



Data Protection Policy

General Data Protection Regulation

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Introduction

The purpose of this Data protection Policy is to set out explicitly how Sycomore Asset Management (“the Company” or “Sycomore AM”) processes the personal data of its customers, prospective customers or natural persons otherwise linked to the Company such as an agent, shareholder, beneficial owner, contact person or representative of a legal entity (“the Data”).

Data protection is of paramount importance to Sycomore AM, and through this Policy, we seek to offer a transparent view of our practices in this area.

In accordance with the regulations in force, this Policy applies only to Data that directly or indirectly identifies a natural person.

Data is processed in compliance with applicable legal provisions and in particular Regulation (EU) No. 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (“GDPR”) and related French laws.

Sycomore AM reserves the right to amend this Policy to reflect more recent practices. The latest version will be available on the Company's website www.sycomore-am.com.

1. Who is the data controller

The Data Controller is Sycomore AM, a company with its registered office at 14 avenue Hoche, Paris 8th, and registered with the Paris Trade and Companies Register under number 438 230 104.

Sycomore AM is accountable to regulatory authorities for compliance with data regulations, determines the purposes for which the Data is processed, as well as the means implemented and all the characteristics of the processing, as explained in this Policy.

Some links on our website may redirect to websites not belonging to Sycomore AM, which have their own data protection policies that may differ from ours. You are responsible for reviewing them.

2. When are personal data collected?

Sycomore AM may particularly collect Data:

- When you become a client of the Company and throughout your relationship with us;
- When you express interest in our services and products by contacting us through the available channels or when you use them;
- When you provide us with a duly completed form;
- When you subscribe to our newsletters and other publications;
- When you respond to our invitations to events organized by the Company;
- During visits to our offices, when you are filmed for security purposes by our surveillance cameras, we may collect images, photos, or videos of you or record your voice;
- When you publish your Data on social networks or freely accessible websites;
- When your Data is published or transmitted by third parties or in the press;
- During conversations you have with us: phone calls, physical meetings, letters, emails, video conversations, and any other type of messaging.

3. For what purposes does Sycomore AM process the Data?

Sycomore AM collects and processes Data only if you have consented to it or if its use meets the purposes described below.

Sycomore AM solely determines these purposes for the needs of its activities and ensures that only the necessary and relevant Data for a specific purpose is processed.

Generally, Sycomore AM processes Data in situations permitted by law, namely:

- In compliance with legal and regulatory obligations to which the Company is subject;
- As part of pre-contractual measures;
- To enable the execution of a concluded contract;
- When we obtain consent on a specific request based on clear and unambiguous information;
- For reasons that fall within the legitimate interests of the Company.

3.1. Legal Obligation and regulatory compliance

Sycomore AM is required to comply with certain legal and regulatory obligations that necessitate specific processing of Data. This processing may involve the communication of Data to competent supervisory, judicial, or administrative authorities, whether national, international, European, or foreign, as well as to various entities related to Sycomore AM or third parties. We will ensure that this Data is transmitted only if the Company is bound by these obligations. For more information on the legal and regulatory obligations the Company must comply with, please use the contact methods specified in Article 9 of this Policy.

Below is a non-exhaustive list of legal and regulatory areas under which Sycomore AM is required to process Data. This list is subject to change. As such, the Company is required to:

Comply with:

- The rules in force regarding embargoes decided by competent French, foreign, or international authorities, whether these decisions concern individuals, organizations, or nationals of certain states. This can be done, for example, through the identification of the persons and assets concerned;
- The rules on financial, tax, fraud, or incident reporting defined by prudential supervisory authorities.

Contribute to:

- The fight and prevention of terrorism financing and money laundering, by determining profiles, identifying clients, their representatives and beneficial owners, and monitoring their operations and transactions;
- The fight against market abuse, by detecting and reporting insider trading, market manipulation, and suspicious transactions;
- The fight against tax fraud and evasion, in collaboration with competent authorities, by identifying clients, their accounts, and their contracts.

Communicate:

- To various prudential, tax, and judicial authorities based on official requests;
- To various competent authorities in the field of privacy protection based on official requests or when required by regulation.

