



Yours

EXCLUSIVELY INCLUSIVE

PRIVACY POLICY – PROVISION OF SERVICES

INTRODUCTION

At Yours Business & Family Advisory (hereinafter ‘Yours’, ‘we’ or ‘us’), our policy on the protection of privacy and personal data is essential. The purpose of this privacy policy is to inform you about the type of data we collect, why we collect it, how we use it and how we share it. It also explains your rights in relation to your personal data, how to contact us and how to lodge a complaint.

If, as a customer, you provide us with the personal data of a third party (company director, member of your family, lawyer, notary or any other contact), please inform them of this policy before providing us with their personal data.

If, as a customer, you provide us with the personal data of a third party (company director, member of your family, lawyer, notary or any other contact), please inform them of this policy before sending us their personal data.

WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA?

Yours Business & Family Advisory (‘Yours’, ‘we’) is responsible for processing your personal data. Yours is a Public limited company (‘société anonyme’) incorporated under Luxembourg law with its registered office at L-1311 Luxembourg, 27B Boulevard Marcel Cahen, registered with the Luxembourg Trade and Companies Register under number B 211.841.

If you have any questions about this policy or about exercising your rights regarding your personal data, you can contact us by post at the above address or by e-mail at the following address: info@yoursadvisory.com

FOR WHAT PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

Yours processes the personal data of its customers, employees or other independent collaborators of its customers or other contacts of its customers whose personal data has been communicated to Yours by its customers:

- for the purposes of providing the service for which you have engaged us; to exchange information with you and to answer your questions (by post, e-mail, telephone, etc.) in connection with the provision of the services (for example: to request, receive or discuss your instructions, to keep you informed of the status of your file, to take the necessary steps vis-à-vis third parties, etc.);
- to comply with our legal obligations, in particular with regard to the fight against money laundering;
- to keep you informed of the latest legal news relevant to your business via our email newsletters, to keep our database up to date, to use the information you have given us to get to know you better, to understand you better and to improve our services and mailings;
- for billing, administration and other purposes.

WHAT ARE THE LEGAL GROUNDS FOR THE PROCESSING OF YOUR PERSONAL DATA BY US?

If you are our customer, the processing of your personal data by us is necessary for the performance of the contract concluded between you and Yours, relating to the provision by Yours of services for which you are the beneficiary.

Yours also processes your personal data in compliance with its legal obligations, in particular with regard to the fight against money laundering.

If you are an employee or independent collaborator of our customer and our customer has designated you as a contact person, we process your personal data based on our legitimate interest and the legitimate interest of our customer to enter into a relationship with you in the context of the provision of our services.

If you are a contact of our client and the client has provided us with your personal data in your capacity as an expert, supplier, accountant or because you work in some other way with our client, we will also process your data on the basis of our legitimate interest and the legitimate interest of our client to manage our client's file in the best possible way.

We consider that our legitimate interest and our customer's legitimate interest in processing such personal data do not override your interests or fundamental rights and freedoms. If you do not agree with our view and do not wish your personal data to be processed for the purposes described above, you may contact us by e-mail at info@yoursadvisory.com to exercise your right to object to the processing of your data (see Section 'What are your rights?' below).

Insofar as we have received your personal data in the course of providing our services, we also consider that it is in Yours' legitimate interest to process your personal data for the purposes of sending you our news emails. Their purpose is to keep you informed of legal and tax news. You

may exercise your right to object to the processing of your data for this purpose at any time and free of charge by sending us an e-mail stating your wish to be removed from our mailing list. Upon receipt, we will remove you from the list.

WHAT TYPES OF PERSONAL DATA DO WE COLLECT?

We process the following personal data:

1. surname, first name, title, function, company, business address, legal form, e-mail address, telephone/GSM number and fax number,
2. nationality, identity card, national number, VAT number, bank account number, company number,
3. preferred language, areas of interest, memberships, sector of activity, etc,
4. information collected in the context of files: information collected in the context of files may include the personal data of other individuals. We do not process this information in a different database.

The collect of your personal data may constitute a legal requirement and/or an indispensable condition for the conclusion of a contract with Yours, in particular to fulfil our legal obligations with regard to money laundering and the financing of terrorism. Failure to provide your personal data may result in the failure to enter into a contract with Yours or the inability of Yours to provide its services.

WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

As a general rule, we do not share your personal data with third parties. In certain specific cases, we may need to share your personal data:

1. when required by law or court order;
2. in the course of providing our services, with experts, lawyers, notaries, possibly official authorities, etc., in Luxembourg or abroad, in accordance with the customer's instructions. As a reminder, the involvement of experts, notaries, lawyers, etc. is agreed in advance with the customer;
3. as a matter of internal organization, with other Yours partners, service providers and employees with whom we work jointly to carry out the assignment you have entrusted to us.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

1. Processing of personal data in the context of the assignment you have entrusted to us

We process your personal data for as long as necessary to carry out the task you have entrusted to Yours.

When our contractual commitment comes to an end, we retain this personal data for as long as necessary for the purposes of accounting, tax or other legal requirements.

2. Processing of personal data for canvassing purposes

We will continue to process your personal data to keep you informed of the latest legal news relevant to your business via our news emails for as long as you do not object to the processing of your personal data for these purposes. If you do, we will immediately remove you from our mailing list.

This will in no way affect the processing of your personal data by Yours for the purposes of providing our services.

WHAT ARE YOUR RIGHTS?

You have several privacy rights, including the following:

- Right of access: you have the right to know what types of personal data we hold, the purposes of the processing and to obtain a copy of your data.
- Right of rectification: you have the right to obtain rectification of inaccurate personal data concerning you.
- Right to erasure: in certain circumstances, you have the right to request that we erase your personal data.
- Right to restrict processing: you have the right to require us to stop using your personal data in certain circumstances, for example if you believe that the data we hold is inaccurate or if you believe that our use of your data is unlawful. If you validly exercise this right, we will retain your personal data but will stop processing it until the matter is resolved.
- Right to object: where we process your personal data on the basis of our legitimate interest, you have the right to object to the processing of your data.
- Right to data portability: you have the right to demand to receive the data concerning you that you have communicated to us in a structured, commonly used and machine-readable format and have the right to obtain that personal data be transmitted directly from one data controller to another, where this is technically possible.

To exercise your privacy rights, you can contact us via the following e-mail address: info@yoursadvisory.com

Yours will process your request within a maximum of one month. If, for legitimate reasons, your request is not granted, Yours will contact the person concerned and give reasons for its decision.

QUESTIONS AND COMPLAINTS

If you have any questions, comments or complaints relating to this policy or to the way in which Yours processes your personal data, please do not hesitate to send an e-mail to info@yoursadvisory.com.

You can lodge your complaint about the way in which Yours processes your personal data with the Luxembourg Data Protection Authority (www.cnpd.public.lu).

AMENDMENTS

Yours reserves the right to amend this policy to comply with applicable privacy legislation. We may revise this policy at any time. You can consult the updated version of this policy on our website at any time.