

DATA PRIVACY POLICY

I. Introduction

Scope

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, General Data protection Regulation (GDPR), Axiom Alternative Investments and its Italian branch (Axiom), AXM Alternative Investments (AXM) and the Funds managed by Axiom or AXM (The Funds) all together designated in this policy as 'The Entities', 'We 'Us', 'Our'. The entities being the controllers, one the processors and recipients of personal data inform the natural persons on the collection, process and keeping of personal data in the course of a business relationship.

Definitions

'Processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

'Controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

'Recipient' means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not.

'Third party' means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

'Consent' of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

'Cross-border processing' means either: (a) processing of personal data which takes place in the context of the activities of establishments in more than one Member State of a controller or processor in the Union where the controller or processor is established in more than one Member State; or (b) processing of personal data which takes place in the context of the activities of a single establishment of a controller or processor in the Union but which substantially affects or is likely to substantially affect data subjects in more than one Member State.

'KYC' means Know Your Customer and sometimes Know Your Client. KYC or KYC check is the mandatory process of identifying and verifying the client's identity.

'Politically exposed person or PEP' is defined as someone holding a prominent public position who is entrusted with prominent public functions.

'Relatives and close associates', sometimes referred to as 'PEPs by association generally share a family connection or may be joint beneficial owners of an entity in which a PEP has an interest.

'Beneficial owner' is the individual who holds, directly or indirectly, more than 25% of the shares, the voting rights or a equivalent power of decision in a company.

'Asset freezing' means that it is generally prohibited to deal with the frozen funds or economic resources, belonging to or owned, held or controlled by a designated person.

II. Personal data collected

This is a list of data which We may collect through emails, documents received, or forms completed.

- Copies of identification documents
- Content of identification documents
- Contact information such as email, address, phone number, social media profile name
- Utility bill
- Cv and cv content
- Job description, job title or power of attorney to act on behalf of other natural persons or a company
- Tax identification number
- Name, date of birth or address of persons identified as closed relatives in news and sanctions databases we may consult.
- Percentage of holdings in legal structures.
- Website information such as page consulted, statistics on page consulted, country, type of investor (professional or retail) and language preference.

III. Source of data

Data We may collect are :

- provided by you at our request to ensure our legal and regulatory obligations related to promotions of brand or product, or anti money laundering and terrorism financing (AML-TF).
- Gathered through public sources available on the Internet.
- Issued from paid data base which gather public information from different sources and process them in a way to enable Us to ensure our legal and regulatory obligations regarding anti-money laundering and asset freezing.

IV. Sharing personal data with third parties

We are committed to the protection and privacy of your personal and financial information. The Entities will not share such information with any affiliated or nonaffiliated third party except:

- When necessary to complete a transaction in a customer account, such as with the clearing firm or account custodians.
- When required to maintain or service a customer account.
- To resolve customer disputes or inquiries.
- With persons acting in a fiduciary or representative capacity on behalf of the customer.
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the firm.
- In connection with a sale or merger of Our business.
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims or other liability.
- To comply with federal, state or local laws, rules and other applicable legal requirements.
- In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement.
- Replying to an official requests from a public or judicial authority.

- Defending our legal rights in cases of dispute (providing evidence).
- Optimizing and developing our products or services and improving our risk management.
- Improving quality and performance of our systems and our products and services.
- Developing products, training and similar administrative purposes.

V. Transfer of data

The Entities are domiciliated in France, Italy, Switzerland, United Kingdom and Luxembourg.

Data may be shared between the Entities when performing our activities or for any of the reason detailed in “sharing personal data’ paragraph.

When data are shared outside of the European Union, We make sure that GDPR principles are respected.

VI. Data keeping

In line with our regulatory and legal obligations, we maintain personal data related to KYC or any regulatory matter for at least 5 years from the end of the business relationship or the last operation.

We may be required to keep documents including personal data by commercial or civil law for more than 5 years.

VII. Rights

Opt-out _ It is not our policy to share nonpublic personal and financial information with affiliated or unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted above is necessary for the activity or is mandated by law, there are no allowances made for clients to opt out.

On the contrary, regarding data processing for which you gave your prior consent such as marketing communications through emailed newsletters for example, you can choose to withdraw your consent.

Access _ You have the right to obtain confirmation as to whether or not personal data concerning him or her are being processed and if yes how and which data are being handled.

Rectification and Erasure _ You have the right to ask for deletion of your personal data and for correction. Your request will be analyzed taking into account our legal and regulatory obligations.

Restriction of processing _ Can be applied within the conditions detailed in article 18 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, General Data protection Regulation (GDPR).

VIII. Contacts

- Controllers and processors : The entities
- Controller representative : Axiom Alternative Investments SARL
- Contact :

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