Proceed with:

- The identification, for investor protection purposes, of appropriate or suitable financial products and services based on their profile, investor category, financial capabilities and assets, and investment objectives;
- The recording of certain telephone conversations and electronic communications.

3.2. Pre-contractual measures before you become a client of the Company

Before the conclusion of a contract, regardless of the means of communication used and provided by Sycomore AM, the Company must conduct an analysis to assess whether the proposed contract can indeed be concluded.

As part of this analysis, the Company will process the Data, in particular, to determine the conditions under which the contract could be concluded.

Sycomore AM reserves the right to refuse a contract if the requested information is not provided.

3.3. Contracts between Sycomore AM and its clients

In the context of executing contracts that bind Sycomore AM to its clients, as well as those that have been terminated, regardless of the communication channels used, the Company may, and in some cases must, obtain and process its clients' Data for the following reasons:

- Compliance with the Company's administrative and accounting obligations ;
- Execution of the mandate contract or other agreements concluded between the Company and its client;
- Advising on financial products and investments as well as managing the client's portfolio;
- Ensuring the provision of quality products and services to the client.

When Data necessary for processing requests or concluding a contract is missing, Sycomore AM's teams commit to notifying you as soon as possible. If the missing Data is not provided, Sycomore AM reserves the right not to proceed with your request.

In carrying out these various tasks and to provide optimal service, Sycomore AM must transmit or share Data among its different internal departments.

Sycomore AM may process Data in the context of executing contracts and more generally in its relationship with its client.

3.4. Legitimate interests of Sycomore AM

While ensuring a fair balance and duly considering your rights and freedoms, particularly your right to privacy, the Company processes Data to achieve its legitimate interests.

In this situation, Sycomore AM will always seek to minimize the impact of the intended processing to preserve this balance.

Data is thus processed for, among other things:

- Personalizing our services;
- Studying and analyzing the market and competition to better position ourselves against the latter;
- Analyzing and managing risks and performing actuarial or statistical calculations;
- Managing claims or litigation;
- Archiving and evidentiary needs;
- Preventive and operational management of physical and IT security;

- Preventing and combating fraud, abuse, or other offenses;
- Coordinating clients and client groups to increase synergy and overall efficiency;
- Using cookies necessary for navigation on our website;
- Improving the operational functioning of the Company, the quality of its service, and its processes, notably:
 - By conducting surveys, statistics, and analyzing comments left on various platforms and social networks (Twitter, LinkedIn, Facebook, Instagram, etc.);
 - By ensuring continuous training of our employees based on the recording of certain telephone conversations;
 - By centralizing client management.

In case of objections to these processes, the conditions for exercising the right to object are described in Article 8.

3.5. Consent for sending electronic communications

After specifically requesting consent, Sycomore AM may process Data, including phone numbers and email addresses, to send invitations to events, advertisements, or personalized offers during marketing actions or via newsletters.

If you no longer wish to receive electronic communications, the Company always offers the possibility to object to this Data processing free of charge and at any time. Processing your request and updating our systems may take a few days, during which you may receive commercial solicitations related to already launched marketing campaigns. For more details, please refer to Section 8 of this Policy, describing your rights during Data processing, and Section 9, detailing how to exercise them.

4. What type of Data is processed by Sycomore AM

Sycomore AM may process different types of Data, including those belonging to the various categories described in the table below.

Categories	Types of Data
Identification Data	Such as: Name and surname, gender, professional postal address, national registry number, tax residence.
Contact Data	Language, landline or mobile phone number, email address, as well as more technical Data such as: IP address, and more generally the identification Data of devices used to connect to our services.
Professional Situation	Professional situation, employer's name.
Investment Profile	We are legally required to determine the risk profile of our clients before offering investment products or giving advice on this matter. To this end, we evaluate the objectives and duration of financial investments and placements, personal financial situation, including the ability to bear losses, risk propensity, actual knowledge, and experience in financial matters of our interlocutors.
Satisfaction with our services	Various comments or suggestions made through the different communication channels available or via social networks.
Audiovisual Data	We record telephone conversations you have with the Company's employees. We use cameras and surveillance systems in strict compliance with legal requirements.

