



**IN APPLICATION OF REGULATION (EU) 2016/679
ON DATA PROTECTION ("GDPR")**

DATA PROTECTION ADDENDUM ("DPA")

This DPA fully forms part of the Agreement between the party identified in the Agreement ("**Client**") and Atdomco, and applies to the execution of the so-called Agreement. All capitalized terms not defined in this DPA will have the meanings set forth in the Agreement.

1. Preamble

GDPR entered into force on 25 May 2018 and affects all companies, authorities and natural persons who process data relating to identified or identifiable natural persons. GDPR also applies to companies, authorities and natural persons who are located or domiciled outside the EU, provided the data subject (natural person being the owner of the processed data) is located in the EU and the Processing of such person related data occurs in the context of the offering of goods or services to natural persons in the EU or the observation of the behaviour of natural persons in the EU.

By way of this DPA, Atdomco implements the necessary amendments regarding the application of the policies brought by GDPR.

2. Processing of data and collection of information

Regarding the application of the regulation, both parties have obligations/rights regarding the personal data treated by Atdomco.

2.1. Type of information

These are the types of information that Atdomco is willing to process for the execution of the terms specified within the Agreement:

- **Demographic data** (Name, gender, date of birth, age, nationality)
- **Contact details** (Phone/mobile number, home/professional address, personal/professional email address)
- **Financial Data** (Bank account number, bank statements, banking transactions)
- **Official identifications** (Passport/Identity copies, Public registration number, driver's license, tax number)
- **Criminal records and political orientation** (Criminal records, political orientation or association can be revealed by client identification process)

2.2. Processing treatment

Atdomco should process on the collection of this information by executing its business purposes in different ways:

- due diligence and on-boarding requirements
- collection and filing of documentation, questionnaires, agreements, registers and transfer of all these if needed (or reception from a former provider)
- communication and correspondence (mail, phone call, courier, etc...)

- collection of information from third parties (parties we are or you are related to, submitted to your authorization as assets managers, advisors, etc…) or from publicly known information

2.3. Data provider – Data collector

All data should be collected by Atdomco and given by the Client. Although, with the Client approval and consent Atdomco might collect data from third parties and from publicly accessible source.

2.4. Justification of collecting

Atdomco will collect data for legitimate purpose and to execute its diligences by several means:

- provide services according to the terms agreed by the parties
- meet compliance, legal and regulatory obligations (anti-money laundering (“AML”) and anti-fraud checks on transactions and activities, etc.)
- keep electronic correspondence for fraud prevention, AML processing, business analysis and internal compliance purpose
- meet any other need in the use of personal information that can be judged useful regarding business relationship or the execution of the mission that Atdomco is mandated for.

Not collecting this personal data could lead to some misconduct of Atdomco’s work and could imply that Atdomco might not be able to meet its diligence regarding the execution of the Agreement.

This collection is also justified by legal means as described below:

- compliance with legal obligations
- execution of an agreement
- legitimate interests
- consent

3. Information security

All data processed by Atdomco is submitted to a security process in on order to meet the GDPR requirement. All security measures are taken to prevent any breach, interference or unauthorized disclosure and to protect the client data.

3.1. IT measures

Atdomco ensures that all provided and/or collected data is encrypted in a private and secured cloud protected by firewall and the IT system is fully functional and respects the security minimal requirements.

3.2. Office measures

Atdomco ensures that physical personal data are held outside current and running files in the locked box. The access to its business offices are secured and the client files are keep under surveillance and regular check of the responsible of the so-called file.

3.3. Breach

In case of allegeable breach in the security of the personal information, Atdomco is committed to reveal it to the client and to take any measure to fix the issue and revert to the supervisory authority if needed.

4. Treatments

4.1. Disclosure

Personal data may be disclosed to Atdomco business partners or affiliates in order to proceed with the services provided within the limits of the law which may include:

- services providers we hired on your behalf
- other clients you are related to (in an internal way)
- services providers of clients you are related to
- authorities and legal institutions
- any other institution we are required to send information by law

Any other legitimate disclosure will be brought to the client's attention and submit to its consent. Any other mandatory or legal disclosure will be also brought to attention.

4.2. Transfer

It may occur that Atdomco have to transfer the data of the clients according to its demand outside the European jurisdiction where the regulation on data protection cease to apply and where there might not be such regulation or equivalent. Atdomco ensures that diligences applicable for GDPR will still be practiced.

4.3. Retention

All collected data should be kept during the whole time of the business relationship and a period after that could vary. This period shall be a least of 5 years after the end the Agreement but data could be held for a longer period depending on the type of documentation it is (see the GDPR and preconisation of the Commission Nationale pour la Protection de Données ("CNPD")) or if it is subject to outstanding complaints, litigation or investigation but will not detained any information longer than needed.

4.4. Deletion – Correction - Restriction

The EU regulation on data protection (GDPR) reminds all the right the client has regarding its privacy and its personal information. These rights include the right to access, correct or restrict personal information at any time or ask for deletion of these inputs when/where they are no longer of use or required according to legitimate interests.

Atdomco team will answer the request (mail, post, phone or orally) regarding personal information as soon as it is possible and within a reasonable delay (three weeks maximum) after receipt of the demand.

If it appears that Atdomco is not able to respond within this reasonable delay, Atdomco will inform the client of this matter and make sure that its final response is sent within two months maximum.

Atdomco may ask for verification of the client identity on such matters in order to comply with the regulation and assure full protection of its data.

5. Complaint – Objection

The responsible officer within Atdomco reviews the whole process of collection, holding, use and disclose of personal data.

For any questions about this notice, demand on data, demand on its rights and their application, the client can reach their usual Atdomco contact person, or write to:

Atdomco
Data Protection Officer – Policy Officer
2, Place de Strasbourg
L-2562 Luxembourg

The request shall be handled within the aforementioned rules.

The client may complain about any presumed misconduct, breach or unauthorized disclosure that may have occurred by Atdomco's treatment of personal information within the application of privacy laws and regulations. The complaint shall be sent to the address above. The client may also have the right to lodge a complaint with the supervisory authority managing privacy matters.