

# **Privacy Policy**

## **I AM SICAV-RAIF Icon bridge**

### **1. Introduction**

I AM SICAV-RAIF Iconbridge (the "Fund") respects your privacy and is committed to protecting personal data in accordance with applicable laws, including the **General Data Protection Regulation (EU) 2016/679** ("GDPR") and Luxembourg's data protection laws.

This Privacy Policy explains how we collect, use, disclose, and protect personal data in the context of our activities.

### **2. Data Controller**

The Fund, registered in Luxembourg, acts as the Data Controller regarding personal data processing. The Fund's Management Company and relevant service providers (such as the Depositary, Central Administrator, and Investment Manager) may also process personal data on behalf of the Fund.

### **3. Personal Data We Collect**

We collect and process the following types of personal data:

- Identification data (name, date of birth, nationality, passport/ID details)
- Contact details (address, phone number, email)
- Financial information (bank account details, investment preferences, tax residency status)
- Professional data (employment details, corporate affiliations)
- Transaction details (investment history, capital contributions, redemptions)
- Compliance and regulatory data (AML/KYC information, sanctions screening, FATCA/CRS reporting data)

### **4. How We Collect Personal Data**

We collect personal data through:

- Subscription and investment processes
- Communications with the Fund or its service providers
- Regulatory and compliance checks
- Publicly available sources (e.g., official registries)
- Third-party service providers, intermediaries, or business partners

### **5. Purposes and Legal Basis for Processing**

We process personal data for the following purposes:

- **Fund administration and investment management** (contractual necessity)
- **Compliance with legal and regulatory obligations** (AML/KYC, FATCA/CRS reporting, investor due diligence)
- **Performance of contractual obligations** (investor services, transaction processing)
- **Security and fraud prevention** (legitimate interests)
- **Communication and investor relations** (legitimate interests or consent)

## 6. Disclosure of Personal Data

Personal data may be shared with:

- The Fund's Management Company, Depositary, Administrator, and Investment Manager
- Legal, tax, and compliance advisors
- Regulatory authorities (CSSF, tax authorities, financial intelligence units)
- IT and infrastructure service providers
- Auditors and other professional advisors

## 7. International Data Transfers

Where personal data is transferred outside the European Economic Area ("EEA"), we ensure appropriate safeguards, such as **EU Standard Contractual Clauses**, are in place.

## 8. Data Retention

Personal data is retained for as long as necessary to fulfill legal, regulatory, and contractual obligations. Generally, investor-related data is retained for at least **10 years** following the termination of the investor relationship, in accordance with Luxembourg regulatory requirements.

## 9. Data Subject Rights

Under GDPR, you have the right to:

- Access your personal data
- Rectify inaccurate or incomplete data
- Request data erasure (subject to legal limitations)
- Restrict or object to data processing
- Data portability
- Lodge a complaint with the **Luxembourg Data Protection Authority (CNPD)**

Requests to exercise these rights can be submitted via email to **[contact email]**.

## 10. Security Measures

The Fund implements appropriate **technical and organizational measures** to protect personal data from unauthorized access, alteration, disclosure, or destruction.

## 11. Updates to this Policy

This Privacy Policy may be updated periodically. The latest version will always be available on the Fund's website.

## 12. Contact Information

For any questions regarding this Privacy Policy, please contact:

**I AM SICAV-RAIF Iconbridge**

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This Privacy Policy is effective as of 01-01-2025