Certain Data from public sources or obtained through third parties	Such as: Data subject to a publication obligation (Official Journal, Trade and Companies Register...), transmitted by a public institution such as the tax administration, courts and tribunals or the public prosecutor's office, and/or publicly accessible on open networks (website, blog, social networks) or from press publications.
Data collected via cookies	We use cookies, which are small text files created by a program on the Company's server and stored on the user's device hard drive. They can serve various roles: retaining your preferences, collecting statistical data, adapting the content and/or advertising of websites according to needs.

5. Who does Sycomore AM share the Data with?

In the context of the purposes mentioned above, Sycomore AM may communicate Data to the recipients listed below.

5.1. Supervisory authorities and public authorities

The Company is required, under current regulations, to communicate certain Data (information or documents about its clients, their beneficiaries and/or beneficial owners, their accounts, and the transactions it has carried out) to supervisory authorities and public authorities such as:

- Public authorities, market authorities, national and international regulators, supervisory authorities, tax authorities, or other similar foreign, European, or international authorities;
- Any judicial or administrative authority in general.

We will always strive to limit the transmission of Data and will only do so if and to the extent that the Company is required to transmit it.

5.2. Subcontracting and specialized third parties

Sycomore AM may decide to communicate Data to third-party entities if it subcontracts certain services to specialized third parties or if a legitimate interest motivates it.

The communication of Data in this context is always carried out within the strict limits necessary for the realization of the services concerned by this subcontracting. We also pay particular attention to the choice of these specialized third parties. Thus, the Company always ensures it obtains commitments from its subcontractors regarding security and confidentiality when they process Data, including ensuring that access to Data is limited and that it is protected by appropriate technical and organizational measures. Sycomore AM also verifies that the processing is carried out in accordance with the instructions it communicates to its subcontractor.

In this context, the Company may communicate Data, notably to the following parties:

- Subcontractors, agents, or service providers who work for us (including their employees, directors, and officers);
- All intermediary distributors and brokers who connect you with us or deal with us on your behalf.

5.3. Transfer of Data outside the European Economic Area (EEA)

To date, Sycomore AM is not required to communicate Data outside the EEA.

However, if this situation changes, the Company commits to only transferring Data to countries that do not ensure an adequate level of protection, strictly in cases provided for by the General Data Protection Regulation (GDPR).

Sycomore AM will take all necessary measures to ensure that the Data is duly protected in the destination country, notably by ensuring that the protection of this Data is guaranteed by appropriate contractual provisions or by any other means offering an adequate level of security.

6. How long is the Data retained?

Sycomore AM retains Data for the time necessary to fulfill the specific purposes for which it was collected, as well as to meet its legal and tax obligations, for evidentiary purposes, to conduct internal audits, or to respond to information requests from competent authorities.

Please note that we may retain your Data even if you decide to no longer use our services, particularly to comply with applicable legislation, defend our interests, or assert our rights. We will not retain it longer than necessary and, when we no longer need it, we will securely destroy it in accordance with our internal Policy or render it completely anonymous.

Certain Data may be retained for an additional period for the management of claims and/or litigation, as well as to meet our legal or regulatory obligations or to respond to requests from authorized authorities.

7. Data Security

Sycomore AM takes the necessary measures, including organizational and technical measures, to ensure the confidentiality and integrity of Data, systems, and processing services under its control, as well as the security of their processing in compliance with legal requirements.

Our staff will only access Data when it is relevant to the performance of their duties. Our employees are bound by strict professional discretion and must respect the confidentiality of Data.

Our premises, as well as access to our servers and networks, are strictly protected, and we pay particular attention to the choice of our suppliers and business partners to ensure that any transfer or processing of Data carried out by them is fully secure.

Technical protection measures are also implemented by the Company to offer an ever-higher level of security. These measures may include the implementation of firewalls or antivirus software.

8. What are your rights?

You have the following rights regarding the processing of your Data.

8.1. Right to access and receive your Data

You can review the Data concerning you and request the following information: whether we process your Data; the purposes for which your Data is processed; the different categories of Data that are processed; the recipients to whom it is communicated and how we obtained your Data.

