



BELLATRIX

ASSET MANAGEMENT

GDPR

Regulation 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 on the free movement of such data, repealing Directive 95/46 / EC (General Data Protection Regulation - "GDPR" or "the Regulation"), which will come into force on May 25, 2018, aims to strengthen and improve the protection of your personal data.

Broadly applied, it concerns both entities that operate in the European Union and those that collect data or offer services to citizens of the European Union.

In this context, your personal data can not be collected, stored, used and their transmission can be carried out only in accordance with the aforementioned regulation, in good faith and in a transparent way, for specific, explicit and legitimate purposes without this treatment can not be incompatible with those purposes.

Bellatrix Asset Management has adapted its administrative organization and internal governance system allowing the strengthening of existing measures, thus guaranteeing a level of protection of your data, adjusted to their typology on the one hand and the provisions in force on the other hand.

Your personal data will not be kept longer than necessary for the fulfillment of the purposes for which they are collected and processed.

The processing of your personal data involves any transaction or set of operations performed or not using automated processes and applied to data or sets of personal data, such as collection, registration, processing organization, structuring, preservation, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of provision, reconciliation or interconnection, limitation, erasure or destruction.

The regulation grants you a certain number of rights among which, the right of information as to the methods of treatment of your personal data; their motives and purposes, the right of access, rectification, the right to be forgotten, to portability, to challenge a decision taken on the basis of automated processes, opposition, limitation.

Concerned about your satisfaction and the respect of your rights, Bellatrix Asset Management has appointed Mr. François Haquenne as responsible person in charge of determining the purposes and means of the personal data processing specific to all employees and customers of the company. company, from which you will be able to exercise your rights and / or obtain further information



BELLATRIX

ASSET MANAGEMENT

Bellatrix Asset Management

Monsieur François Haquenne

Either by fax to the following number: +352 26 25 66 24

Or by mail, to the following address: info@bellatrix.lu

In certain circumstances, it is possible that your data are collected, processed and in fact accessible to service providers involved in the business relationship that binds us, for the benefit of the latter, for the purposes of the performance of the contract to which you are party, either for the performance of pre-contractual measures that we have received from you or, in the light of compliance with a legal obligation to which the company is subject or for the purposes of the legitimate interests pursued by Bellatrix Asset Management.

Your personal data will not be transmitted, except in the circumstances mentioned above, sold, exchanged or rented to anyone, except information and prior agreement on your part or in the context of legal proceedings.

Given the volume and scope of activities provided by Bellatrix Asset Management, it was decided not to appoint a Data Protection Officer (DPO), considering that they do not have the status of a public body, nor activities leading to regular and systematic monitoring of large-scale persons or large-scale processing of so-called "sensitive" data or relating to criminal convictions and offenses as more fully detailed in Article 10 of the Regulation.

For more information, we invite you to contact the controller.

An answer will be provided to you as soon as possible and in any case within one month from the receipt of your request. If necessary, this period may be extended by two months given the complexity and the number of requests. In the latter case, the controller will inform you of this extension and the reasons for the delay within one month of receipt of the request. You may submit a complaint about the processing of your personal data to the controller and / or the National Commission for Data Protection:

1, avenue du Rock'n Roll, L-4361 Esch-sur Alzette

www.cnpd.public.lu