

Version 2.03

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Validated by the Board of Directors

DATA PROTECTION POLICY

Pure Capital S.A. pays the utmost attention to the protection of your personal data.. We will only use your personal information to deliver the investment/fund services you have requested from us, and to meet our legal responsibilities.

We process information and personal data relating to you and/or any related person of yours (Related Person(s) and you, together the hereinafter "Data Subject(s)"). In substance, we do so in connection with our existing and/or prospective business relationships, including your use of our website (together hereinafter the "Business Relationship").

We can do so either as controller or as joint controller.

A "Related Person" means an individual or entity whose information you or a third party provides to us and/or which otherwise comes to our knowledge in connection with our Business Relationship. A Related Person may include, but is not limited to, (i) any director, officer or employee of a company, (ii) a trustee, settlor or protector of a trust, (iii) any nominee or beneficial owner of an account, (iv) a substantial interest owner in an account, (v) a controlling person.

How do we collect information from you?

We obtain information about you when you engage us to deliver our investment/fund services and/or when you use our website, for example, when you contact us about our products and/or services.

What type of information do we collect from you?

The personal information we collect from you will vary depending on which products and/or services you engage us to deliver. The personal information we collect might include your name, address, telephone number, email address, professional details, financial information,, details related transactions/investments (such as risk profiles), your tax identification, your national insurance number, bank account details, your IP address, which pages you may have visited on our website and when you accessed them.

How and why is your information used?

We essentially base our processing of data on (i) the performance of a contract to which you are a party or a Related Person is related (as well as to take pre-contractual steps at your or a Related Person's request), (ii) our obligation to comply with a legal or regulatory obligation, (iii) the pursuit of our legitimate interest and (iv) the performance of a task carried out in the public interest (e.g., to prevent or detect offences).

In general terms, and depending on which products and/or services you engage us to deliver, as part of providing our agreed services we may use your information to:

- contact you by post, email or telephone
- verify your identity where this is required
- understand your needs and how they may be met
- maintain our records in accordance with applicable legal and regulatory obligations
- process discretionary portfolio, investment advisory and execution only services
- process investment management, administration and distribution of investment funds and all related services to it
- process subscriptions, conversions and redemptions in investment funds

- prevent and detect crime, fraud or corruption and the provision of financial and other services to persons subject to economic or trade sanctions on an on-going basis in accordance with our AML-CTF procedures, as well as to retain AML-CTF and other required records for screening purposes;
- carry out any other form of cooperation with, or reporting to, competent administrations, supervising authorities, law enforcement authorities and other public authorities (e.g., in the field of anti-money laundering and combatting terrorism financing ("AML-CTF"))

As a matter of principle, we retain personal data for as long as we need during the business relationship or to achieve other purposes of the investment/fund services we are providing or if imposed by applicable legislation. By the same token, we will delete or anonymize personal data (or equivalent) once they are no longer necessary, subject however (i) to any applicable legal or regulatory requirements to store personal data for a longer period, or (ii) to establish, exercise and/or defend actual or potential legal claims, investigations or similar proceedings, including legal holds, which we may enforce to preserve relevant information.

Who has access to your information?

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

Any staff with access to your information have a duty of confidentiality under the ethical standards that Pure Capital S.A. is required to follow.

Third Party Service Providers working on our behalf

We may pass your information to our third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf.

However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

Please be assured that we will not release your information to third parties unless you have requested that we do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention and detection of crime, fraud or corruption.

How you can access and update your information

Keeping your information up to date and accurate is important to us. We commit to regularly review and correct where necessary, the information that we hold about you. If any of your information changes, please email or write to our Data Protection Officer:

Mr Rudy Hoylaerts

Email: rhoylaerts@purecapital.eu

2, rue d'Arlon

L-8399 Windhof

You have the right to ask for a copy of the information that Pure Capital S.A. holds about you.

Security precautions in place to protect the loss, misuse or alteration of your information

Whilst we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk.

Your data will usually be processed in our offices in Luxembourg. We take the security of your data seriously and so all our systems have appropriate security in place that complies with all applicable legislative and regulatory requirements.

In case of breach, fraud or cyber-attack, point VII of the IT Procedure of Pure Capital S.A. lists the steps that have to be followed. All the employees of Pure Capital S.A. have been informed of this process.

Your choices

We may occasionally contact you by post / email / telephone with details of any changes in legal and regulatory requirements or other developments that may be relevant to your affairs and, where applicable, how we may assist you further. If you do not wish to receive such information from us, please let us know by contacting our Data Protection Officer .

Your rights

Access to your information: You have the right to request a copy of the personal information about you that we hold.

Correcting your information: We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

Deletion of your information: You have the right to ask us to delete personal information about you when:

- you consider that we no longer require the information for the purposes for which it was obtained
- you have validly objected to our use of your personal information - see 'Objecting to how we may use your information' below
- our use of your personal information is contrary to law or our other legal obligations
- we are using your information with your consent and you have withdrawn your consent - see 'withdrawing consent to use your information' below.

Restricting how we may use your information: In some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where there is no longer a basis for using your personal information but you do not want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

Objecting to how we may use your information: Where we use your personal information to perform tasks carried out in the public interest then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

Withdrawing consent to use your information: Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given which will disable us to provide the investment/fund services any longer.

Please contact our Data Protection Officer if you wish to exercise any of these rights.

[Changes to our privacy notice](#)

We keep this privacy notice under regular review and will place any updates www.purecapital.eu

Paper copies of the privacy notice may also be obtained from our Data Protection Officer.

This privacy notice was last reviewed on December 15th, 2025.

[Contact information](#)

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