This right allows you to request Sycomore AM to provide your Data in a structured, accessible, and readable format when the processing is carried out by automated means.

8.2. Right to obtain the rectification of your Data

You can, at any time, request us to rectify your Data when you find it incomplete or incorrect.

To keep your Data perfectly up to date and to offer you quality service, we thank you for informing us of any changes.

8.3. Right to obtain the erasure of your Data

You can obtain the deletion of your Data or render it unusable based on the reasonable technical means available to Sycomore AM.

However, the company may refuse to proceed with this operation when it must continue to process your Data for compelling reasons, particularly when it is necessary for the company to meet its legal or regulatory obligations, for evidentiary purposes to maintain a transaction history, or to fulfill its contractual obligations.

8.4. Right to object to the processing of your Data

You have the right to object to the processing of your Data by Sycomore AM. The Company may, however, refuse this request, particularly in circumstances where Data processing is necessary. Thus, we will continue to use it (i) if the law requires it, (ii) if we must fulfill a contractual obligation, (iii) if it is in the public interest, or (iv) if we have a legitimate interest in doing so. We also draw your attention to the fact that your objection to the processing of your Data for purposes other than marketing may lead Sycomore AM to terminate its contractual relationship with you.

8.5. Right to withdraw your consent

You can withdraw your consent for the processing of your Data by the Company at any time. However, unless you terminate the contract between you and Sycomore AM, the Company may, after balancing your interests and its own, continue to process some of your Data.

You can make your request through the various communication channels provided by the Company. You can also change your mind through these same means.

Despite the above, exercising your right to object does not prevent Sycomore AM from contacting you for purposes other than those specified above, particularly due to a legal obligation or to carry out the execution of a contract.

8.6. Right to Data portability

When we process your Data based on your consent or the existence of a contract, you have the right to obtain that your Data be transmitted directly to another data controller, where technically feasible for the Company. Note that this right only applies to the data you have provided to us.

8.7. Right to restrict the processing of your Data

You have the right to request that the processing of your Data be limited in certain specific cases:

- When you have contested the accuracy of your Data, for the time necessary for corrections;
- When the processing is unlawful but you do not wish your Data to be erased;
- When the Data is no longer necessary for the agreed processing, but you consent to its retention for legal purposes;
- When you have exercised your right to object to the processing.

8.8. Right to object to communications for advertising (marketing) purposes

You can object, free of charge and upon request, to the processing of your Data for marketing purposes.

When you exercise this right, the Company will stop sending you advertising solicitations to your email address. Your request will be processed as soon as possible.

9. How can you submit a request related to the GDPR Policy?

9.1. General request

Any request related to the exercise of your rights can be made at any time and free of charge by sending a written request to the Company.

You simply need to submit a dated and signed request, written clearly and precisely.

We will ask you to attach a copy of your identity card to ensure that no one else exercises your rights on your behalf. We reserve the right to contact you directly to verify the authenticity of this request.

You can make this request by postal mail to the address: Sycomore AM Data Protection Officer, 14 avenue Hoche – 75008 Paris or via email at: rgpd@sycomore-am.com.

If you wish to obtain additional information on the protection of your Data, you can do so with the National Commission for Information Technology and Civil Liberties ("CNIL") by visiting their website: <https://www.cnil.fr/>.

9.2. Request related to direct marketing activities

You can make your request through the various means provided by the Company:

- By clicking on the "Unsubscribe" link in one of the emails or electronic newsletters sent by the Company;
- By postal mail with a copy of your identity card to the attention of our Data Protection Officer at the address Sycomore AM – 14 avenue Hoche – 75008 Paris;
- Via email at: rgpd@sycomore-am.com.

9.3. Right to file a complaint

In case of a conflict regarding the processing of your Data, you can contact the Company at the following address:

- By postal mail to the address: Sycomore AM Data Protection Officer, 14 avenue Hoche – 75008 Paris;
- By sending an email to: rgpd@sycomore-am.com.

You also have the right to file a complaint with the CNIL (send a letter to the following address: CNIL – 3 Place de Fontenoy – TSA 80715 – 75334 Paris – Cedex 07).