

# PRIVACY POLICY

In accordance with the Belgian and European privacy regulations (respectively the law of 30 July 2018 on the protection of natural persons in relation to the processing of personal data and the European general data protection regulation 2016/679 of 27 April 2016) this section aims to inform you on the privacy policy applied by Mercier Vanderlinden Asset Management.

## 1 WHO PROCESSES YOUR PERSONAL DATA?

The entity responsible for the processing of your personal data is the limited liability company governed by Belgian law Mercier Vanderlinden Asset Management, with registered office located at 2018 Antwerp, Lange Lozanastraat 254, registered under number RPR Antwerpen0472.814.523.

You can contact us via the following general contact data:



E-mail : [info@mvam.be](mailto:info@mvam.be)



Fax: +32 (0) 3 401 70 00



Tel: +32 (0) 3 270 75 75

The contact person for questions or complaints in relation to the processing of personal data is Axelle Van den broeck, who can be reached directly via [dataprotection@mvam.be](mailto:dataprotection@mvam.be) and by phone on number 03 270 75 75.

## WHICH PERSONAL DATA DO WE PROCESS?

Prior to entering into any portfolio management agreement, we necessarily need to request and process your personal data. We will not request any other personal data from you than those needed for this agreement. In case such data are not provided, we are however not able to enter into this agreement with you.

In practice, we require at least the following data:

Name

National registration number/ identity card number/ passport number

Residence and place of birth

Family status

Contact details (phone number and e-mail address)

Account number

Information with respect to the composition and origin of the portfolio entrusted in management

Data to determine your investor profile: education, financial situation, investment preferences, risk-aversion, capacity to suffer losses, experience with investments and knowledge of financial instruments

We also require information from third parties who have a relationship with you as a client from a certain capacity, right or claim, in particular from legal and / or statutory representatives, beneficial owners and partners. For legal persons, this information includes at least the name, the national register number / identity card number / passport number, the residence and place of birth and for partnerships also the family status and contact details of the partners.

### 3 WHY ARE YOUR PERSONAL DATA PROCESSED?

We process the personal data listed above as this is required in execution of our agreement with you. In the context of this agreement we will also provide you with reports on the financial instruments that you opted for.

Your personal data are also used for our internal statistics of the client database. Finally, we can, with your consent, use your contact details to invite you to events or presentations or to send you newsletters. You can however withdraw your consent with this at any time.

### 4 ARE YOUR PERSONAL DATA SHARED WITH THIRD PARTIES?

Your personal data are never sold nor transmitted to third parties for commercial purposes.

These are the only manners in which your personal data can be transmitted to third parties:

There is a legal obligation for us to transmit the personal data in the context of (the prevention of) fraud and abuse.

We call upon third parties in order to execute part of our agreement with you, in which case we ensure that these third parties also comply with this privacy policy.

### 5 HOW LONG WILL YOUR PERSONAL DATA BE STORED FOR?

Due to legal requirements we have to keep your personal data for maximum ten years after the end of the client relationship.

Personal data on potential customer prospects are kept for a maximum of two years unless, in the meantime, there has been contact with the prospect. In that case, a new maximum two-year period starts. Prospects can always ask for their personal

data to be removed.

## WHAT ARE YOUR RIGHTS?

You have different rights, that you can exercise by contacting us via the contact details mentioned above.

Access to personal data in relation to you and which are processed by us, and, as the case may be, the right to request rectification of incorrect personal data or erasure of personal data, as well as the right to request restrictions with respect to the processing of your personal data.

The transfer of your personal data either via the provision thereof in a machine-readable format, or via the direct sending thereof, to the third party service provider designated by you.

Your objection to the use of the personal data for purposes of direct marketing (event invitations) or the sending of newsletters, in case you agreed previously.

The filing of a complaint with the supervisory authority, in case you are not satisfied with the handling of your question or complaint with us, via the following channels:

*Data Protection Authority*

*Drukpersstraat 35, 1000 Brussel*

*Tel: +32 (0)2 274 48 00*

*E-mail: [contact@apd-gba.be](mailto:contact@apd-gba.be)*

## PERSONAL DATA OF PERSONS WHO ARE NOT YET CLIENTS

With respect to persons that did not yet enter into a portfolio management agreement with us, but who are interested in our financial instruments, the above provisions are applicable per analogy.



**MERCIER  
VANDERLINDEN**

Lange Lozanastraat 254 – B-2018 Antwerpen  
Tel +32 (0)3 270 75 75 - Fax +32 (0)3 401 70 00  
[www.merciervanderlinden.com](http://www.merciervanderlinden.com)  
RPR Antwerpen BTW BE 0472 814 523