

Legal framework

The Regulation (EU) 2016/679 of the European Parliament and 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to the processing of personal data and on the free movement of such data (through which the Directive 95/46/EC is repealed) (“GDPR”) and the related Luxembourg laws, notably the Act of 1st August 2018 on the organization of the National Data Protection Commission and the general data protection framework and the Act of 1st August 2018 on the protection of individuals with regard to the processing of personal data in criminal and national security matters.

Data Protection

Antwort Capital S.A, acting as a data controller, in accordance with current legislation on GDPR, informs the users of our website its commitment to safeguarding your personal information that may only be obtained for processing when the data is adequate, relevant, and not excessive in relation to the specific, explicit, and legitimate scope and purposes for which they were obtained. The personal data provided will be processed by Antwort Capital S.A., and will be used in accordance with the information set out in this notice and in Antwort Capital S.A.’s data protection policy.

Processing personal data

Processing personal data can be any operation or set of operations on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction. The life cycle of a processing activity is the following:

- Collection
- Use
- Conservation
- Deletion

Responsible for the processing of personal data

- Company name: Antwort Capital S.A.
- RCS: B228439
- Address: 13 rue Aldringen L-1118 Luxembourg, Grand Duchy of Luxembourg
- Contact Data Protection Officer: dpo@antwort.lu

Which personal data do we collect and what do we use them for?

- Data collected directly: by voluntarily filling in any forms on our website or received via the contact addresses set out on the Contact page or Join Us page.
- Data collected indirectly through the use of cookies.

Our website will use the data for the following purposes:

- To assist you in relation to any pre-contractual request that a user sends through the channels set up for this purpose on the Contact Us page, including sending you information about our funds, services or if you have subscribed for receiving our newsletter.
- To enable us to answer any self-application that a user sends through the channel setup for this purpose on the Join Us page, including sending you confirmation of receipt and store your profile and CV for the future opportunities that match with your experience and skills.
- To guarantee the performance of our website and maintain its correct functioning, security and accessibility.

To whom might we disclose your persona data?

To achieve the purposes listed in the previous section, the data is only transferred to the internal employees in Antwort Capital S.A who require it for their roles and responsibilities within the company.

Antwort Capital’s employees are required to follow procedures with respect to maintaining the confidentiality of our investors’ non-public personal information. Additionally, we maintain physical, electronic, and procedural safeguards to protect the information. This includes performing ongoing evaluations of our systems containing investor information and making changes when appropriate.

International transfers

Antwort Capital does not foresee any international transfers of your personal data provided through our website.

How long is your data stored for?

Your data is only kept as long as we estimate for it be necessary to achieve the initial goal.

All personal data is stored for a defined period of time depending on the type of data. The retention period may differ depending on the purpose of the data collected such as:

- legal and contractual retention periods
- the limitation period during which the concerned persons may assert their legal rights against our company
- good practice
- company's commercial goals

The maximum retention period of your personal data does not exceed 10 years.

Rights of data subjects

In accordance with the applicable regulations, the user may exercise its rights of access and receive his/her own data, rectification, deletion, portability, restrict processing, or withdraw your consent by writing to the address indicated in the "Responsible for the processing of personal data". However, in the event that such a request is not granted, you have the right to lodge a complaint with the relevant Data Protection Supervisory Authority.

Data subjects have the right to complain to the Supervisory Authority: *Commission nationale pour la protection des données* (<https://cnpd.public.lu/fr.html>).

Changes to this data protection notice

Antwort Capital S.A. reserves the right to keep this data protection notice under regular review, and we may change, modify, add, or remove portions from the notice at any time. We will post any modifications or changes to this data protection notice on our website prior to such changes taking effect.

Cookies

Our website uses cookies to support the technical performance and/or security of the website, to monitor how it is used and as part of links to third party platforms.