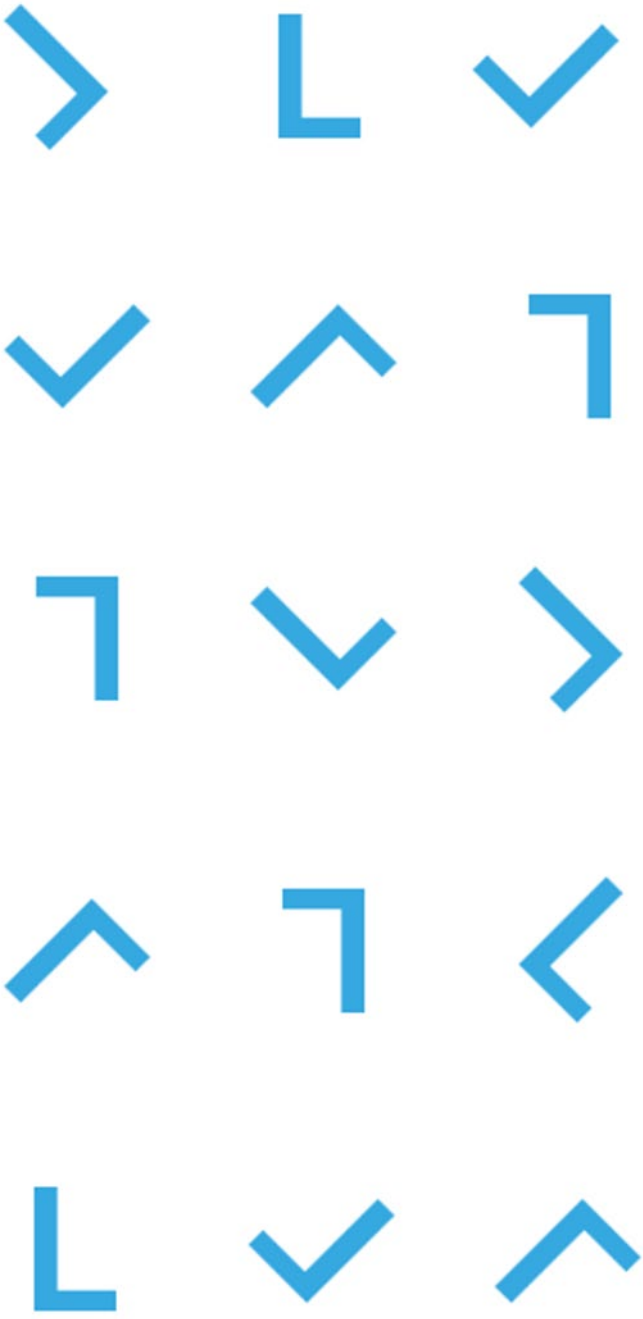


LOGIVER WEALTH MANAGEMENT

Data Protection Notice for Clients

May 2026

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1 INTRODUCTION

LOGIVER places the protection of your personal data at the heart of its business relationship with you. This Privacy Notice explains how we collect, use, share, and protect the personal data of individuals who interact with us in connection with our investment services.

This Notice applies to you if you are:

- A client of **LOGIVER** (including your individual representatives, proxyholders, or authorized signatories)
- A prospective client who has contacted us, attended one of our events, or whose data we have received through an introducer or commercial data provider
- A beneficial owner, related party, or household member whose data we process as part of our anti-money laundering, suitability assessment, or know-your-client checks
- A supplier or service-provider contact person whose data we process for contract management purposes, or
- A visitor to our website (www.logiver.com) or other digital channels we operate.

2 LOGIVER AS A DATA CONTROLLER

LOGIVER is the controller of your personal data within the meaning of Article 4(7) of the EU General Data Protection Regulation (EU) 2016/679 ("GDPR"), read together with the Luxembourg Law of 1 August 2018 on the Organisation of the National Data Protection Commission and the General Data Protection Framework ("Luxembourg Data Protection Law").

