

# PRIVACY POLICY



Last updated: 02/05/2019

This Privacy Policy covers the responsibilities of Deltamark Fund Management Ltd with regards to the Data Protection regulation 679/2016/EU.

By visiting this website [www.dmark.eu](http://www.dmark.eu) and by contacting Deltamark Fund Management Ltd as well as by entering into a service agreement with Deltamark Fund Management Ltd, you confirm that you have read this Privacy Policy and understood the content. You agree with this policy and you give your consent to collect your personal data as specified in this Privacy Policy and to use this personal data for the purpose as described within this Privacy Policy.

You're aware that you can make use of your rights as displayed within this Privacy Policy at all times.

Deltamark Fund Management Ltd is a Cyprus based Alternative Investment Fund Manager, authorized and regulated by the Cyprus Securities and Exchange Commission as a full scope AIFM, with license no. AIFM06/56/2013.

Deltamark Fund Management Ltd. operates the internet domain [www.dmark.eu](http://www.dmark.eu), hosted in-house on proprietary server devices.

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## **Our Commitment to You**

At Deltamark Fund Management Ltd, we treat all individual visitors that enter our corporate website [www.dmark.eu](http://www.dmark.eu), as well as all private individuals that either represent our prospective and / or corporate clients as well as all our private individual clients as Data Subjects in the sense of the Data Protection regulation 679/2016/EU. Deltamark Fund Management Ltd fulfils the role of the Data Controller with regards to all personal data, which relates to all individual visitors that enter our corporate website, as well as to all individual persons among our clients, including representatives of our prospective and / or existing corporate clients (i.e. representative/s, local management and Universal Beneficial Owner/s).

Deltamark Fund Management Ltd has appointed a Data Protection Officer (DPO). This DPO remains independent within our corporate structure and has a direct connection to the top level management at Deltamark Fund Management Ltd. By submission of electronic correspondence to [dpo@dmark.eu](mailto:dpo@dmark.eu), you can get in touch with our DPO and submit your request with regards to your personal information.

We understand the importance of maintaining the confidentiality and privacy of your personal information and data. By entrusting us with your information and data, we would like to assure you of our commitment to keep such information private. We have taken measurable steps to protect the confidentiality, security and integrity of your information and data.

## **What Data do we at Deltamark Fund Management Ltd collect?**

Deltamark Fund Management Ltd collects personal information by the IT infrastructure of our corporate website provided by our website's server host device and during the course of rendering our regulated services to our clients. This information collected includes, but is not limited to the following data:

### From corporate clients

- Certificate of incorporation
- Certificate of shareholders
- Certificate of registered address
- Resolution of Directors
- Certificate of Incumbency
- Certificate of good standing
- Memorandum and Articles of Association
- Audited financial statements
- Copies of Licenses granted to the corporate entity
- Information on corporate bank account numbers
- Set of contact data of corporate entity

- Set of contact data of employees and / or local management and / or Universal beneficial Owner

From individuals representing a corporate client / individual clients

- Copy of Passport
- Copy of ID card
- Proof of physical address of an individual
- Information and documents related to an individual's profession and /or employment
- Criminal record of an individual
- Documents on the financial status of an individual (e.g. non-bankruptcy certificate)
- Professional certificates of an individual's professional background
- Documents regarding the educational background of an individual
- Documents related to the origin of wealth of an individual
- Contact telephone number(s) related to an individual
- Electronic mail address related to an individual

**What is your personal data used for?**

All sets of personal data related to an individual Data Subject, which is collected by Deltamark Fund Management Ltd, is used strictly for the purpose of rendering the variety of our regulated services to our prospective and / or existing clients under section 8 of the AIFM Law of 2013, which covers the Investment management Functions of section 6(5).

This requires internal processing of data in order to perform a functional risk management in the best interests of our clients and in order to install the client accounts respectively.

Our regulated services require also disclosures to external entities and governmental bodies as per our organizational structure. Your rights to your personal data remain valid at all times and can be utilized by contacting our Data Protection Officer (DPO) by electronic mail services to [dpo@dmark.eu](mailto:dpo@dmark.eu).

## **How is your personal data stored and/or retained?**

The Company will only use, store, process and handle the client's Personal Information and Data, in accordance Data Protection Regulation 679/2016/EU. Access is strictly limited to the authorized personnel to perform a specific task or duty only.

This means we retain hard copies of personal data related to individual persons (individual visitors of our corporate website, private clients and/or representative/s or UBO/s of corporate clients) in protected physical storage facilities, to which unauthorized persons do not have any access.

We retain electronic soft copies of personal data related to individual persons (individual visitors of our corporate website, private clients and/or representatives or UBO/s of corporate clients) in protected and encrypted IT facilities, free from unauthorized access.

