

## **SINTRO Asset Management GmbH**

### **Privacy Notice for Residents of the European Economic Area (EEA) and United Kingdom (UK)**

#### **How we collect information about you**

We may collect personal data about you through:

- information provided directly to us by you, or another person on your behalf through this website or by email, post or in person; or
- information that we obtain in relation to any transactions between you and us.

If you are a candidate for employment, we may receive information from you directly (through this website) or from a recruitment agency acting on your behalf. We may also, in some circumstances, receive personal information about you from third parties, such as service providers or trading counterparties, regulatory or law enforcement agencies, credit reference agencies and agencies conducting background checks. Personal information about you may also be obtained from publicly accessible sources of information, such as public databases, industry associations, social media and online professional networks.

#### **Why we collect information about you**

We may collect and use your personal information for the purposes of recruitment, administering the relationship between us, monitoring and analysing our activities and complying with applicable legal or regulatory requirements. We will use one of the permitted grounds under the applicable law to process your information. Such grounds include instances where you have given your consent and cases where your consent is not required under applicable law, such as where we are required to comply with a legal obligation, or where we or a third party determine that it is necessary for our legitimate interests to collect and use your personal information. The legitimate interests to collect your personal information may include any of the purposes identified above and any other purpose where we or a third party have determined that you have a reasonable expectation for us or a third party to collect or use your personal information for such purpose. You have the right to object to the use of your personal data for direct marketing purposes.

#### **Do we share your personal information with third parties?**

We may (to the extent relevant to the purpose for which we collect your information), share your personal data with third parties, such as:

- our affiliates or other entities that are part of our group or with our clients;
- any person to whom we have a right or obligation to disclose personal data, or where we determine that disclosure is necessary to protect or defend our rights or property, including with regulators, courts of law, governmental, regulatory or law enforcement agencies;

- our internet, IT, telecommunications and other service providers, including legal advisers, accountants, payroll administrators, insurance and employee benefits providers and administrators;
- service providers and trading counterparties to our clients, including placement agents or distributors, brokers, banks, trading venues, clearing houses, custodians, corporate services providers, administrators of our funds and providers of customer relationship management tools;
- credit reference agencies and other third parties conducting background checks in the context of employment or client, counterparty or investment due diligence; • any person, as directed by you; or
- any person to whom we transfer any of our rights or obligations under any agreement, or in connection with a sale, merger or consolidation of our business or other transfer of our assets, 2 whether voluntarily or by operation of law, or who is otherwise deemed to be our successor or transferee.

### **Transfers of personal information to countries outside the EEA and UK**

Due to the international nature of our business, your personal data may be transferred to countries outside of the EEA/UK, such as to jurisdictions where we or our clients conduct business or have a service provider, including countries, such as Switzerland or the United States, that may not have the same level of data protection as that afforded by the EU General Data Protection Regulation, UK General Data Protection Regulation or other data protection legislation applicable to us (collectively, “Data Protection Law”). In these circumstances, we take steps to ensure that the recipient agrees to keep your information confidential and that it is held securely in accordance with the requirements of Data Protection Law, such as by entering into legal agreements with service providers and between our group entities containing contractual requirements to comply with the Data Protection Law.

### **For how long do we keep your personal information?**

We will generally keep personal information about you for as long as necessary in relation to the purpose for which it was collected, or for such longer period, if required under applicable law or necessary for the purposes of our other legitimate interests. The applicable retention period will depend on various factors, such as any legal obligation to which we or our service providers are subject as well as on whether you decide to exercise your right to request the deletion of your information from our systems. As a minimum, information about you will be retained for the entire duration of any business relationship we may have with you. We will, from time to time, review the purpose for which we have collected information about you and decide whether to retain it, update it, or securely delete it, if the information is no longer required.

### **What are your rights?**

You have certain rights under the Data Protection Law in respect of the personal data we hold about you and which you may exercise. These rights are:

- to request access to your information;
  - to request rectification of inaccurate or incomplete information;
  - to request erasure of your information (the “right to be forgotten”);
  - to restrict the processing of your information in certain circumstances;
  - to object to our use of your information, such as where we have considered such use to be necessary for our legitimate interests (e.g., in the case of direct marketing activities);
  - where relevant, to request the portability of your information;
  - where you have given consent to the processing of your data, to withdraw your consent;
- and

If you have any questions about these Privacy Notices, please contact us at [contact@sintro.eu](mailto:contact@sintro.eu).

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