

## PRIVACY POLICY OF INVESTORS' PERSONAL DATA

### 1. Why?

This privacy policy aims to inform you of how Metori Capital Management ("**Metori**") processes your Personal Data (as defined below) (the "**Privacy Policy**") for the performance of the agreement concluded between Metori and your employer/partner.

To this end and within the meaning of the Regulation (as defined below), the term « **Personal Data** » means any information relating to an identified or identifiable natural person, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier, or to one or more specific features to his or her physical, physiological, genetic, mental, economic, cultural or social identity.

Please read carefully the Privacy Policy, as well as any other document relating to the processing of your Personal Data which would be communicated to you by Metori.

### 2. Metori acting as a data controller

Metori determines the purposes and means of processing your Personal Data and acts as a data controller.

#### **Metori Capital Management**

*Société par actions simplifiée, 823 656 541 00021 RCS de Paris*

*9 rue de la Paix – 75002 Paris*

info@metori.com

Data protection officer: Carlos Gutiérrez | [carlos.gutierrez@metori.com](mailto:carlos.gutierrez@metori.com)

Metori undertakes to comply with the "**Regulation**", which covers all legal provisions applicable to the protection of Personal Data, and in particular (i) Regulation (EU) 2016/679 of April 27, 2016, on data protection (hereafter, the "**GDPR**"), (ii) Directive 2002/58/EC of July 12, 2002, and (iii) French legal provisions, including Law 78-17 of January 6, 1978, as amended

### 3. What are the Personal Data processing activities operated by Metori?

Metori processes your Personal Data to the extent strictly necessary for the fulfillment of the purposes detailed below on the following legal basis:

Legal basis	Purposes	Storage period
Compliance with legal and/or regulatory obligations	Compliance with legal and/or regulatory obligations (verification of client identity, origin of funds and transmission of information to authorities, fraud prevention, management of access requests etc.)	No longer than the storage period required to comply to legal and regulatory obligations
Metori's legitimate interest in performing the agreement and developing its business activity	Performance of the agreement (subscription, account opening and management), development of business activity, newsletter	The duration of the agreement and then five (5) years from the end of the commercial relationship

METORI CAPITAL MANAGEMENT

Portfolio management company approved by the AMF under the GP N. 17000002 as of 06/02/2017

SAS with a share capital of 772.131 € - RCS Paris B 823 656 541

Registered Office: 9 rue de la Paix, 75002, Paris

Metori will only use your Personal Data for the said purposes, unless Metori reasonably believes that the Personal Data should be processed for other purposes consistent with the original purposes. In any event, Metori will inform you of such further purposes.

#### **4. How does Metori collect your Personal Data?**

Metori collects your Personal Data for instance when you visit the website <https://www.metori.com/> (by subscribing to our newsletter, by creating an account etc.), during professional meetings or when your employer/partner enter into an agreement with Metori.

#### **5. What Personal Data is processed by Metori ?**

Metori processes the following categories of Personal Data about you: name, surname, business contact (phone and email).

#### **6. Who are the recipients of your Personal Data?**

Metori only shares your Personal Data with a limited list of recipients and only for the purposes mentioned above and the tasks entrusted to them.

Thus, the recipients of your Personal Data are:

- *Internal recipient:* Metori's management and commercial departments.
- *External recipients:*
  - IT services providers in charge of data hosting, data management, emailing, middle office.
  - Services providers in charge of legal support, accounting, compliance and internal control ("RCCI").
  - Financial and supervisory authorities and judicial or administrative authorities.

Metori ensures that these recipients are required to take appropriate security and confidentiality measures to comply with this Privacy Policy.

Processors process your Personal Data in compliance with the Regulation and are not authorized to process your Personal Data for any purposes other than those described in article 3.

#### **7. Are your Personal Data transferred outside of the European Union?**

Your Personal Data collected by Metori may be transferred to, accessed from and stored in a country located outside the European Union.

Metori will only transfer Personal Data outside the European Union in a secure manner and in accordance with the Regulation.

Some countries may not have laws governing the use and transfer of Personal Data as protective as the Regulation, Metori is committed to taking all necessary measures to ensure that the recipients of your Personal Data comply with the Regulation and the terms of the Privacy Policy.

These measures may include monitoring the recipients' privacy and security standards and/or signing appropriate agreements.

## 8. What security measures does Metori implement?

Metori implements technical and organizational measures to protect your Personal Data from accidental or unauthorized destruction, alteration, loss or disclosure.

These measures are evolving to ensure better protection, security, integrity and confidentiality of your Personal Data.

## 9. What are your rights and how to exercise them?

You have the following rights regarding the processing of your Personal Data by Metori :

- **right to be informed:** you have the right to be informed of the Personal Data that Metori holds and that concern you, as well as the processing carried out by Metori. This is precisely the purpose of this Privacy Policy.
- **right to access:** you have the right to access all your Personal Data that Metori holds. You can exercise this right by sending a simple request to Metori at the address mentioned in this Privacy Policy.
- **right to rectify or to complete:** in the event that you believe your Personal Data is incomplete or erroneous, you may request Metori to rectify it, which Metori will do as soon as possible.
- **right to delete:** in some cases, you may request Metori to delete your Personal Data ("right to be forgotten"); however, this is not an unfettered right, as Metori may have legal or legitimate reasons to retain your Personal Data in some cases.
- **right to limit:** in certain cases, listed in Article 18 of the GDPR, you may request Metori to limit the processing of your Personal Data.
- **right to transfer:** you have the right to the portability of your Personal Data, in a structured, commonly used and machine-readable form. You are, therefore, free to transmit your Personal Data to a recipient of your choice without Metori being able to object. However, this right only applies if the processing of your Personal Data is based on your consent or on the performance of an agreement, and the processing is carried out using automated processes.
- **right to object:** where the processing of your Personal Data is based on Metori's legitimate interest, you have the opportunity to object to such processing. Metori will then stop processing your Personal Data unless there is a legitimate reason for the processing. You also have the right to object at any time to the processing of your Personal Data for commercial prospecting purposes. Finally, you have the right to unsubscribe from our newsletter by simply clicking on the "Unsubscribe" link at the bottom of each newsletter.
- **right to file a complaint:** you always have the right to file a complaint before the French authority (*Commission Nationale de l'Informatique et des Libertés*).
- **right to define instructions after your death:** you can communicate your instructions, revocable at any time, regarding the conservation, erasure, communication of your Personal Data after your death by designating a person in charge of their execution:
  - when they are general directives, you can transmit them to a trusted digital third party certified by the French authority
  - in the case of specific directives, you may transmit them directly to Metori.

You may exercise all or part of your rights or receive additional information by sending a request to Metori at any time, accompanied by a copy of your ID card, which will allow Metori to verify your identity:

- by email to: [info@metori.com](mailto:info@metori.com)
- by mail to: Metori Capital Management, 9 rue de la Paix, 75002 Paris.

A reply will be sent to you within one (1) month of receipt of your request.

#### **10. Modification of the Privacy Policy**

Metori reserves the right to modify the Privacy Policy, at any time, according to the legal and regulatory context and the recommendations, opinions and decisions of the French Authority, the European Data Protection Committee, and the French and European courts.

#### **11. Do you have a question?**

If you have any questions about Metori's commitment to the protection of Personal Data, please contact us at the following address: [info@metori.com](mailto:info@metori.com)

*Last updated on 2022/08/10.*