

LAST UPDATED: 11 December 2020

Privacy Notice

This Privacy Notice explains how Lumyna Investments Ltd. (“**Lumyna**”) processes personal data relating to employees, consultants, contractors and sub-contractors of Lumyna and other affiliates and subsidiaries of Assicurazioni Generali (together, the “**Generali Group**”) as a controller for the purposes of data protection laws, including the General Data Protection Regulation 2016/679 and the Data Protection Act 2018.

We refer to the individuals whose Personal Data (as defined below) we process as a controller as “you” in this Privacy Notice.

This Privacy Notice does not explain how Lumyna processes personal data of investors or prospective investors in Lumyna Funds (or their representatives), directors of Lumyna Funds, directors or employees of Generali Investments Luxembourg S.A. as the management company of Lumyna Funds (the “**Management Company**”), or representatives of trading counterparties or other service providers to Lumyna Funds. Lumyna processes these categories of personal data as a processor on behalf of Lumyna Funds and the Management Company. Please refer to the privacy notice of Lumyna Funds and the Management Company at www.lumyna.com for more information about these processing activities.

In this Privacy Notice, “**Personal Data**” is any information that identifies an individual or relates to an identifiable individual, including:

- Name
- Postal address
- Telephone or fax number
- Email address and other identifying addresses for electronic communications
- Date and place of birth
- Nationality and other details from passports and other government or state issued forms of personal identification (including nationality, social security, driver’s license, national insurance and other identifying numbers)
- Education and qualification details
- Bank account details for transfer of salary and other benefits
- Pay, benefits, stock options, shareholdings, and pension information
- Tax identification details
- Photographic or video images
- Telephonic or electronic recordings
- Signatures
- Performance evaluations and service history
- Health information, pregnancy and/or disability status

- Details of next of kin, including contact information

Collection of Personal Data

We and our agents and service providers collect Personal Data in a variety of ways, including:

- Through the recruitment / engagement process and your completion of related forms
- In the course of your employment or service contract
- Through exit interviews with departing employees
- Through your use of our email and other IT systems
- From other sources, such as public databases, previous employers, and other third parties.

Uses of Personal Data

We and our agents and service providers may process Personal Data in the following ways and for the following purposes:

- to meet our legal obligations as an employer and perform our obligations and exercise our rights under your contract of employment with us. For example, we use your personal data to pay you, to evaluate your individual performance, and provide benefits in connection with your employment;
- to comply with laws and regulations (including any legal or regulatory guidance, codes or opinions), and to comply with other legal process and law enforcement requirements (including any internal policy based on or reflecting legal or regulatory guidance, codes or opinions);
- we will use the private contact details relating to you and your next of kin (and that you have provided to us for emergency purposes) only in connection with an emergency;
- we will process personal data related to your use of our email system in order to enable the effective operation of the email system and ensure that it is used in accordance with our policies and procedures;
- the prevention and detection of crime or fraud.

We are entitled to use your personal data in these ways because that use is necessary:

- for us to perform our obligations and exercise our rights in connection with your employment contract or other agreement with the Generali Group;
- to perform our contractual obligations with our third-party providers such as health insurance providers;
- for the purposes of occupational health and for us to take decisions regarding your fitness for work;
- for us to comply with our legal and regulatory obligations;
- for us to establish, exercise or defend our legal rights or for the purpose of legal proceedings; or

- for our legitimate business interests (or the legitimate interests of one or more of our affiliates), such as to:
 - allow us to effectively and efficiently administer and manage the operation of our business;
 - ensure a consistent approach to the management of the employees and staff of the Generali Group;
 - maintain compliance with internal policies and procedures; or
 - be able to contact you or your family in the event of an emergency.

Special Categories of Personal Data

Certain forms of “special categories of personal data” are subject to specific protection or restriction by law in certain territories, including the UK. For these purposes, special categories of personal data are data relating to: racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic data; biometric data; data concerning health; or data concerning sex life or sexual orientation. Criminal offence data does not fall under these special categories but is still afforded special protection under data protection laws.

We will only process your special categories of personal data or criminal offence data if permitted by law and only if one of the following conditions is met:

- you have given explicit consent in writing to the processing of the data;
- the processing is necessary for carrying out our obligations and specific rights in the field of employment law, social security or social protection law (including obligations in relation to health and safety and disability discrimination, occupational health, sickness absence, maternity leave, family emergency leave, paternity leave, parental leave, the legality of personnel working in a particular jurisdiction, which will involve processing data in relation to nationality, work permits and visas, monitoring equality of treatment of staff, in connection with benefits including life assurance benefit, permanent health insurance, private medical insurance or pension, disciplinary action and vetting (where necessary));
- the processing is necessary to protect your health or safety in an emergency (or that of another person) where you are physically or legally incapable of giving consent;
- the data in question has been made public by you;
- the processing is necessary for the purpose of, or in connection with, any actual or prospective legal proceedings, for the purpose of obtaining legal advice or otherwise for the purposes of establishing, exercising or defending legal rights subject to applicable local legislation or where courts are acting in their judicial capacity;
- the processing is necessary for reasons of substantial public interest on the basis of local law which is proportionate to the aim pursued and which contains appropriate safeguarding measures;
- the processing is necessary for preventative or occupational medicine;
- the processing is necessary for the prevention or detection of crime or acts of dishonesty, malpractice or other improper conduct;

- the processing is necessary for archiving purposes in the public interest or scientific and historical research purposes or statistical purposes; or
- the processing is otherwise permitted by law.

