Arena Wealth Management S.A. – Privacy policy

Effective date

This Privacy Policy is effective as of September 2026 and replaces any previous Privacy Policy or equivalent that was in application before the Effective date.

Legal background

Arena Wealth Management S.A. (hereafter referred as "the Company" or "AWM") is a "société anonyme" registered with the Luxembourg Register of Commerce under the number B 144.237 with registered office at 31 Grand-rue, L-1661 Luxembourg.

The Company is a Professional of the Financial Sector, duly authorized to act, under supervision of the Commission de Surveillance du Secteur Financier (the CSSF), as an investment adviser, a broker in financial instruments, a commission agent, and a private portfolio manager within the scope of the Law of 5 April 1993 on the financial sector, as amended (the "Law on the Financial Sector").

The current data protection legislation includes Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation, or "GDPR") which entered into force on May 25, 2018; as well as any other national or supranational applicable law.

The Company collects and processes personal information relating to all natural persons being Clients, prospects, or related counterparties (the "Data Subjects") and is therefore acting as Data Controller as per the GDPR.

In addition to its role as Data Controller described above, the Company also grants certain third parties ("third party"), sub-licensed access to its portfolio management system for such third party to manage the portfolios of their own underlying clients. In that specific context, the Company processes the personal data of the third party's underlying clients strictly on behalf of, and under the instructions of, the relevant third party, and accordingly acts as a Data Processor within the meaning of the GDPR, and not as Data Controller, in respect of that data. Such processing is governed by a dedicated data processing agreement entered with the relevant third party. Any data subject wishing to exercise their rights in relation to personal data processed by the Company in this capacity should address their request to the relevant third party, who remains the Data Controller for that data and who will, where necessary, involve the Company in responding to such requests.

Categories of personal information collected:

- personal information such as your name, identification number, date of birth, compliance related documents (including a copy of your national identity card or passport), phone number, address and domicile, electronic address, and family details such as the name of your spouse or partner; tax domicile and other tax-related documents; financial information, including payment and transaction records and information relating to your assets, financial statements, liabilities, taxes, revenues, earnings and investments (including your investment objectives; Investment risk profile/strategy); and information; your knowledge of and experience in investment matters;
- professional information where relevant, such as your job title and work experience; details of your nomination for a mandate;
- in some cases: highly sensitive data like information relating to criminal convictions or offences (to the extend legally possible).

Purposes of collection and processing of personal information:

We process Personal Data, within applicable legal limitations, for the following purposes:

Onboarding	Legal obligations and contractual necessity
Business relationship management	Legal obligations and contractual necessity
Product implementation and execution of transactions	Legal obligations and contractual necessity
Regulatory AML/CFT compliance; MiFID regulations and any other applicable regulations, laws… to which AWM is subject	Legal obligations

Security purposes	legal obligations and legitimate interest (provided this interest is balanced against the data subject's rights and freedoms)

Sharing of personal information

The Company may share or transfer personal information with

- Banks (bank account opening process where assets managed by the Company will be held, invoicing and transactional purposes);
- Third parties servicing the Company such as internal auditor (outsourced) and external auditor;
- Competent authorities such as regulator, tax authorities, courts, within the limits set by laws and regulations.
- IT and software service providers supporting the Company's wealth management system, including its software provider and the subcontractors it uses to deliver related support and portfolio reconciliation services.

Certain of these IT service providers are located outside the European Economic Area, including in Switzerland and Singapore. Where this is the case, the Company ensures that such transfers are subject to an adequacy decision of the European Commission or, in the absence of such a decision, to appropriate safeguards such as the European Commission's Standard Contractual Clauses.

Rights of the Clients

The Clients has the following rights:

- Obtain confirmation that the Company is processing their personal information and request a copy of the data held about them;
- Ask for update or correction of personal data held by the Company about them;
- Ask for deletion of personal data held by the Company about them, to the extent it is not in contradiction with other legal or regulatory obligations of the Company;
- Ask for restriction of processing of the personal data held by the Company about them;
- To complain to the local Data Protection Authority (the National Commission for Data Protection "CNPD") if they disagree with the way their personal data are processed by the Company.

Holding period of personal data

The Company will keep personal information of the Client:

- As long as it is required for the performance of the contract signed between the Company and its Clients (e.g. minimum of 10 years);
- As long as the Company is required to do so as per its legal and regulatory obligations (e.g.: 5 years retention period after end of business relation as per AML obligations…);
- Until the end of any litigation or investigation in relation to the services provided by the Company to the Client.

Contacts:

The person responsible for the data protection within the Company is:
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Arena Wealth Management S.A.
31 Grand-rue
L-1661 Luxembourg
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e-mail: arnar@awm.lu

In Luxembourg, the relevant data protection authority is:
The CNPD « *Commission Nationale pour la Protection des Données* »
15 Boulevard du Jazz
L-4370 Belvaux
phone: +352 2610 60 1,
e-mail: info@cnpd.lu

ARENA WEALTH MANAGEMENT S.A.