

## **Data Protection Policy of Altamar Global Investments S.A., A.V. for the Personal Data of its Investors**

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### ***Who is the data controller for the personal data?***

For processing of the personal data obtained through this relationship, the data controller is Altamar Global Investments, Sociedad Anónima A.V. (the 'Broker-dealer' or 'AltamarCAM').

- Address: Paseo de la Castellana, 91, 28046, Madrid, Spain
- Telephone: +34 91 290 07 00
- Email: [altamarcam@altamarcam.com](mailto:altamarcam@altamarcam.com)

Grupo AltamarCAM has appointed a Data Protection Officer, who is responsible for monitoring compliance on the subject of data protection, and who can be contacted at: [dpo@altamarcam.com](mailto:dpo@altamarcam.com)

### ***What type of personal data does AltamarCAM process and how is it obtained?***

AltamarCAM may engage in processing of the identification data for: (i) legal representative(s); (ii) real owners; (iii) administrators, and (iv) employees of their clients, if applicable. In addition, AltamarCAM may engage in processing of socio-economic data; data on reputation, solvency, risk, and fraud; and data on compliance or non-compliance with financial obligations. Here, all this data will be referred to jointly as the 'Personal Data'.

AltamarCAM obtains the Personal Data using the following means, as applicable: (i) from interviews with the Broker-dealer or from telephone conversations, whether in relation to queries, requests, or contracting of any product, or in relation to any transaction or operation; (ii) from third-party databases maintained for purposes of combatting money laundering and fraud; (iii) from various open-access media; (iv) from the records of public entities; and finally (v) from databases on compliance or non-compliance with financial obligations. All this personal data may be stored in the Broker-dealer's computerised file systems.

The Investor must provide, when necessary, all the data requested by the Broker-dealer in order for the pertinent requests to be processed.

### ***What is the purpose and legal basis for AltamarCAM's processing of their personal data?***

- Referral of information prior to hiring. The Broker-dealer will process personal data of its clients to keep them informed, through the appropriate means (electronic or not) of the evolution of the funds that it commercializes or can get to commercialize. The Broker-dealer will send this type of communications as a result of your request. In any case, in the event that customers cease to be interested in receiving such information, they can contact through the address [dpo@altamarcam.com](mailto:dpo@altamarcam.com) or they can unsubscribe in each communication that is sent.
- Necessary treatments for the commercialization of the funds or required advice. Either the transmission of the order or advice required based on the contractual relationship with the Broker-dealer such as the processing of the relevant applications, as well as the communication of data to the relevant Management Company. Likewise, in the event that the contracting is formalized, the Broker-dealer will continue to inform you, through the appropriate means (electronic or not) of the evolution of the invested funds, as well as others that the Broker-dealer commercializes or can get to commercialize.
- On the other hand, the Broker-dealer may transfer, the necessary Personal Data, to third-party depository entities, administrators or that maintain a contractual relationship with the commercialized funds. In this case, the Broker-dealer may require certain information due to legal or fiscal obligations, such as the obligations of prevention of money laundering and terrorist financing. The Broker-dealer can carry out formal and real, professional or business identification or product applicants of the Broker-dealer. The Broker-dealer may require the documents it deems necessary for the accreditation of the declared activity.
- Compliance with accounting, legal, tax-related, and administrative obligations.
- Management of queries, suggestions, claims, and complaints.
- The Broker-dealer may view and process their data related to financial solvency and credit history as obtained from entities that provide services on information about financial solvency and credit, and it may also disclose data about their situation to these entities when applicable.
- Obtaining and updating personal data, either through internal databases of the AltamarCAM Group or from external sources available.
- To prevent any fraudulent conduct, the Broker-dealer may disclose the Investor's Personal Data to centralised information systems, and also to entities based within the European Economic Area ('EEA') in which AltamarCAM

Capital Partners S.L. directly or indirectly holds an ownership interest, with further details on those entities available at the following link: <https://www.altamarcam.com/altamarcam-entities/>

