



GENERAL DATA PROTECTION REGULATION PRIVACY NOTICE

Effective as of: 25/05/2018

GENERALITIES

At MC Square, we care about your privacy and value the trust you place in us when you share your personal information.

Accordingly, we wanted to let you know how we deal with the personal information you give us or is given to us by a third party. The aim of this Notice is to explain to you - as Data Subject - what kind of personal information we gather on you, why and how we process it as data controller. This Notice (i) describes MC Square's obligations as Data Controller and the rights of each Data Subject regarding the processing of their Personal Data, and (ii) provides the legally requisite information in this regard.

MC SQUARE processes Personal Data in accordance with the amended Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("**General Data Protection Regulation**")

This notice might be subject to changes. Any updates will be posted on our website. We recommend you regularly review it to ensure that you are always aware of our privacy practices. Our privacy commitments to you:

- We will keep your data safe and private
- We will ensure that you can exercise your rights
- We will train our employees to properly manage your personal information

WHO IS CONCERNED?

This Notice describes our practices when using:

- The personal information of natural persons which are clients based in the EEA¹ or outside the EEA;
- The personal information of any other data subject which operates as an employee, a legal representative, a supplier, a partner, a proxy, an administrator, a guarantor or a contact person.
- The personal information of natural person based in the EEA who may visit our Website.

WHAT PERSONAL INFORMATION ARE WE COLLECTING AND WHY?

- The following categories of Personal Data, depending on the services for which the Data Subjects are registered, will be collected and used by MC SQUARE in the performance of its business operations: personal identification data (e.g. name, address, phone numbers);
- personal details (e.g. gender, date of birth);
- official identification data (e.g. ID card number);
- electronic identification data (e.g. email address, IP address, electronic signature);
- biometric identifiers (e.g. dynamic signature);
- bank and financial identification data (e.g. bank account numbers and credit card numbers);
- financial transactions;
- data relating to the Data Subject's financial situation (e.g. income, wealth, assets, loans, expenses);
- insurance related data (e.g. insurance company, type of insurance, amounts insured); and data relating to the person in question's business affairs (e.g. identity of legal representatives and other business contacts);

The General Data Protection Regulation requires that we undertake to process only the data necessary for the purpose pursued by the processing.

¹ European Economic Area

More specifically, we use your personal data for the following purposes:

- to the extent that such processing is necessary for the performance of the contracts between MC SQUARE and the Data Subject or in order to take steps at the request of the Data Subject prior to entering into a contract. In particular, the Personal Data will be processed for the implementation, administration and management of the contractual relationship and for the purpose of updating Data Subject information;
- to the extent that such processing is necessary to comply with a legal obligation to which MC SQUARE is deemed for regarding clients and prospects, including in particular regulations relating to (i) the management of complaints from Data Subjects, (ii) reporting obligations vis-à-vis therelevant Luxembourg and foreign authorities, (iii) good risk management by MC SQUARE, (iv) measures to combat money laundering and financing of terrorism (v) and KYC obligations;
- to the extent that this processing is necessary to comply with a legal obligation to which MC SQUARE is deemed for, including issuing invoices for services provided to Data Subjects;
- to the extent that this processing is necessary in MC SQUARE's legitimate interest in managing the relationship with prospects or constantly updating its services in line with the needs of its Data Subject, in particular in connection with offerings intended to supplement the services for which the Data Subject is already registered and, accordingly, in order to develop commercial, canvassing and marketing strategies relating to services promoted by MC SQUARE.

THIRD-PARTY PERSONAL DATA

Data Subject who provides BMI with third-party Personal Data (in particular those of family members and representatives of his or her employer) must obtain permission from said third parties and inform them that BMI processes Personal Data for the same purposes and in the same way as described in this letter on the processing of Personal Data.

WHAT ARE YOUR RIGHTS?

Individuals have the following rights, under certain circumstances, in relation to their personal information:

- Right to access personal information
- Right to rectify personal information
- Right to restrict the use of personal information
- Right to request that personal information is erased
- Right to object to processing of personal information
- Right to data portability (in certain specific circumstances)
- Right to withdraw for consent for data processing (if the consent was required for lawful processing)
- Right to lodge a complaint with a supervisory authority.

If you - as an individual - wish to exercise these rights, you can contact MC Square at the following address:

MC Square

23 Val Fleuri

L-1526 Luxembourg

Tel: (+352) 26 92 70 34 61

Email: info@mcsquare.lu

We may ask for additional information to verify your identity before carrying out a request.

DATA TRANSFER

MC Square may transmit personal data to its service providers, suppliers and intermediaries in connection with the management of contracts.

Your data can be transmitted to public authorities, regulatory authorities, courts when required by law.

We only transmit your data for commercial use with your prior consent.

RETENTION PERIODS

We will retain your personal information covered by this Notice for as long as required to perform the purposes for which the data was collected, depending on the legal basis on which that data was obtained and/or whether additional legal/regulatory obligations mandate that we retain the personal information. In general terms, this will mean that personal information will be kept for the duration of our relationship and:

- the period required by tax, company and financial services laws and regulations, especially AML/CFT regulations; and
- as long as it is necessary for individuals to be able to bring a claim against us and for us to be able to defend ourselves against any legal claims. This will generally be the length of the relationship plus the length of any applicable statutory limitation period under applicable law.

CONFIDENTIALITY AND SECURITY

We have implemented reasonable technical and organisational measures designed to secure personal information from accidental loss and unauthorised access, use, alteration or disclosure.

HOW TO CONTACT US?

If you would like to raise any questions, concerns or complaints concerning this Notice, you can contact us at:

MC Square

23 Val Fleuri

L-1526 Luxembourg

Tel: (+352) 26 92 70 34 61

Email: info@mcsquare.lu

You can also lodge a complaint with the supervisory authority: the Commission nationale pour la protection des données (CNPD), Service des réclamations, 15, Boulevard du Jazz, L-4370 Belvaux, Luxembourg.