



# DATA PRIVACY POLICY - GDPR

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## DATA PRIVACY POLICY - GPDR

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This data privacy policy explains how personal data about our clients, prospective clients, business contacts, partners, providers, professional advisors (and their workforce) and others with whom we do business may be collected, used, processed and maintained by Olympia Capital Management S.A. and its mother company Ambroisie Capital Holding SAS (these two entities being herein designated together by “we” or “us”).

We may review this policy from time to time, and any changes will be available to you by posting an updated version on this website. We recommend that you regularly check for changes and review this policy whenever you visit our website.

Personal data is any information about a living individual from which they can be identified directly or indirectly in particular by reference to an identifier such as, name, identification number, location data, any online identifier, or any factor specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

We will collect and process only personal information that is necessary in respect of the relevant purposes. Your personal information will be used and processed according to specific purpose(s), particularly in order to cope with contractual obligations and legal and regulatory duties.

### **We may collect and process:**

- Information you give us, including your name, gender, address, personal or professional email address and personal or professional phone number, financial information, patrimonial information, beneficial ownership, personal description, ID documentation, professional activity,
- You or your employer/entity/group may give us similar information about you during our relationship including by exchanges via phone, email or other electronic means, or in writing.
- We are part of a group of companies and we may receive relevant personal information from our subsidiaries and/ or affiliates for the purposes of our services.
- We work closely with third parties (for example, banks, investment firms, and other financial institutions, business partners, sub-contractors) and may receive information about you from them.
- If you provide personal information to us about any person other than yourself, such as other employees of your employer, you must ensure that they understand how their information will be used, and that they have given their permission for you to disclose it to us and for you to allow us, and our providers, to use it.

You provide us voluntarily personal information, either (i) through this website if you request the creation of your personal account within this website or, (ii) when you provide us documentation and information required to contract with us, or when you subscribe one of our services, or when you subscribe and/or sell shares/units issued by investment funds managed and/or advised by Olympia Capital Management SA, or (iii) by exchanging information with us. You will also provide us personal documentation and information when such documentation/information is required by applicable laws and regulations, including when we need to assess your (and your employer/entity/group) activities, financial needs, experience and knowledge and other criteria; or to respect KYC (know your customer), AML (anti money laundering and terrorist financing), MIFID (markets in financial instruments) legislations ... and other financial or taxation legal and regulatory duties. It is important that you provide us with all such necessary information and documents or this may affect our ability to provide services.

We may also collect information about you from publicly available sources when this is relevant.

### **Purposes and Legal Basis for using and processing personal information**

We may use and process your personal information where you have given your consent. This may include to sign-up to receive communications from us (such as newsletters or invitation to events), inviting you to refresh your personal information, inviting you to meetings.

We may use and process your personal information in relation with a contractual relationship:

- where we supply you or your employer/entity/group and/or we have supplied you/them services,
- where you or your employer/entity/group hold and/or have held directly or indirectly any share and/or unit of any investment fund managed and/or advised by Olympia Capital Management SA.
- where we have contracted with you or your employer/entity/group, or where you or your employer/entity/group have contracted with any investment fund managed and/or advised by Olympia Capital Management SA,
- where you or your employer/entity/group request information on Olympia Capital Management SA, its group of companies, or its/their services and/or products, or on any investment fund managed and/or advised by Olympia Capital Management SA,
- where we are in negotiation with you or your employer/entity/group,
- where you or your employer/entity/group supply and/or have supplied/sold to us and/or to any entity affiliated to us and/or to any of the investment funds managed and/or advised by Olympia Capital Management SA products and/or services.

In such situations we will use and process your personal information in connection with the relevant relationship, including to meet our, your and/or your employer/entity/group, and third parties obligations under contract and under applicable laws ruling such contractual relationship. We will transmit and/or share your personal information to/with providers, subcontractors and third parties that are necessary for providing you (and your employer/entity/group if relevant) the services. For instance when you or your employer/entity/group subscribe shares/units of investment funds managed/advised by Olympia Capital Management SA, we may need to share whole or part of your personal information with brokers, central depositories, custodians and other financial providers. If you are working for a provider (to us or and/or to any entity affiliated to us or to the investment funds managed and/or advised by Olympia Capital Management SA), we may transmit and/or share

your personal information to/with providers, subcontractors and third parties that are necessary to use the concerned services.

We may use and process your personal information to comply with our legal and/or regulatory obligations, including in order to cooperate with any jurisdiction, governmental agency, regulatory authority, tax authority, or other public authority, including in circumstances where we are not permitted to tell you of such disclosure.

We may use and process your personal information where it is necessary for us to pursue our legitimate interests as a business, or that of a third party. This may include marketing and business development activities (other than where we rely on your consent as described above), to analyze your or your employer/entity/group expectations, to enhance your client experience, to make quality review, to communicate with you and your employer/entity/group, to verify the accuracy of your data, to better understand your needs. This may also include to analyze your services/offers and the service/offers of your employer/entity/group, to prevent fraud, to administer the relationship with you and your employer/entity/group, to monitor accounting, taxes, invoices and payments, to manage public relations, queries, complaints or claims, risks and litigations, to establish, exercise and defend legal rights (including via voicemails, emails, correspondence), to maintain and protect our equipments, IT infrastructures, this website and data ... We may use personal data in connection with any legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation), including to defend our rights.

