
Privacy Notice

Protecting Your Privacy



This Privacy Notice provides you with the necessary information regarding your rights and obligations, and explains how and when we collect and process your personal data.

Identity of Entity collecting data: Veritas Investment Associates SAS (VIA AM).

VIA AM shares some necessary information required for the efficiency of the partnership with Eric Sturdza Management Company S.A, in order to support funds operations and distribution. For more information on our organization please go [to Link](#).

Information That We Collect

We process your personal information to meet our legal, statutory and contractual obligations. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this Privacy Notice.

The Data We Hold

The type of data we may collect and process includes:

- Contact details (including names, postal addresses, email addresses and telephone numbers);
- Information required for VIA AM to meet legal and regulatory requirements, in particular in respect of anti-money laundering legislation, including information on source of funds and source of wealth;
- Financial information, such as payment related information;
- Meetings attended and visits to our / your offices;
- Any other information you may provide to us.

How We Use Your Personal Data

VIA AM takes your privacy very seriously and will never disclose or share your data outside VIA AM and VIA AM providers or partners without your consent; unless required to do so by law.

Under no circumstances will we ever sell your data.

We only retain your data for so long as is necessary for the purpose(s) specified in this Privacy Notice.

Where you have consented to us providing you with marketing materials, you are free to withdraw this consent at any time.

The purposes and reasons for processing your personal data are detailed below:

-To enter into client relationships, any one or more of the following:

The legitimate interest of VIA AM as a provider of investment management services to process personal data in the performance of its contractual obligations.

In instances where an individual provides by himself personal data, the processing may be carried out on the basis of consent. Consent may be withdrawn at any time in writing by contacting info@via-am.com.

-To manage our client and other business relationships:

The legitimate interests of VIA AM to seek to ensure its business is conducted efficiently and with a view to enhancing its services.

-To ensure the security of our systems, staff and premises:

The legitimate interests of VIA AM in protecting its systems, staff and premises from being misused or the victim of any criminal activity.

-To provide our contacts with marketing material and to invite contacts to events which may be of interest to them and to manage such mailings and events:

The legitimate interests of VIA AM as a provider of investment management services to process personal data to communicate with individuals on topics and events which may be of interest to those individuals.

Any requests to unsubscribe may be made by emailing info@via-am.com.

-To meet all legal and regulatory obligations applicable to VIA AM:

The legitimate interests of VIA AM as a provider of Management Company services to process data to the extent necessary to ensure it meets all legal contractual and regulatory obligations incumbent on it.

Your Rights

Data subjects in the European Union (or any jurisdiction with equivalent legislation to the European Union General Data Protection Regulation) have certain rights in respect of their personal data.

Any such data subject wishing to exercise their rights under applicable data protection laws (including the right to withdraw any consent to processing previously given; the right of access to data, or to have data updated, rectified or erased; or to object to any particular processing) should send the request in the first instance to info@via-am.com.

In the case in which a data subject chooses not to provide any personal data or where any of the rights set out above are exercised to limit the processing of personal data, we may be unable to provide relevant services, or there may be a restriction on the services that can be provided.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this Privacy Notice or where there is a legal requirement to do so. VIA AM uses third-parties to provide certain business functions; however all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this Privacy Notice, the data protection laws and any other appropriate confidentiality and security measures as may be appropriate. The third parties with which we may share or disclose your personal data include the following:

- Any sub-contractors, agents or service providers of VIA AM;
- Third parties with whom VIA AM engages for hosting events or other marketing initiatives;
- Regulators or other governmental or supervisory bodies.

Safeguarding Measures

VIA AM takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorized access, alteration, disclosure or destruction and have several layers of security measures in place, including:

- Restricted access
- IT authentication
- Firewalls and anti-virus

Transfer Outside the EU

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) starting with 25th of May 2018. Some countries may not necessarily have the same high standard of protection of your personal data. Personal data collected from you or provided by you may be transferred outside of EU, e.g. Guernsey (the Channel Islands).

We will take steps to ensure that we use the necessary level of protection for your information and abide by strict agreements and measures to protect your data and comply with the relevant data protection laws.

How Long We Keep Your Data

VIA AM only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. VIA AM policy is to retain data for 5 years from the conclusion of the relationship after which time it will be destroyed. This is subject to certain exceptions (records may be kept indefinitely) in instances where the personal data is relevant to a dispute after closure of a matter.

Changes to this Privacy Notice

We will keep this Privacy Notice under review and any updates will appear on our website.

We last updated this Privacy Notice on 22 May 2018.

How to contact us

If you have any questions about this Privacy Notice or any data which we hold about you, please contact: info@via-am.com.

If you have any questions or comments about the information contained in this statement and/or any other privacy enquiries, including if you want to complain about VIA AM's collection and use of personal data, please contact:

The Data Protection Officer (DPO) of VIA AM: Guillaume Dolisi

Phone: +33 1 85 73 22 46

Email: guillaume.dolisi@via-am.com

Right to lodge a complaint with the Regulator (“Data Protection Authority”)

If you have any concerns about VIA AM's information rights practices, we would hope you would contact the DPO in the first instance. However, if you are still dissatisfied, you can complain to the relevant local Data Protection Authority via the link below.

France: Commission Nationale de l'Informatique et des Libertés (CNIL) www.cnil.fr