitment to you:

- a. The Company will not share, rent, or sell your information to any third party;
- b. Your information is protected from unauthorised users by appropriate and effective security measures;
- c. You can decide to opt out and are in control of how we use the information you shared with us.

LEIW is committed to complying with the provisions of the GDPR and, as applicable, the Luxembourg Data Protection Law.

Article 5 of the GDPR prescribes that personal data shall be:

- ✓ processed lawfully, fairly and in a transparent manner with the data subject;
- ✓ collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, under Article 89(1), not be considered to be incompatible with the initial purposes;
- ✓ adequate, relevant and limited to what is necessary for the purposes for which they are processed;
- ✓ accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that inaccurate personal data, having regard to the purposes for which they are processed, are erased or rectified without delay;
- ✓ kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes under Article 89(1) subject to the implementation of the appropriate technical and organisational measures required by this Regulation to safeguard the rights and freedoms of the data subject;
- ✓ processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and accidental loss, destruction or damage, using appropriate technical or organisational measures.



## 2 What kind of information does LEIW collect from you?

The Company collects and processes the following information from you:

- **Relating to your identity:** LEIW collects data about your person, such as your first and last name, email address, postal address, phone numbers, or other similar data, such as your date of birth, gender, title, country or preferred language.
- **Relating to your electronic identification:** LEIW uses Cookies to collect data on how you use our website and your interactions with our marketing communications. For example, we will see how often you visit our website, how long you stay on certain pages, which items you clicked on or downloaded, and your IP address. Cookies are described in more detail further below under the section "[\*What are Cookies and how does LEIW use them?\*](#)".
- **Relating to your business relations:** LEIW might take note of your job title, your department, your employer, the size and location of your company, your branches, and whether you are acting as an agent for a third party.
- **Relating to payments:** LEIW will store your transaction confirmations where you have settled an invoice with us, which may include information about your bank, your account and/or any other information, such as failed or delayed payments. We use this solely to receive and record payment obligations towards LEIW under our separate agreement(s) with you.
- **Relating to our business relationship:** Where we are parties to a service agreement, we will also store the information you share with us and/or enter or save on our digital applications. The exact scope of this information will depend on the service and/or product and will be explained to you in more detail in the respective service agreement.



### **3 How will you know when we collect personal information?**

LEIW will inform you when collection of information that personally identifies you and you will have a choice whether you wish to provide us with the personal information or not. Usually, this will be the case when you request to install, download or subscribe to products, newsletters, marketing material, research or other publications from LEIW.

For the avoidance of doubt, the Company will consider any email sent to us, which includes personal information and/or non-personal information, to be provided to us with the understanding and consent that LEIW may use the information you have transmitted to us by email, phone, face-to-face conversation or otherwise for the purposes and in the manner outlined in this Privacy Policy.

Our website uses cookies, which will be notified to you when visiting our website. You will then have the option to accept or decline the use of Cookies on your browser when visiting our website in line with the sections "*What are Cookies and how does LEIW use them?*" and "*Can you opt out?*" further below.



## 4 How will we use the personal information?

The Company uses your personal information for some or all of the following purposes:

- **To provide you with the information you will need to use our products or services;**
- **To customize documents with the information you have provided;**
- To let you know when software upgrades, updates, discounts or other services from LEIW are available;
- To keep you logged in and to save your preferences;
- To provide you with the advice you have requested in our function as your advisor or service provider;
- **Process any orders;**
- Manage your account(s).

The Company collects your email address when you subscribe to any of our products or services to send you informational communications about LEIW's products, services or news which we believe may be of interest to you. This means that LEIW collects your email address to send you our promotional offers.

Where applicable, LEIW may also collect other information, such as your name, language preference, currency and or country, operating system, your activities on our website or digital applications to provide you with a better experience when using our website, products or services.

When you subscribe to any of our products or services, we will collect your email address to send you the necessary information to use or complete your subscription/document use and LEIW will ask you for a telephone number in case there are any issues or topics which LEIW deems easier to be resolved and/or discussed over the phone. The Company will also use your telephone number in case the email address you entered bounces back or if the Company notices unusual activities on our online applications, such as repeated failed login attempts. The phone number and/or email address you provide to us will also be used where the Company believes that a data breach has occurred which would compromise the information of your payment method or otherwise pose a high risk to your rights and freedoms.



