

Arena Wealth Management S.A. – Privacy policy

Effective date

This Privacy Policy is effective as of May 25, 2018 and replaces any previous Privacy Policy or equivalent that was in application before the Effective date.

Legal background

Arena Wealth Management S.A. (“the Company”) is a “société anonyme” registered with the Luxembourg Register of Commerce under the number B 144.237 with registered office at 31 Grand-rue, L-1661 Luxembourg.

The Company is a Professional of the Financial Sector, duly authorized to act, under supervision of the Commission de Surveillance du Secteur Financier (the CSSF), as an investment adviser, a broker in financial instruments, a commission agent and a private portfolio manager under articles 24 to 24-3 of the amended Law of April 5, 1993 relating to the financial sector in Luxembourg.

The current data protection legislation includes Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation, or “GDPR”) which entered into force on May 25, 2018; as well as any other national or supranational applicable law.

The Company collects and processes personal information relating to all natural persons being Clients, prospects, or related counterparties (the “Data Subjects”) and is therefore acting as Data Controller as per the GDPR.

Categories of personal information collected

- Name, surname, contact information such as phone and e-mail, address, tax residence, tax number;
- Civil status, passport copy, NID;
- Profession/activity, education background, annual income, total wealth, source of wealth, origin of funds to be under management;
- Information about potential PEP or High Risk status;
- Investment profile/strategy;
- Knowledge and experience in financial instruments/investments;
- Risk profile.

Purposes of collection and processing of personal information

- Performance of a contract: collection and processing necessary to be able to render a service to a Client following signature of a Discretionary asset management agreement or of an Advisory agreement; or in order to take steps at the request of the Client prior to entering into these agreements, such as assisting the Client to open a bank account to be held with a banking partner;
- Legal and regulatory obligations: collection and processing necessary to comply with the Company's AML/CFT and other regulatory obligations, or with requests from tax authorities, courts or any other legal body;
- Legitimate interests: collection and processing necessary for the Company's legitimate interests or for the legitimate interests of a third party among other things in order to manage disputes, litigations or claims in which the Company is involved, to enhance and/or optimize the Company's business and administration, to seek legal advice on the Company's rights and obligations.

Sharing of personal information

The Company may share or transfer personal information with

- Banks where Clients want to open accounts where assets managed by the Company will be held;
- Third parties servicing the Company such as internal auditor (outsourced) and external auditor;
- Competent authorities such as regulator, tax authorities, courts, within the limits set by laws and regulations.

Rights of the Clients

The Clients has the following rights:

- Obtain confirmation that the Company is processing their personal information and request a copy of the data held about them;
- Ask for update or correction of personal data held by the Company about them;
- Ask for deletion of personal data held by the Company about them, to the extent it is not in contradiction with other legal or regulatory obligations of the Company;
- Ask for restriction of processing of the personal data held by the Company about them;
- To complain to the local Data Protection Authority (the National Commission for Data Protection "CNPDP") if they disagree with the way their personal data are processed by the Company.

Holding period of personal data

The Company will keep personal information of the Client:

- As long as it is required for the performance of the contract signed between the Company and its Clients;
- As long as the Company is required to do so as per its legal and regulatory obligations (5 years retention period after end of business relation as per AML obligations);
- Until the end of any litigation or investigation in relation to the services provided by the Company to the Client.

Contact person

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