## Recipients

We limit access to your personal information to those members of our workforce who have a business need to know them in line with their job and our activities, being clear that each of them is subject to a duty of confidentiality. We may share your personal information with our subsidiaries and affiliates. We may also disclose/share your personal data:

- when necessary, with providers, such as IT service providers, advertising agencies, administrative providers, accountancy providers, legal and other professional advisers, banks, custodians, financial firms, investment managers, financial institutions, ...
- when necessary, with your employer/entity/group and with business partners, and sub-contractors,
- to relevant persons and advisors in connection with a reorganisation or combination of Olympia Capital Management SA or its mother company with another firm or other firms,
- in order to comply with a judicial proceeding, court order, or a regulatory or supervisory, or government or public authority inquiry, or request,
- when we are under a duty to disclose or share it in order to comply with any legal or regulatory obligation (including tax), or to detect or report fraud or criminal offence,
- when we need it to enforce and/or protect and/or defend our rights and property.

We will disclose to our providers only personal information that is necessary for providing the relevant services. If you are working for a provider or sub-contractor to us or to the investment funds managed and/or advised by Olympia Capital Management SA, we will only disclose your personal information to other third parties when this is necessary for us to run our activities and to provide our services.

## Security - Accuracy

The servers of Olympia Capital Management SA and Ambroisie Capital Holding SAS are located in France. This website is hosted by OVH SAS from physical sites located within France. The IT back-up providers that we use to implement our recovery plan are also located in France. We may store your personal information on these servers and/or in our hardware. We take technical and organizational security measures to protect against unauthorized access, improper use, alteration, destruction and accidental loss of your personal information.

Unfortunately, the transmission of information via Internet is not completely secure. Although we will try to protect your personal information, we cannot guarantee the security of your information transmitted to us via Internet, and you undertake such transmission at your own risk. This website may contain links to other websites run by other organizations. This Privacy Policy does not apply to those other websites. We invite you to read their privacy statements/policy.

The accuracy of your personal information is important to you and to us. It is important that you inform us of any updates to your contact details or other personal information. Please inform us of such changes by sending a letter to Olympia Capital Management SA – Client Service - 41, avenue George V 75008 Paris – France, or an email to: [investorrelations@olympiagroup.com](mailto:investorrelations@olympiagroup.com)

## How long we retain personal information

As Olympia Capital Management SA activity is regulated, and where it has provided you financial services or you have invested in investment funds managed and/or advised by Olympia Capital Management SA, your personal information will be retained and used for the duration of the relevant contract but also for the duration required by applicable laws and regulation. For the other purposes, we will retain and use your personal information for the relevant period of time in line with the concerned purpose and in conformity with French personal data protection laws, without prejudice to automatic IT back-ups. However, we may be committed to keep such personal information for a longer period of time where applicable laws and/or regulation request so or when we have a legitimate interest to keep holding them.

## Cookies

When you visit any website, it can store or retrieve information from your device, usually in the form of cookies. A cookie is a text file that is saved on the user's terminal (such as your computer, tablet, smartphone) when viewing an online service through your internet browser. A cookie file allows its issuer to store user data, which can in particular facilitate navigation, allow certain functionalities during the period of validity or storage of said cookie and allow data to be retrieved. This information may be about you, your preferences or your device.

The cookies we use on the website [www.olympiagroup.com](http://www.olympiagroup.com) are:

- An authentication cookie (identification tracer) which is strictly necessary for the operation of the website when you wish to access the private part of the website,
- A cookie to identify and store the language option you have selected for this website (interface customization tracker),
- A cookie to identify and store the fact that you have read the description of cookies (interface personalization tracker).

The authentication cookie that we use is created when you want to access the private part of the website. This cookie is only of a technical nature and is necessary to access the private part of the website using identifiers and the data that you have previously communicated to us for this purpose. We do not recommend that you delete this cookie.

Interface personalization cookies are not essential for browsing our website, but allow it to function efficiently and make your use of the website more fluid. These cookies remain active for less than two months.

You have the option of prohibiting the deposit of cookies on your terminal, including technical cookies, by configuring your browser. However, blocking our technical cookies may prevent you from accessing some of the features of our website. If you wish, you can also delete cookies on your terminal after each visit to the website.

We do not use cookies on this website to analyze your browsing, statistical and audience measurement cookies, advertising cookies or social media cookies.

## Marketing

We may collect and use your personal information for marketing and business development purposes with your consent or on the basis of our legitimate interests. We may collect your preferences to receive marketing information from us by using contact details provided via this website, or via an exchange of emails or through contact with you or your employer/entity/group. From time to time, we may send you an email to update your contact details and preferences regarding which types of communication you receive from us. From time to time, we may also ask you to refresh situation, by asking you to confirm that you consent to continue receiving information from us. You have the right to opt-out (at any time) of our use of your personal information for marketing purposes (as described below).

## Your rights

Should you contact us in relation to your personal data we may hold, we may ask you to confirm your identity and to provide relevant identification document. Except in rare case, we will respond to you within one month (from cumulative reception of your request and the relevant identification document).

In accordance with applicable law, you can exercise your rights of access and rectification, which allow you to rectify, supplement, update or delete personal data that are inaccurate, incomplete, ambiguous, outdated or of which the collection, use, communication or storage is prohibited, as well as the right to request the limitation of the processing, and the right to object to the processing of your personal data on legitimate grounds. You have the right, at any time to object to the processing of your personal data for commercial marketing purposes. You have also the right under certain circumstances to request the portability of some of your personal information to third parties in a structured common format. In some countries like France, you have also the right to give general or specific instructions on how to process your personal data after your death.

You also have the right to file a complaint with the competent national data protection authority. Although you have the right to complain to the data protection authority, we encourage you to contact us first with a view to letting us help in resolving any issues, concerns or questions.

## Contact us

To exercise the rights listed above you are invited to send your request accompanied by a proof of your identity by letter to Olympia Capital Management SA – Client Service 41, avenue George V 75008 Paris – France, or by email to the following address: [investorrelations@olympiagroup.com](mailto:investorrelations@olympiagroup.com)