## 5 What rights do you have concerning us managing your personal data?

- **The Right to Access:** You have the right to access the information we store in line with “Can you access your information?” below. **(Art. 15 GDPR)**
- **The Right to Rectification:** If your information has changed, or we saved it wrong, or you wish to add something, you have the right to request us to rectify/complete our records. Requests in this respect should be sent to [gdpr@LEIW.com](mailto:gdpr@LEIW.com). **(Art. 16 GDPR)**
- **The Right to Erasure:** You have the right to request us to erase some or all of the personal information we have stored about you. Requests should be sent to [gdpr@LEIW.com](mailto:gdpr@LEIW.com) and the Company will endeavour to complete your request within one month of receiving it. **(Art. 17+19 GDPR)**
- **The Right to Restrict Processing:** You have the right to restrict the processing of some or all of your personal data under certain conditions. Requests shall be sent to [gdpr@LEIW.com](mailto:gdpr@LEIW.com). **(Art. 18+19 GDPR)**
- **The Right to Object to Processing:** You have the right to object to us processing some or all of your personal data in certain circumstances. Requests should be sent to [gdpr@LEIW.com](mailto:gdpr@LEIW.com). **(Art. 21+22 GDPR)**
- **The Right to Data Portability:** You have the right to request that we transfer the data we have stored to another organization, person, or directly to you, under certain conditions. Requests should be sent to [gdpr@LEIW.com](mailto:gdpr@LEIW.com). **(Art. 20 GDPR)**
- **The Right to Complain:** You have the right at all times to complain with regarding the processing of your data, whether to LEIW or directly to a national data protection authority of a European Union Member State. **(Art. 77 GDPR)**



## **6 Do you need to consent to the use of your personal information?**

When you provide us with your personal information, you consent that it can be used by LEIW in line with this Privacy Policy and/or the terms of any agreement(s) LEIW has in place with you in addition to this Privacy Policy. By providing us with the information, you consent to LEIW being an authorized holder of the information you provided to us. You are free to choose whether you want to provide us with your personal information, but, if you decide not to provide us with certain information, you might not be able to use some of the services or products we offer, and you will not be able to receive additional services or access certain areas of our website which require registration. When subscribing to our products, newsletters or other services, you consent to us using your email address and/or telephone number to occasionally contact you with promotional material, software updates, newsletters or event invitations. In each communication, you will be able to unsubscribe from further promotional communications, or you can contact us to let us know by sending an email to [gdpr@LEIW.com](mailto:gdpr@LEIW.com) that you no longer wish to be contacted with all or certain communications.





## **7 Can you access your information?**

You have the right to review the personal information you have provided us with to ensure that it is accurate and current. To review or update this information, go to the Settings section of your subscribed online service or request that we send you this information via emailing [gdpr@LEIW.com](mailto:gdpr@LEIW.com).



## **8 How do we protect your personal information?**

LEIW is committed to ensuring that the personal information you give us is safe and that your decision about if, and which, information you wish to share with us, is respected. We have strong security in place to protect your data from being lost, misused, accessed by unauthorized users, disclosed, altered, or destroyed. All our sensitive data are stored behind several firewalls on a secure server with restricted access.

We do not operate an online shop and all payments will be done through bank transfers only, meaning we will not ask you for any credit card or bank details through our website.



## **9 How long are we allowed to keep your personal information?**

Unless you tell us otherwise, we will keep your information as long as we are providing services to you and/or as long as we believe that our promotional materials and/or newsletters are of interest to you, subject to applicable data retention rules under Luxembourg law. To comply with the law, especially to prevent fraud, resolve disputes, troubleshoot problems, assist with investigations, enforce the terms of our agreement(s) or take any other actions permitted by law, we will keep your personal information even if your account has been deleted. We may use some or all of your personal information for confidential statistical purposes. Any information retained will be handled in compliance with this Privacy Policy.



## 10 Are you located in the EU or the EEA?

For those who are habitually located in the European Union or the European Economic Area, you have the right to access, rectify, download or erase your information. You are also entitled to restrict or object to certain processing of your information. Some rights in this respect apply generally, while others apply in certain circumstances.

