

# PRIVACY POLICY

## 1. Purpose of This Document

This Privacy Policy applies to personal information collected and processed by ECM FUND MANAGEMENT LTD, in their capacity as data controllers of personal data of data subjects as such terms are defined in the relevant General Data Protection Regulation (EU) 2016/679 ("GDPR"). ECM FUND MANAGEMENT LTD is a private limited liability company incorporated under the laws of the Republic of Cyprus with registration number HE 476804, with its registered office at Anastasiou G. Leventi 5A, 10th Floor, Office 1001, 1097 Nicosia, Cyprus. The Company is authorised and regulated by the Cyprus Securities and Exchange Commission ("CySEC") under license number AIFM68/56/2013 as an Alternative Investment Fund Manager ("AIFM"), in accordance with the Alternative Investment Fund Managers Law of 2013 (L.56(I)/2013) and relevant European Union regulations, including Directive 2011/61/EU (the "AIFMD") as amended from time to time (hereafter referred to as the **"Fund Manager" or the "Company"**). The present policy provides information on how the Fund Manager collects, processes, and uses your personal data when you use this website, including any data you may provide upon conclusion of your relationship with the Company depending on the nature of such relationship.

The Fund Manager is committed to safeguarding the privacy and personal data of individuals engaged in its operations, including employees, consultants, and service providers, in accordance with GDPR, the Law 125(I)/2018 of the Republic of Cyprus, and relevant regulatory frameworks applicable to the financial sector.

## 2. Data Protection Principles

The Company processes personal data in accordance with the fundamental principles laid out in the GDPR. Personal data is processed lawfully, fairly, and in a transparent manner. It is collected for specified, explicit, and legitimate purposes and is not further processed in ways that are incompatible with those purposes. The data that is collected by the Company is limited to what is necessary and proportionate in relation to the purposes for which it is processed, and we strive to ensure it is accurate and up to date. Personal data is retained only for as long as necessary to fulfill the identified purposes or to comply with legal obligations. Appropriate security measures are implemented to prevent unauthorized access, loss, or misuse of personal data.

## 3. Categories of Personal Data We Process

The Company may process a range of personal data depending on your relationship with the Company. For employees, consultants, and service providers, this includes identification and contact details such as name, address, email, and telephone number; identification documentation and tax information; banking details for payment purposes; curriculum vitae, educational background, and references; employment or contractual documentation including performance evaluations; internal communication and electronic records; and health-related data where required and lawfully collected, for example in connection with sick leave or occupational safety.

For well-informed and professional investors in the funds we manage, we process personal data necessary for the establishment and ongoing administration of the investment relationship. This includes full name, contact details, and identification documentation such as a passport or national ID card. We may also collect source of wealth and source of funds declarations, banking and payment details, information on investment transactions and holdings, tax residency status, and supporting documentation in compliance with applicable legislation. Additional personal data may be obtained through onboarding questionnaires or subscription forms as part of our know-your-customer (KYC) and anti-money laundering (AML) procedures and compliance. Processing of this data is necessary for compliance with legal obligations and to fulfill our duties under fund administration, investor servicing, and financial supervision.

#### **4. Sources of Data**

Personal data is primarily collected directly from you, through your application forms, contractual agreements, correspondence, or onboarding processes. In some cases, data may be obtained from third-party sources such as your employer, corporate service providers, legal or financial advisors, publicly available databases, or authorized intermediaries or representatives. For investors, personal data may also be collected from fund administrators, KYC platforms, or custodians, in accordance with regulatory requirements and subject to appropriate safeguards.

#### **5. Legal Grounds for Processing**

Your personal data is processed only where permitted under applicable data protection laws. These lawful bases include compliance with legal obligations (for instance, in fulfilling regulatory requirements under AML or tax laws); performance of a contract (such as an employment agreement or subscription to an investment); and the Company's legitimate interests, which may include internal administration, fraud prevention, and protecting legal claims. In certain circumstances, we may request your explicit consent to process specific categories of personal data, such as health information. Where consent is the legal basis for processing, you may withdraw it at any time by contacting our Data Protection Officer.

#### **6. Data Retention**

The Company retains personal data only for as long as necessary to meet the purposes for which it was collected or to satisfy legal, regulatory, or contractual obligations. For investors in the funds managed by the Company, personal data is retained for the full duration of the investor's holding in the fund and for an additional period thereafter as required by applicable laws, including anti-money laundering and tax reporting regulations. For employees, consultants, and service providers, personal data is generally retained for at least seven years following the end of the engagement or for a longer period where legally required or where necessary to support legal or regulatory proceedings. When the retention period has expired and data is no longer necessary, it is securely deleted or anonymized.

## **7. Data Sharing and International Transfers**

Personal data may be shared with selected third parties, where such disclosure is required for regulatory, operational, or legal purposes. These third parties may include fund administrators, custodians, depositaries, auditors, legal advisors, compliance consultants, tax advisors, and technology or IT support providers. Regulatory and supervisory authorities may also receive personal data where legally obligated. Where data is transferred outside the European Economic Area (EEA), appropriate safeguards such as standard contractual clauses approved are applied to ensure data protection in line with GDPR requirements.

## **8. Data Security**

The Company applies a range of appropriate technical and organizational measures to protect personal data against unauthorized access, loss, destruction, or misuse. These include access controls, secure IT systems, encryption, physical security for data storage, data minimization practices, employee training, and regular audits. All employees and third-party providers are subject to confidentiality obligations, and only personnel with a clear operational need are granted access to personal data.

## **9. Your Rights Under the GDPR**

You have specific rights under the GDPR with regard to your personal data. These include the right to access your data and receive a copy of the information the Company holds about you; the right to request correction of any inaccuracies; and, in certain circumstances, the right to request the deletion of your data or restriction of its processing. You also have the right to object to processing based on legitimate interests, and the right to request that your data be transferred to another controller (data portability). Where we rely on your consent for data processing, you have the right to withdraw that consent at any time. Additionally, you may lodge a complaint with the Office of the Commissioner for Personal Data Protection in Cyprus via [www.dataprotection.gov.cy](http://www.dataprotection.gov.cy).

## **10. Data Protection Officer (DPO)**

If you have any questions or concerns regarding this Privacy Notice, or if you wish to exercise your rights under the GDPR, you may contact the Company's designated Data Protection Officer at:

**Email:** [dpo@ecm-aifm.com](mailto:dpo@ecm-aifm.com)

**Data Protection Officer:** Athos Myrianthous

## **11. Updates to This Notice**

This policy may be updated periodically to reflect changes in our data protection practices, regulatory updates, or operational changes. The most recent version will always be made available via internal communication channels or posted on the Company's website.