2.1 CONTROLLER

LOGIVER S.A. is an investment firm authorized and supervised by the Commission de Surveillance du Secteur Financier ("CSSF") under Article 24-3 of the amended Law of 5 April 1993 on the financial sector, registered at 30 Boulevard Joseph II, L-1840 Luxembourg.

2.2 DATA PROTECTION OFFICER

LOGIVER has appointed a Data Protection Officer, who can be contacted for any question relating to the processing of your personal data or the exercise of your rights under this Notice:

- Postal address: LOGIVER — F.A.O. the Data Protection Officer, 30 Boulevard Joseph II, L-1840 Luxembourg
- Email: dpo@logiver.com
- Telephone: +352 26 97 60 53

3 CATEGORIES OF PERSONAL DATA WE PROCESS

The categories of personal data we process depend on the nature of our relationship with you. They may include :

- Identification data: name, date and place of birth, nationality, identity document details, tax identification number, national identification number, photograph (for KYC purposes).
- Contact data: postal address, email address, telephone numbers.

- Professional and financial data: profession, employer, source of wealth, source of funds, estimated net worth, tax residence, financial experience and knowledge, investment objectives, risk tolerance, loss capacity.
- Banking and transactional data: bank account details, payment instructions, transaction history, portfolio composition, investment performance.
- Compliance and due-diligence data (KYC/AML): politically-exposed-person (PEP) status, sanctions screening results, adverse media findings, criminal record extract.
- Family and household data where relevant to suitability or AML obligations : beneficial owners, authorized representatives, household members.
- Communication data: correspondence with us (email, letter, recorded telephone calls), meeting notes.
- Website (cookies) and technical data: IP address, device identifiers, browser type, pages visited, interactions with our website.

4 WHERE WE OBTAIN YOUR DATA FROM

We collect most personal data directly from the Client, in the context of entering into or performing the contractual relationship. However, we may also obtain personal data from the following sources:

- Introducers, intermediaries, external asset managers, distributors, or other professional partners.
- Public registers (commercial registers, land registers, beneficial-owner registers such as the Luxembourg RBE).
- Commercial data providers for sanctions screening, PEP screening, and adverse-media checks.
- Other **LOGIVER** clients or their representatives, where relationships connect (e.g., beneficial owners of a corporate client, authorized signatories, family members in wealth-structure arrangements).
- Public authorities, in the context of information-exchange mechanisms permitted by law.
- Publicly-available sources (press articles, professional biographies, corporate websites) as part of our due-diligence processes.

5 WHO RECEIVES YOUR PERSONAL DATA

We treat your personal data as strictly confidential. We disclose it only when necessary and only to carefully selected recipients, including:

- **LOGIVER** staff whose role requires access
- Processors acting on our behalf under a written contract meeting sufficient organizational and technical measures to ensure protection of the data subject rights, including: external IT and hosting providers, software vendors, external trustees and accountants, lawyers, notaries, and other legal advisers, providers of KYC/AML screening services, archiving providers, and professional couriers.
- Counterparties, custodians, sub-custodians, brokers, clearing houses, paying agents, and transfer agents involved in the execution of your transactions.
- Competent supervisory and public authorities where disclosure is required by law or by a binding request with which **LOGIVER** cannot lawfully refuse to comply.
- Auditors and internal audit functions.

We do not sell your personal data. We do not disclose your personal data for marketing purposes to third parties outside the **LOGIVER** group without your explicit consent.

6 PURPOSES FOR WHICH WE PROCESS YOUR DATA, LAWFUL BASIS, AND RETENTION PERIODS

We process your personal data for the purposes set out in the table below. For each purpose, we identify the lawful basis, and the retention period.

