

INFORMATION NOTICE FOR SUPPLIERS, BUSINESS PARTNERS, EXTERNAL CONSULTANTS AND THEIR CONTACTS

This information notice (the “**Notice**”) applies to the processing of the personal data of suppliers, business partners, external consultants, and their contacts (“**Data Subjects**”) by Mindful Capital Partners S.A. (“**MCP**”, “**Company**”, “**we**” or “**us**”) in accordance with Regulation (EU) 2016/679 – General Data Protection Regulation (“**GDPR**”) and any other applicable Luxembourg legislation on the protection of personal data (“**Data Protection Laws**”).

1. Contact details of the data controller

The data controller is MCP, with registered office in 10, rue Antoine Jans, L-1820 Luxembourg. For any requests regarding the processing of Data Subjects personal data, please email our Privacy Champion at corporate@mcpinvest.com.

2. Purposes and legal bases for processing

MCP may process in whole or in part, depending on the circumstances, the categories of personal data shown below, manually or by electronic means, for the purposes and upon the legal bases indicated below:

Purpose	Legal basis	Categories of data (non-exhaustive list)
Data Subjects personal data may be processed for the purpose of complying with our legal obligations - including Anti-Money Laundering and Counter Terrorist Financing, as well as related administrative and accounting obligations - or other obligations arising out of the instructions received from the competent authorities.	Processing is necessary for compliance with a legal obligation to which the data controller is subject (art. 6(1)(c) of the GDPR).	Data Subjects’ personal data: identification information, such as ID card or passport, KYC information and data relating to criminal convictions and offences, bank details.
Data Subjects personal data may be processed for the purpose of establishing, managing and performing the relevant contractual relationship.	Processing is necessary for the performance of a contract with the Data Subjects or in order to take steps at their request prior to entering into a contract (art. 6(1)(b) of the GDPR).	Data Subjects’ personal data: identification information, email address, telephone number and professional qualification.
To claim or defend MCP’s rights.	Processing might be necessary under our legitimate interests (art. 6(1)(f) of the GDPR).	Data Subjects’ personal data, such as those included above.

3. Data retention

Personal data shall be kept for the time strictly required to perform the above-mentioned purposes, in any case for no longer than 10 (ten) years after the termination of the contract, unless a longer retention period is required under the applicable law, by the competent authorities or it is necessary for the exercise of a legal claim.

4. Provision of personal data

The processing of personal data is necessary for the purposes referred to in point 2 above. Refusal to supply the requested data or the supply of inaccurate data may entail the impossibility to enter into or continue the contractual relationship (in any case, as indicated below, the Data Subjects may object to the processing at any time, unless MCP proves the existence of compelling legitimate interests for processing that prevail over the interests, rights and freedoms of the Data Subjects or the processing is necessary to exercise or defence MCP's rights).

5. With whom we share Data Subjects data

We may share Data Subjects data with our branches/subsidiaries, contractors, service providers, consultants and commercial partners as well as any competent judicial, administrative or regulatory authority.

6. Transfers of data

Any personal data concerning the Data Subjects could also be transferred outside of the European Economic Area ("EEA"). In these cases, we will take appropriate safeguards to ensure adequate protection of Data Subjects personal data verifying that data is transferred to a country ensuring an equivalent level of protection of data than that set under the GDPR. Alternatively, we will adopt adequate safeguards, for example, by entering into specific agreements with the recipients of the data, including the standard contractual clauses of the EU Commission.

7. Rights of Data Subjects

Data Subjects have the following rights, as specified in the GDPR:

- The right of access to Data Subjects personal data;
- The right to obtain the updating or rectification of Data Subjects personal data;
- Under certain conditions, the right to obtain the cancellation of Data Subjects personal data, the right to restrict the processing of Data Subjects personal data, and right to data portability;
- The right to object to the processing of Data Subjects personal data under legitimate grounds;
- Where the processing is based on Data Subjects consent, the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

To exercise Data Subjects rights, you may contact us, in writing by sending a letter to our headquarters, or by sending an email to our Privacy Champion at corporate@mcpinvest.com. Data Subjects also have the right to lodge a complaint with the *Commission Nationale pour la Protection des Données* ("CNPD").

8. Notice update

We may modify or update this Notice, also in view of future changes in the Data Protection Laws or in case we implement new features or functionalities that will process personal data. Document version: February 2023.