

# AULIEN S.C.A., SICAV-SIF

## Privacy Policy

AULIEN S.C.A., SICAV-SIF (“we”, “us”, “our”) is an investment company regulated by the Luxembourg Financial Authority (CSSF), together with its General Partner, AULIEN PARTNERS S.à r.l., located at 1, Rue Bender, L-1229 Luxembourg.

We are fully committed to protecting your personal data and processing it in compliance with applicable data protection laws, including the General Data Protection Regulation (“GDPR”) (EU) 2016/679.

### 1. Purpose and Scope

This Privacy Policy explains how and why we collect and process your personal data. We process personal data only for legitimate purposes and only to the extent necessary to achieve those purposes.

It also outlines your rights as an individual under data protection law, how long we retain your data, and how you can contact us.

### 2. Personal Data Collected and Processed

Depending on the services we provide to you or receive from you, we may collect and process the following categories of personal data:

- Personal details: name, identification number, date and place of birth, KYC documents (such as a copy of your ID or passport), phone number, postal and electronic addresses, and, where relevant, family information.
- Financial information: payment and transaction records, asset details, financial statements, liabilities, taxes, revenues, and investment objectives.
- Tax-related information: tax domicile and data required under FATCA or CRS.
- Professional data: job title, employer, work experience, and investment knowledge.
- Signatures and mandates: information relating to representation or account authorization.
- Sensitive data (when legally required): political exposure or criminal records, processed solely to comply with anti-money-laundering and tax laws.

### 3. Legal Basis for Processing

We process your personal data on one or more of the following lawful bases:

- Compliance with legal or regulatory obligations (e.g., AML, tax laws, CSSF regulations);
- Performance of a contract or taking steps prior to entering into one;
- Our legitimate interests, such as improving our services, managing IT systems, and preventing fraud or data breaches;
- Your explicit consent (e.g., for receiving marketing communications);
- Compliance with professional standards and industry rules.

### 4. Purpose of Processing

We process your personal data to:

- Onboard shareholders, investors, or clients and verify their identity in compliance with legal obligations;
- Execute investments, redemptions, and payments, and maintain accurate records of transactions;
- Fulfil our ongoing regulatory duties, including AML and tax reporting to authorities;
- Manage our business operations, IT infrastructure, and communications with service providers;
- Conduct compliance monitoring, audits, and risk management;
- Provide marketing information, when legally permitted and subject to your consent.

### 5. Sharing of Personal Data

We may share your personal data with trusted third parties to fulfil our legal or contractual obligations, including:

- Administrative agents, registrars, transfer agents, and custodians based in Luxembourg;
- Auditors, legal advisors, and depository banks;
- IT service providers and infrastructure partners.

All such third parties are bound by strict contractual and confidentiality obligations ensuring the security and lawful processing of your personal data.

We may also disclose your data to public authorities, regulators, courts, or law enforcement agencies when required by law.

We do not transfer personal data outside the European Union unless appropriate safeguards under the GDPR (such as Standard Contractual Clauses) are in place.

### 6. Data Security

We maintain robust technical and organisational measures to protect personal data against

unauthorised access, alteration, loss, or destruction.

These include encryption, restricted access, continuous monitoring, and regular review of our systems and security practices.

All personnel and service providers are subject to professional secrecy under Luxembourg financial sector laws. Any breach of confidentiality may lead to criminal sanctions.

## 7. Your Rights

Under the GDPR, you are entitled to exercise the following rights concerning your personal data:

- Right of Access – request confirmation and obtain a copy of your personal data;
- Right to Rectification – correct inaccurate or incomplete data;
- Right to Erasure – request deletion of your personal data under certain circumstances;
- Right to Restrict Processing – temporarily limit data use in specific cases;
- Right to Object – object to processing based on legitimate interests;
- Right to Withdraw Consent – revoke consent at any time without affecting prior lawful processing;
- Right to Data Portability – obtain and reuse your personal data in a structured, machine-readable format.

To exercise your rights, please contact us at [gdpr@aulien.lu](mailto:gdpr@aulien.lu) or by post at AULIEN S.C.A., SICAV-SIF, GDPR Compliance, 1, Rue Bender, L-1229 Luxembourg.

If you believe your data protection rights have been infringed, you may lodge a complaint with the Luxembourg National Data Protection Commission (CNPD): <https://cnpd.public.lu>.

## 8. Data Retention

We retain personal data only as long as necessary for the purposes for which it was collected or to meet legal, regulatory, or policy obligations:

- Shareholders, account holders, or investors: 5 years after the termination of the relationship;
- Service providers or suppliers: 10 years after the end of the contract;
- Other data: retained only as long as required for the relevant processing purpose or applicable law.

## 9. Changes to This Policy

We may update this Privacy Policy periodically to reflect legal or operational changes. The most recent version is always available on our website: [www.aulien.lu](http://www.aulien.lu).

## 10. Contact

If you have any questions, comments, or complaints about this Privacy Policy or the processing of your personal data, please contact us at:

AULIEN S.C.A., SICAV-SIF  
1, Rue Bender, L-1229 Luxembourg  
Email: [gdpr@aulien.lu](mailto:gdpr@aulien.lu)

Effective Date: October 2025