

Privacy Notice

As an European regulated AIFM under the AIFMD Regulations, Praesidium (the Company) is committed to maintaining the highest standards of data governance, transparency, and security. This Privacy Notice explains how we collect, use, share, retain, and safeguard personal data in the course of our activities—whether you are an investor, a prospective investor, a service provider, or visitor to our website.

In this notice, “Praesidium,” “we,” “our,” or “us” refers to Praesidium S.A., a Luxembourg société anonyme authorized as an Alternative Investment Fund Manager (AIFM), and its Italian branch. Both operate under the same brand and governance framework, but are considered separate establishments for certain legal and regulatory purposes. References to “Praesidium” in this Privacy Notice should be understood as covering the Luxembourg headquarters and the Italian branch, unless expressly stated otherwise.

We believe in treating your personal information with care, limiting access to only what is strictly necessary, and ensuring that your rights under applicable data protection laws are respected. This notice also explains your rights as a data subject (e.g. access, correction, deletion, objection) and how you can exercise them.

We encourage you to read this Privacy Notice carefully. If you have any questions, or if you wish to exercise any of your data protection rights, please contact us using the details below.

Principle of data processing & legal bases

We process personal data primarily to fulfil our obligations as an Alternative Investment Fund Manager (AIFM) and to manage our relationships with investors, prospective investors, and business partners. This includes carrying out investor onboarding, due diligence and “Know Your Customer” (KYC) checks, complying with Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) obligations, managing subscriptions and redemptions, maintaining investor registers, handling communications, and meeting regulatory and reporting duties under applicable EU and Luxembourg laws. Where necessary, we may also process personal data to protect our legitimate interests, for example to maintain the security of our systems, to prevent fraud, or to ensure the efficient management and administration of our investment structures.

To support these activities, we may engage carefully selected third-party service providers, such as administrators or compliance specialists, who perform certain processing activities on our behalf. In all cases, processing is carried out on a lawful basis as defined by the



[General Data Protection Regulation \(GDPR\)](#), including legal obligations, contractual necessity, or our legitimate interests. Where we rely on consent for specific activities, we will request it clearly and allow you to withdraw it at any time.

Principles on use of personal data

In this Privacy Notice, “personal data” refers to any information relating to an identified or identifiable natural person. This may include basic identification and contact details (such as name, address, date of birth, email, telephone number), official identification documents (passport, ID card, tax identification number), financial information (such as bank account details and investment history), and information required for regulatory and compliance purposes (such as KYC and AML checks, beneficial ownership details, and source of funds/wealth information).

In limited circumstances, we may be required by law to process information that could incidentally include sensitive data. For example, official identification documents used for KYC/AML purposes (such as passports or national ID cards) may contain a photograph or other details that could indirectly reveal information such as ethnic origin or health status. Similarly, personal data relating to criminal convictions or offences may be processed where necessary to comply with AML/CFT regulations. We do not actively seek to collect or use such special categories of data, and any processing is carried out only where strictly required by applicable law and subject to appropriate safeguards.

Principles of data subject rights

As a data subject, you have the following rights in relation to your personal data, in accordance with the General Data Protection Regulation (GDPR) and applicable Luxembourg law:

- **Right of access** – you may request confirmation of whether we process your personal data and obtain a copy of that data together with relevant information
- **Right to rectification** – you may ask us to correct or update any personal data that is inaccurate or incomplete
- **Right to erasure** – in certain circumstances, you may request the deletion of your personal data, subject to legal and regulatory retention requirements.
- **Right to restriction of processing** – you may request that we limit the use of your personal data so it is processed only for specific purposes.



- **Right to object** – you may object to the processing of your personal data carried out on the basis of our legitimate interests, including the right to object at any time to its use for direct marketing.
- **Right to withdraw consent** – where processing is based on your consent, you may withdraw that consent at any time, without affecting the lawfulness of processing carried out before withdrawal.
- **Right to lodge a complaint** – you may raise concerns with the Commission Nationale pour la Protection des Données (CNPD) in Luxembourg, or with your local supervisory authority if you reside elsewhere in the EU.

Retention period criteria

Our company retain personal data only for as long as it is needed for the purposes described in the section “Principles on use of personal data.”

In order to meet our professional and legal requirements, to establish, exercise or defend our legal rights, and for archiving and historical purposes we need to retain information for significant periods of time.

Recipients and Transfer of data

In the course of our activities, we may share personal data with carefully selected third parties who provide us services such as fund administrators, depositaries, KYC/AML, and auditors. These entities act as data processors or, in some cases, as independent controllers, and are bound by contractual and legal obligations to protect the confidentiality and security of personal data.

We may also be required to disclose personal data to supervisory or regulatory authorities, including the Commission de Surveillance du Secteur Financier (CSSF) and the Luxembourg tax authorities, as well as to equivalent authorities in other jurisdictions where legally required. Where personal data is transferred outside the European Economic Area, we ensure that appropriate safeguards are in place, such as adequacy decisions or standard contractual clauses approved by the European Commission.

Contact Information

Praesidium S.A., a société anonyme incorporated and existing under the laws of Luxembourg with its registered office at 11, Rue Aldrigen acts as the data controller in relation to the processing of personal data described in this Privacy Notice. For activities carried out

through its Italian branch, Praesidium S.A. remains the data controller, with the branch considered part of the same legal entity.

In accordance with EU data protection law and CSSF requirements, Praesidium S.A has appointed a Data Protection Officer (DPO). The DPO's role includes monitoring compliance with applicable data protection obligations, providing advice on the interpretation and application of data protection laws, raising staff awareness and providing training, and carrying out audits where necessary. The DPO also acts as a contact point with the *Commission nationale pour la protection des données* (CNPD), the *Commissione Garante per la protezione dei dati personali*, and other supervisory authorities, and is available to answer questions from data subjects regarding the processing of their personal data and the exercise of their rights. If you have any questions about how we process your personal data, or if you wish to exercise your rights under applicable data protection laws, you may contact us at Compliance.Team@praesidium.eu.

Updates and changes

We will occasionally update this Notice to reflect changes in our practices and services. When we post changes to this notice, we will revise the "last updated" date at the top of this notice. If we make any material changes in the way we collect, use, and share personal data, we will notify you by prominently posting notice of the changes on the website. We recommend that you check this page from time to time to inform yourself of any changes in this privacy notice.