Purpose of processing	Personal Data Category	Legal basis
Discretionary management of the Client's assets	Identification and contact data; professional and financial data; banking and transactional data; communication data.	Art. 6(1)(b) — necessary for the performance of the investment management contract
Compliance with legal and regulatory obligations, particularly in terms of anti-money-laundering (AML) and counter-terrorism financing (CTF) and tax matters	Identification data; contact data; compliance and due-diligence data (KYC/AML, PEP status, sanctions screening, adverse media, criminal record extract); family and household data (beneficial owners, authorized representatives); banking and transactional data.	Art. 6(1)(c) — compliance with legal obligations
Internal monitoring and the preparation of regulatory reports to authorities	Identification data; professional and financial data; banking and transactional data; communication data; compliance and due-diligence data.	Art. 6(1)(c) — compliance with legal obligations Art. 6(1)(f) — legitimate interest in sound management of **LOGIVER's** activities
Detection and prevention of fraud, business development through direct marketing actions and client events	Identification and contact data; banking and transactional data; communication data; website and technical data.	Art. 6(1)(f) — legitimate interest in protecting **LOGIVER**, its clients, and the integrity of the financial system from fraud and financial crime. Legitimate interest in developing our business relationship with existing clients. Art. 6(1)(a) — consent, where consent is required by law (e.g.,

		prospective clients, electronic communications
Execution and preservation of evidence concerning the Client's financial transactions	Identification data; banking and transactional data; communication data (including recorded telephone calls); professional and financial data.	Art. 6(1)(b) — necessary for the performance of the contract. Art. 6(1)(c) — compliance with record-keeping obligations.
Assessment of the suitability and appropriateness of financial instruments subscribed by the Client	Identification data; professional and financial data (financial experience and knowledge, investment objectives, risk tolerance, loss capacity, source of wealth, source of funds, estimated net worth, tax residence).	Art. 6(1)(c) — compliance with a legal obligations.
Defence of **LOGIVER's** interests in court (litigation, arbitration, and regulatory proceedings)	All categories of personal data relevant to the dispute, including identification data, banking and transactional data, communication data, compliance data, and where applicable special-category and criminal-offence data.	Art. 6(1)(f) — legitimate interest in defending **LOGIVER's** rights and interests.

6.1 RETENTION PERIODS

LOGIVER retains your personal data only for the period necessary to meet applicable legal or regulatory obligations, or for evidential purposes until the expiry of the period during which a judicial or extrajudicial action remains possible, the longest period being considered where multiple periods run concurrently for the same data.

The following minimum retention periods apply by purpose, without prejudice to longer periods required by law or for the establishment, exercise or defence of legal claims:

Discretionary management of the Client’s assets, execution and preservation of evidence of financial transactions, and assessment of suitability and appropriateness: at least 5 years after the end of the business relationship (extendable to 7 years upon request of the CSSF), in line with MiFID II record-keeping obligations and the Law of 5 April 1993 on the financial sector.

Compliance with AML/CTF and tax obligations: at least 5 years after the end of the business relationship or after the date of the occasional transaction, in accordance with the Luxembourg Law of 12 November 2004 on the fight against money laundering and terrorist financing.

Internal monitoring and regulatory reporting: 5 years from the date of the report, extendable in accordance with applicable financial sector legislation.

Detection and prevention of fraud and direct marketing to existing clients: for the duration of the business relationship and for 3 years after its end, or until the Client objects to direct marketing, whichever is earlier.

Defence of LOGIVER's interests in court: for the duration of the proceedings and until the expiry of any applicable appeal or limitation period; in any event no longer than 30 years (legal limitation period for civil claims under Luxembourg law).

At the end of the applicable retention period, determined in particular by the minimum retention periods imposed by applicable laws and regulations, **LOGIVER** will review your personal data. If **LOGIVER** identifies a further purpose and a valid legal basis under applicable data protection laws and regulations, **LOGIVER** may continue to retain your personal data, provided that only the personal data strictly necessary for that further purpose is retained, with appropriate systems and controls implemented in accordance with those laws and regulations.

Where there is no remaining purpose or valid legal basis for the retention of your personal data, **LOGIVER** will dispose of the data in a secure and permanent manner, in accordance with applicable data protection laws and regulations.

