

LUXEMBOURG FINANCIAL STRUCTURE

# Privacy Policy

Carrera Finance SA

AS OF JANUARY 2025

## § 1 Controller

The controller within the meaning of Regulation (EU) 2016/679 (General Data Protection Regulation — GDPR) is:

<b>Company</b>	Carrera Finance SA
<b>Legal Form</b>	Société Anonyme (AG) — Special Purpose Vehicle (SPV)
<b>RCS Luxembourg</b>	B175289
<b>LEI</b>	52990025NF4XF55YSG18
<b>EUID</b>	LURCSL.B175289
<b>Registered Address</b>	22 Boulevard Royal, L-2449 Luxembourg
<b>E-Mail</b>	official@carrera-finance.com
<b>Website</b>	www.carrera-finance.com

## § 2 Legal Bases for Processing

The processing of your personal data is based on the following legal grounds:

- **Art. 6(1)(b) GDPR:** Performance of the contractual relationship and pre-contractual measures.
- **Art. 6(1)(c) GDPR:** Fulfilment of legal obligations, in particular:
  - Anti-money laundering obligations pursuant to Directive (EU) 2015/849 and the Luxembourg AML Act
  - Know-Your-Customer requirements (KYC) pursuant to CSSF circulars
  - Tax reporting obligations pursuant to the Common Reporting Standard (CRS) and FATCA
  - Record-keeping obligations pursuant to Luxembourg commercial and tax law
- **Art. 6(1)(f) GDPR:** Legitimate interests (IT security, fraud prevention).
- **Art. 6(1)(a) GDPR:** Consent (marketing communications, cookies).

## § 3 Collection of Personal Data

We collect and process the following categories of personal data:

- **Identification Data:** First and last name, date of birth, nationality, document number, tax identification number.
- **Contact Data:** E-mail address, telephone number, residential address.
- **Financial Data:** Bank details (IBAN, BIC), account balances, transaction history, tax data.

- **KYC/AML Data:** Source of funds, employment status, PEP status, risk assessment.
- **Technical Data:** IP address, browser type, access times, device information.
- **Wallet Data:** Cryptocurrency wallet addresses (stored in encrypted form).

#### § 4 Data Security (Technical and Organisational Measures)

Pursuant to Art. 32 GDPR, we implement the following technical and organisational measures:

- **Encryption:** AES-256 encryption of all sensitive data in the database, including e-mail addresses and financial data.
- **Transport Encryption:** SSL/TLS encryption (TLS 1.3) of all data transfers.
- **Hashing:** Irreversible hashing for passwords (bcrypt) and e-mail lookups (SHA-256).
- **Access Control:** Role-based access concept with logging of all data accesses.
- **Security Audits:** Regular internal security reviews and penetration tests.
- **Data Backup:** Encrypted backups with geographical redundancy within the EU.

#### § 5 Disclosure to Third Parties and Data Processing Agreements

Your data is disclosed to third parties only in the following cases:

- To our asset initiator (ING-DiBa AG) in the context of portfolio management, on the basis of a data processing agreement pursuant to Art. 28 GDPR.
- To authorities when required by law (AML reporting obligations to CRF Luxembourg, tax disclosures pursuant to CRS/FATCA).
- To technical service providers acting on behalf of the Company (data processors pursuant to Art. 28 GDPR).

As a matter of principle, no transfer to third countries outside the EU/EEA takes place. Should such a transfer exceptionally be required, it shall only be made on the basis of Standard Contractual Clauses (SCCs) pursuant to Art. 46(2)(c) GDPR.

#### § 6 Retention Periods and Deletion

Personal data is deleted in accordance with the following periods:

Category	Retention Period	Legal Basis
<b>KYC/AML Data</b>	5 years after end of business relationship	Art. 40, Directive (EU) 2015/849
<b>Transaction Data</b>	10 years	Luxembourg Commercial Code

<b>Tax-Relevant Data</b>	10 years	Luxembourg Tax Code
<b>Communication Data</b>	3 years after last contact	Unless statutory retention obligation applies
<b>Technical Log Data</b>	90 days	Legitimate interests (IT security)

## § 7 Your Rights as a Data Subject

Pursuant to Chapter III of the GDPR, you have the following rights:

- **Right of Access** (Art. 15 GDPR) — right to confirmation of processing and access to your data.
- **Right to Rectification** (Art. 16 GDPR) — correction of inaccurate or incomplete data.
- **Right to Erasure** (Art. 17 GDPR) — subject to statutory retention obligations.
- **Right to Restriction of Processing** (Art. 18 GDPR).
- **Right to Data Portability** (Art. 20 GDPR) — in a structured, commonly used format.
- **Right to Object** (Art. 21 GDPR) — against processing based on legitimate interests.
- **Right to Withdraw Consent** (Art. 7(3) GDPR).

To exercise your rights, please contact: [official@carrera-finance.com](mailto:official@carrera-finance.com)

## § 8 Automated Decision-Making and Profiling

The Company uses automated procedures for risk assessment within the scope of AML/KYC compliance. These procedures serve to classify the client risk profile and for transaction monitoring. No automated individual decision-making within the meaning of Art. 22 GDPR takes place — all risk-relevant decisions are reviewed by qualified personnel.

## § 9 Data Breaches

In the event of a personal data breach pursuant to Art. 33 GDPR, the Company shall notify the incident to the *Commission Nationale pour la Protection des Données* (CNPD) within 72 hours. Data subjects shall be informed without undue delay pursuant to Art. 34 GDPR where a high risk to their rights and freedoms exists.

## § 10 Competent Supervisory Authority

You have the right to lodge a complaint with the competent data protection authority:

<b>Authority</b>	Commission Nationale pour la Protection des Données (CNPD)
<b>Address</b>	15, Boulevard du Jazz, L-4370 Belvaux, Luxembourg
<b>Telephone</b>	+352 26 10 60-1

<b>Website</b>	<a href="http://www.cnpd.lu">www.cnpd.lu</a>
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<b>WEBSITE</b>	<b><a href="http://www.carrera-finance.com">www.carrera-finance.com</a></b>
<b>VERSION</b>	<b>As of January 2025</b>