



R+V AIFM S.à.r.l

WEBSITE PRIVACY NOTICE

Last updated: May 2025



Website Privacy Notice

1 Introduction

In accordance with article 13 of the General Data Protection Regulation (“GDPR”), R+V AIFM S.à r.l (“AIFM” or “Company”), as data controller may process, by electronic or other means, the personal data of website users, including prospects or data subjects reaching out via the Company’s contact references as included within the website (“Data Subjects”).

The current Privacy Notice describes to Data Subjects of the Company how their personal data are collected and processed and provides further explanation on the purposes, legal basis, sharing and transfer of personal data, as well as rights that Data Subjects have in relation to their personal data.

We may update this notice from time to time and timely include the latest version within the Company website. If you have questions, please feel free so send an email to the AIFM Data Protection Coordinator at dataprotection@ruv-aifm.lu.

2 What are the applicable legal basis, processing purposes and categories of personal data?

Legal basis	Processing purpose	Personal data
Request of the data subject prior to entering into a contract (article 6(1)(b) GDPR)	<ul style="list-style-type: none"> Reply to your queries when reaching out the Company via the contact details provided on the Company’s website To run restricted user area, verify login data, or to check pricing features 	<ul style="list-style-type: none"> Identity and personal information (e.g., name, surname, gender) Contact information (e.g., email address, telephone number, address) Professional information (e.g., title) IT data (e.g., IP address currently used by your PC, the date and time, and the pages you view, log data) Technical cookies Any other information shared on voluntary basis by the Data Subjects
Legitimate interest (article 6(1)(f) GDPR)	<ul style="list-style-type: none"> Run our business, including managing our relationship with you, meeting our administrative, accounting and corporate obligations Maintaining and using out IT systems and facilities, such as the website. Record blocked or malicious website accesses, to ensure forensic activities and the security and stability of our website 	
Consent	<ul style="list-style-type: none"> Extend occasional offers, inform about new products or services and other services that may be of interest to you 	

2.1 Cookies

Cookies are small text files stored on the internet user’s device. They are used to control the internet connection while visiting websites.

We only use technical cookies to operate our website, to ensure its functionality. These cookies are deleted after you leave the website.

3 Transfer of personal data to third parties

Personal data will not be exchanged with any third parties, except to entities required for the performance of the processing of personal data for the aforementioned purposes. To this end, the Company may exchange personal data with external service providers (e.g. IT service providers), affiliates or other entities at group level (the “Recipients”).

We may also share your personal data with different governmental authorities, institutions or agencies (or similar), or insurance companies where required by law for the purpose of their regulatory tasks. We may also need to share your personal data with a regulator or to otherwise comply with the law.

In such cases, the Company ensures that relevant Recipients process personal data only in accordance with dedicated instructions and/or based on adequate privacy and data protection measures and contractual framework. The Recipients are generally located in the European Union or in countries outside of the European Union ensuring an adequate level of protection of personal data. If not, the Company and the Recipients put in place appropriate transfer safeguards, such as EU standard contractual clauses to ensure the relevant personal data is adequately protected.

4 Further processing and change of purpose

We will not use your personal data for any reason other than for the purposes indicated in this privacy notice. If we need to use your personal information for an unrelated purpose or a subsequent purpose due to the nature of Data Subject’s requests (e.g. recruitment, business relationships or clients service), reference should be made to the dedicated information notice of the Company available on the website, namely:

- Privacy Notice for Investors and Business Partners
- Recruitment Privacy Notice

5 Personal data retention period

Personal data will be stored for the longest of the following periods: (i) as long as is necessary for the purpose of which it was collected, (ii) any retention period that is required by law or (iii) the end of the liability period in which litigation or investigations might arise in respect of our services and business.

After the applicable retention period(s) have expired, personal data will be deleted or anonymized.

6 Your rights in connection with personal data

Under certain circumstances, you have the right to:

- **Request access** to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are collecting and using it lawfully.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to use it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.

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- **Request the restriction** of collecting and using your personal data. This enables you to ask us to suspend the usage of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the data portability** of your personal data to another party, namely ability to move your personal data among different application, programs or computing environments.
- **Right to lodge a complaint to supervisory authority** (*Commission Nationale pour la Protection des Données*, <https://cnpd.public.lu/en/particuliers/faire-valoir.html>).
- **Right to withdraw the consent.** In circumstances where you have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

You can exercise your rights by informing in writing the Company's Data Protection Coordinator (dataprotection@ruv-aifm.lu).

In order to meet your request we may need to request specific information from you to help us confirm your identity and ensure you are entitled to exercise the relevant right.

Exercising your rights is free from charges. However, we have right to refuse to fulfil or charge a reasonable fee for fulfilling of several similar consecutive requests or requests that are manifestly unfounded or excessive. We are also entitled to decline requests on statutory grounds in which cases we will inform you of such decline including the grounds for the decline.

7 Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us.