7 SPECIAL CATEGORIES OF DATA AND CRIMINAL DATA

Where the nature of our services requires, we may process:

- Personal data relating to criminal convictions and offences, or related security measures within the meaning of Article 10 GDPR, for the purpose of AML/CTF compliance and fraud prevention. Such processing is authorized by the Luxembourg Law of 12 November 2004, the Law of 1 August 2018, and other applicable national legislation, with the safeguards those laws provide.

We apply strict access controls and minimization principles when processing such data: only staff whose role requires it, and only for the minimum period necessary.

8 TRANSFER OUTSIDE THE EUROPEAN ECONOMIC AREA

As a general rule, **LOGIVER** processes your personal data within the European Economic Area (EEA) and does not transfer it outside the EEA on a regular basis in the context of the services provided to you. Where, exceptionally, personal data are transferred to a country outside the EEA, **LOGIVER** ensures that appropriate safeguards within the meaning of Chapter V GDPR are in place. Such safeguards may include adequacy decisions of the European Commission (including, where applicable, certifications under the EU-US Data Privacy Framework), standard contractual clauses adopted by the European Commission, supplementary technical and organisational measures and, where required, a transfer impact assessment performed in line with the case law of the Court of Justice of the European Union (Schrems II) and the EDPB Recommendations 01/2020. You may obtain further information on the safeguards in place and a copy of them by contacting the Data Protection Officer using the details set out in Section 2.2.

9 YOUR RIGHTS

Under the GDPR, you have a number of rights in relation to the personal data we hold about you. These rights, and the conditions in which they apply, are set out below:

1. **Right of access**: to obtain confirmation as to whether we process your data and, if so, to obtain a copy and the accompanying information.
2. **Right to rectification**: to have inaccurate data corrected and incomplete data completed.
3. **Right to erasure**: to obtain the deletion of your data, subject to the exceptions set out in Article 17(3) (notably our legal obligations to retain data for AML, tax, or regulatory purposes).
4. **Right to restriction of processing**: to obtain a suspension of certain processing operations.
5. **Right to data portability**: to receive data you have provided to us, in a structured, commonly used, machine-readable format, and to transmit that data to another controller, where technically feasible and where processing is based on consent or contract.
6. **Right to object**: to object, at any time, to processing based on our legitimate interest, including profiling. You have an unconditional right to object to direct marketing.

7. **Right to withdraw consent**: where processing is based on consent, you may withdraw it at any time. Withdrawal does not affect the lawfulness of processing carried out before withdrawal.
8. **Right not to be subject to a decision based solely on automated processing**: **LOGIVER** does not carry out any automated decision-making at this time. Should this change in the future, our privacy notice will be systematically updated to reflect any new practices, and the safeguards implemented.
9. **Right to lodge a complaint with a supervisory authority**: in particular with the Commission nationale pour la protection des données (CNPD) in Luxembourg, without prejudice to any other administrative or judicial remedy. Further details are provided in Section 10.

To exercise any of these rights, please contact our DPO using the details in *Section 2.2*.

10 COMPLAINTS

You have two complementary avenues to raise concerns about how your personal data is handled.

10.1 INTERNAL COMPLAINTS PROCEDURE (CSSF REGULATION 16-07)

In accordance with CSSF Regulation 16-07, you may submit a formal complaint in writing, in French or English, with supporting documents, to:

- **LOGIVER** — F.A.O. the Chief Compliance Officer, 30 Boulevard Joseph II, L-1840 Luxembourg
- Email: reclamations@logiver.com
- Phone: +352 26 97 60 53

We will acknowledge receipts within 10 working days and respond within one month. If we cannot meet the one-month deadline, we will inform you of the reasons and the expected response date.

10.2 RIGHT TO LODGE A COMPLAINT WITH THE CNPD

You have the right, without prejudice to any other administrative or juridical remedy, to lodge a complaint with:

- Commission Nationale pour la Protection des Données (CNPD)
- 15, Boulevard du Jazz, L-4370 Belvaux, Luxembourg
- Website: www.cnpd.lu

You also have the right to lodge a complaint to any other data protection competent supervisory authority in the EU Member State of your habitual residence, place of work, or place of the alleged infringement.