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| <b>PRIVACY POLICY</b><br><b>LM SAM</b> |
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LM SAM respects your privacy and is committed to protect your personal data. This privacy policy explains how we process your personal data when you visit our website, when you contact us directly, when we have a business relationship with you, or when you use our services. It also explains your rights and is referenced throughout our documentation and forms.

1. IMPORTANT INFORMATION AND ABOUT US
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## **1. IMPORTANT INFORMATION AND ABOUT US**

### **1.1 PURPOSE OF THIS PRIVACY POLICY**

The purpose of this privacy policy is to inform you about how LM SAM collects and processes your personal data when you provide it via this website, when you use our services, when we have a business relationship with you, or when you communicate with us in general.

You can view it at any time on our website and must read it before providing any personal data.

### **1.2 DATA CONTROLLER**

The data controller for your personal data is LM SAM, whose registered office is located at 17 avenue de la Costa – 98000 Monaco. You may contact our Data Protection Officer with any questions regarding this policy or any requests to exercise your rights by sending a letter to the company's registered office or by email to [dpo@linviagroup.com](mailto:dpo@linviagroup.com).

### **1.3 CHANGES TO THE PRIVACY POLICY AND YOUR OBLIGATION TO INFORM US OF CHANGES**

We regularly update our privacy policy to provide you with the most accurate and relevant information possible.

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

### **1.4 LINKS TO THIRD-PARTY SITES**

The LM SAM website may contain links to third-party websites, plug-ins and applications. By clicking on these links or activating these connections, you authorize third parties to collect or share data about you. We do not control these third-party websites and are not responsible for

how they process your personal data. When you leave our website, we encourage you to read the privacy policy of each website you visit.

## **2. THE DATA WE COLLECT ABOUT YOU**

Personal data refers to any information relating to a natural person that allows that person to be identified, either directly or indirectly.

We may collect, use, store and transfer various types of personal data about you, which we have categorised as follows:

1. Identity/family status (surname, first name, date of birth, etc.)
2. Addresses and contact details (postal address, email, telephone numbers, etc.)
3. Data relating to professional life (job title, nature of the role, etc.)
4. Copy of official document: identity card or passport (in particular in connection with our identity verification obligations)
5. Financial details (data relating to beneficial owners and banking history checks, etc.)
6. Electronic identification data
7. Temporal information (logs, etc.)
8. Other: content of emails, cookies, any information necessary to comply with our legal obligations.

Where we are required to collect personal data by law or under the terms of a contract we have entered into with you, and you do not provide such data when requested, we may not be able to perform the contract we have entered into or are about to enter into with you. In such cases, we will inform you that the provision of this information is mandatory.

## **3. HOW, WHY AND ON WHAT BASIS IS YOUR PERSONAL DATA COLLECTED?**

### **3.1 HOW WE COLLECT YOUR DATA**

We mainly collect your personal data directly from you by sending you forms to complete or by making specific requests. We may also request and/or receive personal data from third parties or agents whom you have appointed in connection with the contracts binding us.

Furthermore, you may voluntarily provide us with personal data if you request specific information from us or in the context of our contractual relationship. In such cases, you must not send us personal data via an unsecured means of communication (instant messaging, email).

### **3.2 PURPOSES FOR WHICH WE PROCESS YOUR PERSONAL DATA**

The processing we carry out on your personal data serves explicit and specific purposes:

- Recruitment management (responding to unsolicited applications, job interviews)
- Email management (email correspondence)
- Website and cookie management

- Management of customer and prospect files (management of your customer file and monitoring of our business relationship)
- Management of supplier files
- Management of trusts and companies (provision of services related to the corporate purpose, retention of information necessary for our assignments)
- Client administration
- Accounting and invoicing management (ensuring payment for services and carrying out financial transactions on your behalf)
- Management of anti-money laundering obligations
- Management of legal obligations relating to the automatic exchange of information for tax purposes

Please note that we may process your personal data on the basis of several legal grounds, depending on the specific purpose for which we use your data.

### 3.3 THE LEGAL BASES ON WHICH WE COLLECT YOUR DATA

We process your data for the purposes detailed above and on the basis of several legal grounds:

- Our legal obligations (accounting and invoicing management, management of anti-money laundering obligations, management of legal obligations relating to the automatic exchange of information for tax purposes)
- The performance of contractual or pre-contractual measures (management of client and supplier records, management of trusts and companies)
- Our legitimate interest, particularly in the context of email management. Indeed, without processing your personal data, we will be unable to respond to your enquiries
- Your consent regarding cookies placed on our website. You can configure your browser to refuse all or some cookies, or to notify you when websites install or access cookies. If you disable or refuse cookies, please note that certain parts of this website may become inaccessible or may not function correctly. For more information on managing cookies, please refer to the APDP's guidance by clicking on the following link: <https://apdp.mc/apdp/fiches-pratiques/internet-et-reseaux-sociaux/fiche-memo-les-cookies/>

## 4. TRANSFER OF YOUR PERSONAL DATA

We may share your personal data with:

- Our internal staff who need to know your information as part of our contractual relationship or to respond to your requests;
- External third parties representing you or with whom we need to interact to fulfil our contractual obligations to you;
- Any external third party, competent authority, auditor or court to whom disclosure is necessary to comply with a legal obligation.

In general, we only disclose your information to identified and specific third parties in your interest or for a legal or judicial reason, in accordance with the applicable confidentiality and security rules.

We do not authorize our third-party service providers to use your personal data for their own purposes and only allow them to process your personal data for specific purposes and in accordance with our instructions.

## 5. INTERNATIONAL TRANSFERS

When transmitting or collecting your data, we give priority to data exchanges within the Principality of Monaco or within the European Union.

In an international context, we may need to collect or transfer personal data outside the European Union in order to fulfil our contractual obligations to you. In such cases, these transfers will be accompanied by all necessary safeguards and security measures.

## 6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised, altered or disclosed manner.

Furthermore, we restrict access to your personal data to employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and are subject to a duty of confidentiality.

We have put procedures in place to deal with any suspected personal data breaches and will notify you of any data breaches that may occur.

## 7. DATA RETENTION

### HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

We will only retain your personal data for as long as is reasonably necessary to fulfil the purposes for which we collected it, including to comply with any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a claim or if we reasonably believe there is a risk of litigation concerning our relationship with you.

For example, CVs submitted where the application was unsuccessful are retained for one year from the date of receipt.

To determine the appropriate retention period for personal data, we take into account the amount, nature and sensitivity of the personal data, the potential risk of harm resulting from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and the possibility of achieving those purposes by other means, as well as any applicable legal, regulatory, tax, accounting or other requirements.

## 8. YOUR RIGHTS

Depending on the nature of the processing carried out, you have rights under the applicable data protection legislation.

You may therefore:

- Request access to your personal data and a copy thereof. This right of access is indirect where it relates to our anti-money laundering obligations.
- Request the rectification of your personal data.
- Request the erasure of your personal data.
- Object to the processing of your personal data.
- Request the restriction of the processing of your personal data.
- Exercise your right to human oversight and not to be subject to a decision based solely on automated processing.
- Request to withdraw your consent
- Lodge a complaint with the Monegasque Data Protection Authority (APDP).

If you wish to exercise any of the rights set out above, you may contact the Data Protection Officer by post at LM SAM, 17 avenue de la Costa – 98000 Monaco, in person or by email at: [dpo@linviagroup.com](mailto:dpo@linviagroup.com) . If there is any doubt regarding your identity, proof of identity may be requested.