- Compliance with a legal obligation:
  - Under circumstances related to services for order reception and transmission and investment advice, the Broker-dealer will collect information related to the Investor's financial situation, including the capacity for loss.
  - Disclosure of the Investor's Personal Data to government offices and regulatory bodies located within or outside of the EEA, when the transfer is mandatory under current legislation, for important reasons of public interest.
- Legitimate Interest:
  - The Broker-dealer may send the Investor information about its funds or other products, whether by ordinary means or electronically, and unless the Investor has expressed its opposition to this processing.
  - For administrative purposes and for coordination of activities related to its company objects involving advising and management for alternative assets, disclosure of the Investor's Personal Data to the entities based within the EEA in which Altamar CAM Partners S.L. directly or indirectly holds an ownership interest, with further details on those entities available at the following link: <https://www.altamarcam.com/altamarcam-entities/>

Those types of processing will take place based upon the Broker-dealer's legitimate interest, and in no case will this cause any restriction of the Investor's data protection rights, since the data processed will be solely and exclusively that required for the purposes indicated. In all cases, the Investor will always be able to express opposition to this processing using the means described under the heading: *How can I exercise my rights on the subject of data protection?*

#### ***Do we process data on third parties?***

The Broker-dealer may process the personal data of third parties such as: the Investor's legal representative(s) and persons with significant control, persons having indirect control over the Company, members of the management team, family members, and minors. The Investor is declaring that the Personal Data and information it has provided in relation to third parties is accurate and reflects their actual situation; that those third parties have been informed about disclosure of their data; and that their consent has been obtained for disclosure of their personal information during the appropriate process. In cases where the data processed is related to a minor, the Broker-dealer will only process that information related to a minor with proper authorisation from the legal representative (mother/father/guardian).

#### ***Do we transfer your data to third-party entities, or can they gain access to it?***

The Broker-dealer will only disclose your Personal Data to:

- The depositary entities, managers, or other parties that have a contractual relationship with the funds represented.
- Regulatory bodies and public institutions from Spain's national, regional, and local governments, or to other authorities that may be located within or outside of the European Economic Area when provision of data to them is required by law.
- Courts or tribunals.
- Collective databases on financial solvency or credit risk: these may be collective databases that record failures to comply with financial obligations or the Bank of Spain's Risk Information Centre.
- To prevent fraudulent conduct, Personal Data may be sent to the various companies belonging to Grupo AltamarCAM, or to centralised information systems.

Also, the Broker-dealer has third-party service providers that can access personal data for purposes of providing their services, such as auditors, outside experts, lawyers, consultation services, advisers, IT maintenance firms, potential buyers or investors, administrative services, and document destruction services, among others. The Broker-dealer pre-screens these providers in accordance with criteria related to data protection compliance. It has signed agreements with all of them on that subject, and it monitors their compliance with their obligations on that subject.

#### ***How long will we store their personal data?***

Any personal data to which Access is given will be processed for as long as the relationship exists with the Broker-dealer. The Broker-dealer will store the personal data after the relationship has ended, but with access appropriately blocked, until the limitation periods have expired for any legal actions that could be derived from the relationship maintained with the data subject.

#### ***How can I exercise my rights on the subject of data protection?***

In relation to the data provided at any time, the Investor can exercise the rights to access, rectification, and erasure for that personal data, and the right to oppose or restrict processing of that data, and the right to oppose being subject to automated individual decision-making, by sending a written request to the Broker-dealer's Data Protection Officer / Control Department at Paseo de la Castellana, 91, 28046, Madrid, Spain, attaching a copy of the Investor's national

identification document or other official identity document. This can also be done by email, using the address: [dpo@altamarcam.com](mailto:dpo@altamarcam.com).

***Where can claims on the subject of data protection be submitted?***

If any of the Investor's data protection rights appear to have been violated, or for any other claim related to personal information, the Investor can write to Grupo AltamarCAM's Data Protection Officer to request resolution of that claim at: [dpo@altamarcam.com](mailto:dpo@altamarcam.com). In all cases, the data subjects can submit a claim to the Spanish Data Protection Agency (AEPD), which is Spain's supervisory authority on the subject of data protection: <http://www.agpd.es>. C/Jorge Juan número 6, 28001, Madrid, Spain. Tel: 901 100 099 / 91 266 35 17.