

Privacy Notice

Who We Are

Fiduserve Asset Management Ltd ('we' or 'us' or 'our') gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Fiduserve Asset Management Ltd's registered office is at **9 Kafkasou Street, Aglantzia 2112, Nicosia, Cyprus** and we are a company registered in The Republic of Cyprus under company number **HE 378129**. We act as the **data controller** when processing your data. Our designated Appointed Person is Mrs. Xenia Kyrri, who can be contacted at:

9 Kafkasou Street
Aglantzia, 2112
Nicosia,
Cyprus
Tel: +357 22 769409
Email: admin@fiduserve.com

Information That We Collect

Fiduserve Asset Management Ltd processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. 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 notice.

The personal data that we collect from you is: -

- Name
- Date of Birth
- Gender
- Marital Status
- Specimen Signature
- Home Address
- Personal Email
- Business Email
- Home Telephone Number
- Mobile Telephone Number
- Company Name
- Passport Number/ID Number
- Source of Wealth

- Size of Wealth
- Source of Funds

We do not process Sensitive Personal Data including details on religion, sexual orientation, political opinions, etc.

We collect information in the below ways: -

In the provision of our services, Personal Data may be collected directly from the data subjects, persons acting on the data subject's behalf and from publicly available sources such as World Check, OFAC Sanctions List Search engine, UN Sanctions List, EU Sanctions List. Information may be collected in the below ways:

- Certified as true copy of the original in hard copy form
- Soft copy documents directly from the client or authorized representative
- CVs
- Bank statements
- Reference letters
- Details about payments to and from data subjects
- Online searches (World Check, OFAC Sanctions List, UN Sanctions List, EU Sanctions List)

How We Use Your Personal Data

Fiduserve Asset Management Ltd takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice.

The personal data obtained may be used by the controller in order to comply with the requirements of the CySEC Law 87(I)/2017 in order to be able to perform its duties as follows:

- a. Construct an economic profile for each client;
- b. Perform appropriateness and suitability tests;
- c. Provision of personal data to custodian/broker on a regularly updated basis;
- d. To comply with the requirements on due diligence as per the Prevention and Suppression of Money Laundering and Terrorist Financing Laws of 2007 – 2019;
- e. To perform our contractual obligations / provide a service which our Company has been engaged to carry out, e.g. asset management, investment advice, etc.;
- f. To comply with all legal and regulatory obligations we are subject to, including those required from time to time under the laws of the Republic of Cyprus, the European Union and other applicable laws, regulations and directives and obligatory guidelines set by our Supervisory Authority;
- g. To perform a task carried out in the public interest;
- h. To manage our relationship with the data subject;
- i. On the basis of any other legitimate interest (including our legitimate interest and / or those of a third party).

Your Rights

You have the right to access any personal information that **Fiduserve Asset Management Ltd** processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data by completing and submitting the **Right to Erasure Request Form** found on our [website](#) or to restrict processing (*where applicable*) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

We use an automated decision-making software called Moebius in order to be able to classify you in accordance with the provisions of the Prevention and Suppression of Money Laundering and Terrorist Financing Laws of 2007 – 2019 Law into either the Low, Medium or High Risk category based on the information we have collected.

Under the General Data Protection Regulation, you are entitled as a data subject to obtain from the Company, confirmation as to whether we are processing personal data concerning you, as well as to request details about the purposes, categories and disclosure of such data. More details may be found in our **Subject Access Request Procedures** which have been sent to you. You can further use our **Subject Access Request (SAR) Form** to request information about, and access to any personal data we hold about you. This may be found on our [website](#).

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 notice or where there is a legal requirement. **Fiduserve Asset Management Ltd** uses **third-parties** to provide the below services and 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.

Fiduserve Management Ltd

We have outsourced the accounting function to Fiduserve Management Ltd. They do our bookkeeping, tax returns, payrolls, invoicing, etc. The only information we provide them with is your name and address in order for them to be able to issue invoices for the services provided.

For more information about Fiduserve Management Ltd, please read their Privacy Notice at <https://fiduserve.com/fiduserve-privacy-statement/>

K. Treppides & Co Ltd

We have outsourced the internal audit function to K. Treppides & Co Ltd. They will be responsible for conducting the internal audit of the Company. They will only have view access to your information during reviews on a sample basis in order to be able to carry out their duties.

Treppides Fund Services Ltd

We have outsourced the fund administration function to Treppides Fund Services Ltd. They will be responsible for the administration of AIF funds under management and will have access to all personal data collected as they also have a responsibility, in accordance with the Prevention and Suppression of Money Laundering and Terrorist Financing Laws of 2007 – 2019 Law, to hold such data since the AIF Fund will separately have an agreement with Treppides Fund Services Ltd in order to provide the requested services.

Safeguarding Measures

Fiduserve Asset Management Ltd 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 unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including: -

- pseudonymisation;
- restricted access;
- IT authentication;
- firewalls;
- anti-virus/malware

Transfers Outside the EU

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data. **Fiduserve Asset Management Ltd** does not transfer or store any personal data outside the EU.

Consequences of Not Providing Your Data

You are not obligated to provide your personal information to **Fiduserve Asset Management Ltd**, however, as this information is required for us to provide you with our services, we will not be able to offer some/all our services without it.

How Long We Keep Your Data

Fiduserve Asset Management Ltd 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. We are required under the Prevention and Suppression of Money Laundering and Terrorist Financing Laws of 2007 – 2019 Law to keep your basic personal data (*name, address, contact details*) for a minimum of 5 years after the termination of the business relationship after which time it will be destroyed.

Lodging a Complaint

Fiduserve Asset Management Ltd only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Fiduserve Asset Management Ltd

Mrs. Xenia Kyrri
Kafkasou 9,
Aglantzia 2112,
Nicosia, Cyprus
Tel: +357 22 769 409
Email: admin@fiduserve.com

Office of the Commissioner for Personal Data Protection

Iasonos 1,
1082 Nicosia
Cyprus
Tel: +357 22 818 456
Email: commissioner@dataprotection.gov.cy

Review of the Privacy Notice

We may update this Privacy Notice from time to time to respond to updates in legal, technical or business requirements and developments. We will take appropriate measures to inform you of any changes implemented. Nonetheless, you may always find the latest version of the Privacy Notice on our [website](#).