STATEMENT ON PERSONAL DATA PROCESSING PURSUANT TO THE REGULATION (EU) 2016/679 (THE "GDPR")

Access to the website www.neam.lu (the "**Website**") is free; entry of personal data ("**Personal Data**") as well as any decision concerning the use of the services provided through the Website are deferred to users (hereinafter the "**Users**" and, individually, "**User**").

NEAM SA, 19, Rue Du Puits Romain, L - 8070 Luxembourg ("**NEAM**") [legal@neam.lu - +352 20807600], in its capacity of management company of the umbrella fund NEF (hereinafter "**NEF**" or the "**Fund**") is the Data Controller; for any information concerning the processing of Personal Data, please use the following contact details [legal@neam.lu - +352 20807600]

1. What kind of Personal Data are collected by NEAM and for what purposes

NEAM will collect just the Personal Data given by users on a voluntary basis by e-mail, through the e-mail address provided on the Website (*i.e. curricula*);

NEAM could not therefore know in advance what kind of Personal Data may be processed.

The Personal Data processing, directly performed by NEAM, is strictly aimed at satisfying requests received from Users and, in particular, to:

- analyze requests received through the e-mail address "legal@neam.lu";
- develop new products/services, enhance, improve or modify the Website.

Failure to consent the processing by Users does not allow NEAM to examine the request received.

Personal Data are processed through electronic tools in compliance with the applicable laws and regulations concerning the protection of Personal Data; to this end, appropriate security measures are implemented in order to limit the risk of Personal Data destruction or loss, unauthorized access or processing that is not permitted or does not comply with the purposes of data collection.

Finally, some Personal Data concerning Users' navigation on the Website might be collected by software applications in use, which may contain the so called "cookies" technology. For more information about cookies, please read the section "Cookie" on our website.

2. Legal basis for the Personal Data processing and methods of processing

The legal basis for the Personal Data processing is represented by User's consent to the relevant activities, which is intended to be given by sending the Personal Data. The consent can be withdrawn at any time pursuant to the provision set out in art. 6.

Personal Data may be subject to one or more operations, carried out also through the use of IT and data collection, registration, organization, conservation, consultation, processing, selection, extraction, comparison, use, interconnection, communication, dissemination procedures, cancellation and destruction in compliance with the applicable laws and regulations.

The abovementioned Personal Data processing is carried out using appropriate tools to ensure the security and confidentiality of Personal Data and it may also be carried out through automated tools to store, manage and/or transmit the data.

3. **Entities to which the Personal Data may be disclosed**

NEAM may disclose Users' Personal Data to its employees and consultants in charge of the relevant processing; Personal Data shall not be communicated to third parties.

Nonetheless third parties might have access to the Personal Data within the scope of technical operations related to the maintenance of the Website and its servers, as well as within the scope of inspections, auditing/control activities carried out on NEAM by the competent authorities and/or by its supervisory bodies.

These subjects are required, to the extent they have received or accessed to Personal Data, to ensure that appropriate security measures are taken in order to guarantee that such Data would not be disclosed or breached and they are also required to use the utmost confidentiality in relation to Personal Data.

In certain specific circumstances, Personal Data may be disclosed to third parties, to the extent it is permitted by the applicable laws and regulations, or to comply with such rules, for example in case of appearance in court or in legal proceedings, to fight against fraud or in order to cooperate with the competent authorities.

NEAM might be required to disclose Users' Personal Data to the competent authorities (such as public security authorities, courts, or regulatory authorities) where such disclosure is envisaged to comply a legal duty or, in any case, where it is compulsory or imposed by such authorities.

NEAM is not intended to make Personal Data available to third party for further commercial and/or advertising purposes and/or for carrying out market research or similar processing.

4. **Duration of the purposed processing**

NEAM shall retain Users' Personal Data as long as it is necessary for the legitimate purpose of processing described in this document, unless a longer storage period is required or permitted by law.

5. **Storage and safeguard of the Personal Data**

NEAM has taken technical and organizational measures necessary to ensure, for the processing concerned, that Personal Data provided by User's are safe and protect against the risk of loss, misuse and unauthorized access, disclosure, alteration and/or destruction.

In particular, in order to prevent unauthorized disclosure or access, NEAM has implemented appropriate physical, electronic and management measures to protect and ensure Personal Data and their security.

Unfortunately, no system of data transmission or storage can guarantee absolute security, therefore, should the User have reason to believe that a breach of any account he holds to access to the Website has occurred, he must promptly notify such event to NEAM, emailing to legal@neam.lu.

6. Users' rights

Users who have provided their Personal Data may at any time exercise their rights by sending their request to legal@neam.lu. Every request must be replied by NEAM within one month from the date of receipt; this term may be extended, subject to the relevant notification of such extension to the party concerned, up to 3 (three) months, if the request regards particularly complex profiles.

Users may, at any time, notify to NEAM, in its capacity of Data Controller:

- the withdrawal of their consent to the Personal Data processing;
- a request in order to have access to their Personal Data and to receive the relevant indication in an intelligible form and, therefore, to obtain:
  a) confirmation about the existence or not of their Personal Data among those involved in the processing;
  b) further clarifications concerning the purposes of the processing and to what extent Personal Data are or will be processed;
  c) meaningful information about the logic involved in automated decision-making;
  d) the identity and the contact details of the Data Controller, Data Processors and any other entity and/or natural person involved in the processing, as well as the indication of the recipients or categories of recipients to whom the Personal Data may be communicated or who may become aware of it;
- a request for rectification or integration of inaccurate Personal Data;
- the restriction of Personal Data processing in order to obtain the erasure of Personal Data concerning him or her, without undue delay.

7. Right to submit complaints

Pursuant to article 77 of the GDPR, Users may lodge a complaint with the supervisory Authority in the Member State of their habitual residence, where he/she considers that the processing of Personal Data relating to him or her infringes the applicable laws and regulation concerning data protection.