You have the right to access your personal information and, if you want, have it amended, deleted or restricted. In some cases, you also have the right to the portability of your data. You can also ask us to not send you certain marketing communications and to not use your personal information for direct marketing purposes. Each email will allow you to opt out of some or all marketing communications. Transactional account messages, such as our direct correspondence with you, or administrative emails, such as reset passwords, will not be affected by your choice to opt out of marketing communications.

The rights described in this section correspond to the rights described under the section *"What rights do you have concerning us managing your personal data?"* above.



## **11 Can we share your personal information with others?**

Your information is never shared with anyone outside of LEIW unless you provide us with your permission beforehand. Within LEIW, your personal information is only accessible on a “need to know” basis and is not openly available to everyone within the firm.

When you register, we will ask for your email address and some other contact information, depending on your subscription. We will use this information to send you confirmations, and feedback on your requests, and to send you information about our services or products. When you provide us with your postal address, we will only use this address to send you personalized correspondence or invoices.

When sending you these documents, we will be required to share your address with third parties to send it to you by post. In some instances, we might have to share some information with third parties where this is required for the rendering of the service you have ordered, such as printing tickets or name tags with your name, title and company, for example for LEIW events. Any third party in this respect will be bound by confidentiality rules and is prohibited from using your information for any other purpose.

In very rare cases, LEIW might be required to disclose your personal information, without notice, if required to do so by law, during legal proceedings, to protect and defend LEIW or act in urgent circumstances to protect the personal safety of the users of our website and products or the public.

This includes sharing your information with third parties who issue credit references or are debt enforcement agencies. When enforcing payments due to us, we will inform you in the payment reminder that we may appoint a debt enforcement agency.



## 12 What are Cookies and how does LEIW use them?

Cookies are text files placed on your computer to collect standard internet logs and visitor behaviour information. This means that if you visit our website, we may collect information from you automatically through Cookies or similar technologies.

At LEIW, we use cookies in a range of ways to improve your experience on our website so that, for example:

- **You can stay signed in;**
- **We understand how you and others use our website;**
- **So that we can save your preferences, such as your language or location;**
- To collect information about your visit, the content you view, the links you clicked on, device type, IP address and so forth, so that we understand client behaviour better for statistical and marketing purposes.



### **13 Can you opt out?**

You have the right to opt-out from receiving updates, newsletters and other communication from us by using the “unsubscribe” button at the bottom of each email or by sending an email to [gdpr@LEIW.com](mailto:gdpr@LEIW.com).

In the case of Cookies, you can choose not to accept Cookies. The instructions for this will depend on the browser you use. In case Cookies are disabled, some of our features might not work, or they might not work as well as when Cookies are enabled.



## **14 Does our Privacy Policy apply to website links of affiliates on LEIW's website?**

This Privacy Policy only applies to our website ([www.LEIW.com](http://www.LEIW.com)). If our website contains links to other websites, we are not responsible for the actions of these third parties, including their privacy practices and any content they post on their websites. We recommend that you review the privacy policies of the third-party websites and learn more about it, how, and why, they collect your personal information.





## **15 Can we change this Policy without you knowing?**

If we make changes to this Policy that affect how we use your personal information and which poses a high risk to your rights or freedoms, we will notify you by email. For minor changes to refer to legal updates or similar amendments, the revised version of our Privacy Policy will be available on our website as of the date on which the new Privacy Policy enters into effect.



## 16 What if you do not believe that the Policy is adequately enforced?

If, for whatever reason, you believe that LEIW is not adhering to the principles outlined in this Privacy Policy, please send us an email to [gdpr@LEIW.com](mailto:gdpr@LEIW.com) and we will do our best to rectify the situation as soon as possible.

If you believe that this is not an option for you, you have the right to complain with the *Commission Nationale pour la Protection des Données* (the "**CNPD**") should you be of the view that your data is being processed in a way that does not comply with GDPR.



## 17 What if you have questions or comments?

For any questions or comments you have about our Privacy Policy, please email us or write to us at:

**LEIW | Luxembourg Enterprise for Investment and Wealth Management**

**Attn:** *Data Protection Officer*

16, Rue Robert Stümper

L-2557 Luxembourg,

Grand Duchy of Luxembourg

[gdpr@LEIW.com](mailto:gdpr@LEIW.com)

This Privacy Policy is reviewed regularly and is in force as of June 2024.