All communication in which individuals share their personal data with Deltamark Fund Management Ltd, the communication channel is protected by a SSL secure log protocol technology.

## **Your Rights to your data**

In line with the provisions and requirements of the Data Protection Regulation 679/2016/EU on the protection of personal data, you retain the following rights to your personal data:

- You retain the right to review all personal information, which is related to you and which was / is collected during your visit of our corporate website and during the use and processing as described in this privacy policy at any time and to check the accuracy of personal data, which is related to you individually.
- You retain the right to have done corrections, rectifications and refreshments to your personal data.
- You retain the right to have your personal data deleted partly or completely.
- You retain the right to obtain information on the use and purpose to process your personal data.
- You retain the right to limit the purpose for processing and use of your personal data. However, this may have an effect on the accessibility of our regulated financial services rendered to you. You can refer to our DPO and / or our Compliance Department for further clarifications on this.
- You retain the right to opt-out from commercial and non-commercial newsletters and notifications from Deltamark Fund Management Ltd by notification to our DPO accordingly.
- You retain the right to have all personal data, which is related to you and which is or had been

collected during your visit and use of our corporate website and during your correspondence with Deltamark Fund Management Ltd, being transferred to another Data Controller nominated by you.

- You retain the right to withdraw your previously given explicit consent with regards to the collection, use and processing of your personal data at any time by contacting our Data Protection Officer by electronic mail services to [dpo@dmarm.eu](mailto:dpo@dmarm.eu).

You can submit your request to make use of the above rights to your personal data by contacting our Data Protection Officer (DPO) through electronic mail services to [dpo@dmarm.eu](mailto:dpo@dmarm.eu).

## **Disclosures**

We will not without your consent disclose to third parties any individually identifying information, such as names, postal and e-mail addresses, telephone numbers, or other, which you have provided to Deltamark Fund Management Ltd.

The rendering of regulated financial services to our company's prospective and / or existing clients requires the disclosure of personal data related to our prospective and / or existing clients in order to fulfil requirements defined by the regulatory legal framework in the Republic of Cyprus. Hence, we may pass on information related to our prospective and / or existing customers to third parties such as our professional and legal advisors, administrators or subcontractors. Deltamark Fund Management Ltd ensures the confidentially treatment of all disclosed data to external parties. You retain the rights to your personal data as described within this privacy policy. All third party agreements of Deltamark Fund Management Ltd. include a common standard on Data Protection.

The rendering of our corporate services requires the disclosure of personal data, which is related to our clients (subject to the explicit consent of the individual person – including representative(s) of corporate clients – to which the specific personal data relates), to third parties. These third parties are external service providers, which are legally and economically independent from Deltamark Fund Management Ltd. Prior to processing personal data related to our clients, Deltamark Fund Management Ltd will inform the specific client about that use and asks for the explicit consent of that person accordingly.

Personal data, which is collected during the visit of our corporate website may be disclosed to licensors of the software used on the Site. Please refer to our Data Protection Officer (DPO) in case you have questions on this or in case you want to make use of your rights related to your personal data as described in this privacy policy.

We may also disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Site Terms and Conditions. Furthermore, your personal data is permitted to be disclosed to public bodies only in cases where the disclosure concerns matters of national and/or international security, the prevention or investigation of criminal activities, law enforcements, where a public interest is given, a juridical proceeding against the person, to which the personal

data is related is pending or had been initiated or completed before and/or the personal security of the individual to which the personal data is related.

Deltamark Fund Management Ltd will communicate the specific purpose for processing of your personal data to you prior to its use as described in this privacy policy.

## **Cookie Policy**

Our corporate website [www.dmark.eu](http://www.dmark.eu) is using cookies. A cookie is a text file in the format .txt, which the host server of our corporate website sends to the browser application that an individual visitor of our corporate website is using when entering our corporate website. It is stored locally on the hard drive of the computer or telecommunication device used by the individual visitor of our corporate website when entering our corporate website. The data written into this file includes information on the IP address (Internet Protocol), the internet access service provider, the duration and frequency of a page visit sessions within our corporate website, data which was viewed or downloaded, the type of computer or telecommunication device used by the individual visitor of our corporate website as well as the geographical location of the individual visitor of our corporate website.

The data collected is read out from the cookie file by and retained on the website server / host in electronic form. The purpose for collecting this data is to identify a specific individual visitor after entering our corporate website. This data related to the individual visitor of our corporate website may be used by Deltamark Fundmanagement Ltd for internal statistical and analytical purpose only.

By entering our corporate website [www.dmark.eu](http://www.dmark.eu), we have asked you to submit your explicit consent to the cookie policy in electronic form.

**If you feel your personal data has been infringed by Deltamark Fund Management Ltd, please get in touch with our DPO by electronic mail services to [dpo@dmark.eu](mailto:dpo@dmark.eu).**