In each case we will meet any additional local legal requirements and enforce any applicable duties of confidentiality vigorously, for example in relation to access to health records.

Disclosure of Personal Data

We may disclose your personal data to other members of the Generali Group for the purposes of:

- the management and administration of our business and our affiliates' business;
- complying with the functions that each of them may perform relating to regional or global HR decisions;
- benchmarking employee salaries and benefits with similar organisations;
- assessing compliance with applicable laws, rules and regulations, and internal policies and procedures across our business and our affiliates' businesses;
- where your personal data are held as part of an internal directory, enabling adequate communication with you for the performance of employment duties or for emergency reasons;
- performing contractual obligations with third parties; and
- the administration and maintenance of the databases storing personal data relating to our employees or to employees of our affiliates.

Keeping Personal Data secure is one of our most important responsibilities. We maintain physical, technical, electronic, procedural and organisational safeguards and security measures to protect personal data against accidental, unlawful, or unauthorised destruction, loss, alteration, disclosure, or access, whether it is processed by us in the UK or elsewhere. Appropriate employees are authorised to access personal data for legitimate and specified business purposes. Our employees are bound by a code of ethics and other internal policies that require confidential treatment of personal data and are subject to disciplinary action if they fail to follow such requirements.

We may also share your Personal Data with third parties outside of the Generali Group for the following purposes:

- to third party agents, delegates and contractors for the purposes of providing services to us, including cyber security and other IT service providers, emergency contact service providers, HR consultants and software providers, external legal counsel, notaries, auditors and tax advisers;
- in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings);
- to the extent required by law, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation, establish, exercise or defend our legal rights.

Where we use service providers who process your Personal Data on our behalf as processors, we ensure they do so in accordance with our instructions and that they put appropriate technical and organizational security measures in place to adequately protect your personal data. Where we share your personal data with our service providers (e.g. external legal counsel), we may allow them to process it as controllers under their privacy notices solely for the purposes of providing their services to us, complying with their own legal and regulatory obligations or pursuing their legitimate interests as described in this Privacy Notice, but strictly in connection with the provision of their services to us and in accordance with applicable laws.

How individuals can access, change or suppress their Personal Data

You have a number of legal rights in relation to the Personal Data we hold about you. These rights include:

- the right to obtain information regarding the processing of your Personal Data and access to the Personal Data which we hold about you;
- the right to withdraw your consent to our processing of your Personal Data at any time. Please note, however, that we may still be entitled to process your Personal Data if we have another legitimate reason (other than consent) for doing so;
- in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us;
- the right to request that we rectify your personal data if it is inaccurate or incomplete;
- the right to request that we erase your personal data in certain circumstances. However, please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it;
- the right to object to, and the right to request that we restrict, our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally entitled to continue processing your personal data and / or to refuse that request; and
- the right to lodge a complaint with the data protection regulator if you think that any of your rights have been infringed by us.

If you would like to exercise any of your rights, the section headed “Contacting Us” below. We will respond to your request consistent with applicable law. For your protection, we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes. There may also be residual information that will remain within our databases and other records, which will not be removed.

Retention Period

We will retain Personal Data for as long as needed or permitted in light of the purpose(s) for which it was obtained. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you; (ii) whether there is a legal obligation to which we are subject; and (iii) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

Transfers of Personal Data outside the UK or the EEA

Personal Data may be stored and processed in any country where we or other members of the Generali Group have facilities or in which we engage service providers. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access Personal Data.

If you are located in the United Kingdom or the European Economic Area (EEA): Some non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available at http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.html). For transfers from the UK or the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to protect Personal Data. Transfers may also be made pursuant to contracts in your interest or at your request.

You can obtain more details about the protection given to your Personal Data when it is transferred outside the UK or the EEA by contacting us in accordance with the section headed "Contacting Us" below.

Recording of Communications

When individuals communicate with us or use our IT systems, to the extent permitted or required by applicable law, telephone conversations and electronic communications, including emails, text messages and instant messages, may be recorded and/or monitored for evidentiary, compliance, quality assurance and governance purposes.

Updates to this Privacy Notice

We may change this Privacy Notice from time to time. The "*Last Updated*" legend at the top of this Privacy Notice indicates when this Privacy Notice was last revised. Any changes will become effective when we post the revised Privacy Notice. You may also request the most recent version of this Privacy Notice in accordance with the section headed "Contacting Us" below.

Contacting Us

Lumyna is the company responsible for the processing (in particular collection, use and disclosure) of your Personal Data under this Privacy Notice.

If you have any questions about this Privacy Notice, please contact us at info@lumyna.com.

To help us to manage your query, please include your full name.