

# **WEBSITE PRIVACY NOTICE**

Japan Fund Management (Luxembourg) S.A.

*Last updated: April 2025*

## 1. Introduction

In accordance with article 13 of the General Data Protection Regulation (“GDPR”), Japan Fund Management (Luxembourg) S.A. (“JFML” or “the Company”), as data controller may process, by electronic or other means, the personal data of website users, including prospects or data subjects reaching out via the Company’s contact references as included within the website (“Data Subjects”).

**The current Privacy Notice describes to Data Subjects of the Company how their personal data are collected and processed and provides further explanation on the purposes, legal basis, sharing and transfer of personal data, as well as rights that Data Subjects have in relation to their personal data.**

We may update this notice from time to time, and timely include the latest version within the Company website. If you have questions, please feel free to send an email to JFML Data Protection Coordinator at [thierry.grosjean@jfml.lu](mailto:thierry.grosjean@jfml.lu).

## 2. What are the applicable legal basis, processing purposes and categories of personal data?

Legal basis	Processing purpose	Personal data
<b>Request of the data subject prior to entering into a contract</b> (article 6(1)(b) GDPR)	<ul style="list-style-type: none"><li>• Reply to your queries when reaching out the Company via the contact details provided on the Company’s website</li></ul>	<ul style="list-style-type: none"><li>• <b>Identity and personal information</b> (e.g., name, surname, gender)</li><li>• <b>Contact information</b> (e.g., email address, telephone number, address)</li><li>• <b>Professional information</b> (e.g., title)</li><li>• <b>Functional cookies</b></li><li>• Any other information shared on voluntary basis by the Data Subjects</li></ul>
<b>Legitimate interest</b> (article 6(1)(f) GDPR)	<ul style="list-style-type: none"><li>• Run our business, including managing our relationship with you, meeting our administrative, accounting and corporate obligations, maintaining and using our IT systems and facilities, such as the website.</li></ul>	

The personal data we process as a result of your visiting of our website depends on the data you provide to us. If you access our site but do not interact further with us, we will only process the data contained in cookies which are necessary to be able to run our site, namely functional cookies.

## 3. Transfer of personal data to third parties

Personal data will not be exchanged with any third parties, except to entities required for the performance of the processing of personal data for the aforementioned purposes. To this end, the Company may exchange personal data with external service providers (e.g. IT service providers), affiliates or other entities at group level (the “Recipients”).

In such cases, the Company ensures that relevant Recipients process personal data only in accordance with dedicated instructions and/or based on adequate privacy and data protection measures and contractual framework. The Recipients are generally located in the European Union or in countries outside of the European Union ensuring an adequate level of protection of personal data, such as Japan. If not, the Company and the Recipients put in place appropriate transfer safeguards, such as EU standard contractual clauses to ensure the relevant personal data is adequately protected.

## 4. Further processing and change of purpose

We will not use your personal data for any reason other than for the purposes indicated in this privacy notice. If we need to use your personal information for an unrelated purpose or a subsequent purpose due to the nature of Data Subject’s requests (e.g. recruitment, business relationships or clients service), reference should be made to the dedicated information notice of the Company available on the website, namely:

- Video Surveillance and Office Visitors Privacy Notice
- Privacy Notice for Clients and Business Partners
- Recruitment Privacy Notice

## **5. Personal data retention period**

Personal data will be stored for the longest of the following periods: (i) as long as is necessary for the purpose of which it was collected, (ii) any retention period that is required by law or (iii) the end of the liability period in which litigation or investigations might arise in respect of our services and business.

After the applicable retention period(s) have expired, personal data will be deleted or anonymized.

## **6. Your rights in respect of your personal data**

Each Data Subject has a right to access his/her personal data and may ask for such personal data to be rectified when it is inaccurate or incomplete. Each Data Subject also has a right to be informed and to object to the processing of such personal data, to ask for erasure of such personal data, to ask for data portability and for the limitation of processing of such personal data. You will not be subject to decision solely based on automated decision-making without human intervention.

In relation thereto, the Data Subject may exercise the above rights by writing to JFML Data Protection Coordinator at [thierry.grosjean@jfml.lu](mailto:thierry.grosjean@jfml.lu). The Data Subject also has a right to lodge a complaint with the Luxembourg data protection supervisory authority, the National Commission for Data Protection (CNPD).