



Shelter Investment Management

# General Data Protection Regulation

	<h2>GDPR Policy</h2>	Date: <b>18/11/2021</b> Version N°: <b>V2.3</b> Status: <b>Validated</b>
-----------------------------------------------------------------------------------	----------------------	--------------------------------------------------------------------------------

Process Document Description	
<i>Objective/Description</i>	<p>Shelter Investment Management attaches great importance to privacy and wants to fully respect this by treating personal data as safely and confidentially as possible. In this document, you will find the General Data Protection Regulation within Shelter Investment Management. GDPR applies throughout the European Union from May 25, 2018 and requires the presence and implementation of contracts between data controllers and their data processors.</p> <p>The objective of this data protection statement in accordance with GDPR is to protect the rights of data subjects, to explain which personal data is processed and why.</p>
<i>Entity</i>	Shelter Investment Management

Update Document Management – Version History				
<i>Version</i>	<i>Date</i>	<i>Status</i>	<i>Author</i>	<i>Modification Type</i>
1.0	27/04/2018	Draft	Ludovic Dellal	Creation of the document
2.0	02/05/2018	Update	Olivier Lechanteur	Update document
2.1	20/05/2019	Update	Olivier Lechanteur	Update contact list
2.2	25/06/2021	Update	Sandra Van Vaerenbergh	Update notification procedure
2.3	31/08/2022	Update	Sandra Van Vaerenbergh	Update for new DPO

Validation of this document			
<i>Date</i>	<i>Approver</i>	<i>Function/Unit</i>	<i>Status</i>
18/05/2018	Christophe Pecoraro	Board Member	Validated
18/05/2018	Benedict Peeters	Board Member	Validated
20/05/2019	Benedict Peeters	Board Member	Validated
28/06/2021	Board (by Board Resolution)		Validated
18/11/2022	Board		Validated

## Table of Contents

1	Introduction.....	3
2	Key Features .....	3
3	Policy/Procedure .....	3
4	Data Protection Control .....	4
5	Register of treatment of activities.....	4
6	Appendix: Contacts .....	4

## 1 Introduction

ShelteR Investment Management attaches great importance to privacy and wants to fully respect this by treating personal data as safely and confidentially as possible. In this document, you will find the General Data Protection Regulation within ShelteR Investment Management. GDPR applies throughout the European Union from May 25, 2018, and requires the presence and implementation of contracts between data controllers and their data processors.

The objective of this data protection statement in accordance with GDPR is to protect the rights of data subjects, to explain which personal data is processed and why.

## 2 Key Features

Data controllers are natural or legal persons, public authorities, agencies, or any other bodies which alone or jointly with others determines the purposes, conditions and means of the processing of personal data.

Data processors are natural or legal persons, public authorities, agencies, or any other bodies which process personal data on behalf of the controller.

Third parties are natural or legal persons, public authorities, agencies or bodies other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

## 3 Policy/Procedure

The data collected by ShelteR Investment Management is strictly gathered for the purposes specified in contractual agreements. Generally, the objective of investment management is not to collect and process data. However, business operations include direct involvement with personal data of the subjects and processing this data.

The objective of data utilisation must be defined transparently. Under GDPR the data subjects have the right of access, rectification, and erasure ("right to be forgotten"). Data subjects also have the right to data portability, to object and to restriction of processing.

Access to data can be provided according to the functions of each team member in the company and to other parties involved for the same purposes specified in contractual agreements. Each party should be aware of their role in controlling and processing data and their obligations under GDPR.

The time frame for data retention can vary according to its purpose and in accordance with applicable legal obligations. Data can be erased upon request, as the data subjects have the right of erasure.

In case of data breach, immediate action will be taken to ensure that no further data is compromised. The supervisory authority competent must be notified within 72 hours, without any delay and where feasible, after awareness of the breach, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where the notification to the supervisory authority is not made within 72 hours, it shall be accompanied by reasons for the delay.

## 4 Data Protection Control

ShelteR Investment Management continues to enhance privacy policies to meet GDPR requirements and to maintain regulatory developments. Hereby, implementation of appropriate actions is necessary to ensure that all data is effectively managed and protected.

## 5 Register of treatment of activities

According to article 30 (5) of the EU Regulation 2016/679 the obligations in paragraphs 1 and 2 shall not apply to an organization employing fewer than 250 persons, unless the processing it carries out is likely to result in a risk to the rights and freedoms of data subjects, the processing is not occasional, or the processing includes special categories of data as referred to in article 9 (1) of the Regulation (i.e. sensitive information) or personal data relating to criminal convictions and offences referred to in Article 10. As SIM is employing less than 250 persons and doesn't treat any such information, the obligation to formalize a register of treatment of activities in the light of art 30 (1 and 2) is not deemed applicable.

## 6 Appendix: Contacts

Function	Name	Mail	Tel
Data Protection Officer	Sandra Van Vaerenbergh	<a href="mailto:sv@shelter-im.com">sv@shelter-im.com</a>	T: +352 206 03 000 80
Head of Portfolio Management	Tim Vanvaerenbergh	<a href="mailto:tv@shelter-im.com">tv@shelter-im.com</a>	T: +352 206 03 000 50
Risk Management Function	Sandra Van Vaerenbergh	<a href="mailto:SV@shelter-im.com">SV@shelter-im.com</a>	T: +352 206 03 000 80