

Data Protection Policy

GAMAX Management AG, a “*société anonyme*” established under the laws of the Grand-Duchy of Luxembourg, having its registered office at 11/13, Boulevard de la Foire, L - 1528 Luxembourg, registered with the Luxembourg Trade and Companies Register under number B40494 (hereinafter “**GAMAX**”) is committed to handling personal data in compliance with European and national Personal Data Protection relevant legislations (“**Data Protection laws**”).

GAMAX aims also at dealing promptly and efficiently with any concerns relating to its processing of personal data and/or non-compliance with the present Data Protection Policy (“**Data Protection Policy**”).

1. SCOPE AND PURPOSE

1.1 GAMAX needs to collect and process certain information about natural persons who can be identified from that information, whether directly or indirectly, and in particular by reference to one or more factors specific to their physical, physiological, mental, economic, cultural or social identity (“**Personal Data**”). These can include customers, suppliers, partners, business contacts, employees, etc...

1.2 This Data Protection Policy defines how this Personal Data must:

- (i) be collected, processed, handled and stored to meet GAMAX’s data protection standards.
- (ii) comply with the relevant laws.

1.3 This Data Protection Policy ensures GAMAX:

- (i) complies with the relevant laws;
- (ii) protects the rights of customers, suppliers, partners, business contacts, employees; and
- (iii) protects itself from data breach’s risks.

2. SCOPE OF THE DATA PROTECTION POLICY

The Data Protection Policy applies to:

- GAMAX;
- all staff of GAMAX;
- all contractors, suppliers and others persons working on behalf of GAMAX; and to:
- all data held by GAMAX relating to identifiable individuals:

3. RESPONSIBILITIES

3.1 Everyone who works for or with GAMAX shall contribute to ensure data is collected, stored and handled appropriately.

3.2 Each employee that handles Personal Data must ensure that it is handled and processed in line with this Data Protection Policy and data protection principles:

- the only people able to access data covered by this Data Protection Policy should be those who need it for their work;
- data should not be shared informally;
- internal training to all employees will be implemented to help them to understand their responsibilities when handling data;
- employees should keep all data secure i.e. use of strong passwords, no disclosure of Personal Data to unauthorized people internally or externally;
- regular review and update of data and deletion when no longer required;
- employees should request help from their manager or the Data Protection Officer of GAMAX, the Data Protection Officer sits in the Compliance Function at Mediolanum Irish Operations and can be contacted at dpo@mediolanum.ie, , if they are not sure about any aspect of data protection.

4. PROCESSING PRINCIPLES

4.1 The Data Protection Laws lay down legal obligations for GAMAX on how collecting, handling and storing personal information.

4.2 The rules apply whether data is stored electronically, on paper or on other materials. Personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

4.3 Consequently, processing of Personal Data shall follow the following principles:

- Fair and lawful processing of Personal Data: the Company collects and process Personal Data in a fair and lawful manner, meaning:
 - a. Lawful and Fair: processing of Personal Data shall be based on a valid legal basis according to Data Protection Laws and may not be used in ways that have unjustified or disproportional adverse effects on a data subject and/or could be unlawful;
 - b. Transparent: GAMAX must be transparent with data subjects about its processing activities;
- Purpose limitation: Personal Data must be obtained only for specified and lawful purposes and used only in ways a data subject would reasonably expect it to be used. Personal Data must also only be processed in a manner compatible with the purposes for which it was collected;
- Data minimization: Personal Data must be adequate, relevant and not excessive in relation to the purposes for which they are collected and processed.
- Accuracy: Personal Data processed must be accurate and, if necessary, kept up to date. GAMAX undertakes to carry out every effort to delete or rectify inaccurate or incomplete data.
- Storage limitation: Personal Data must not be stored for longer than is necessary for the purposes for which they are processed.
- Respect for the Rights of data subjects: GAMAX must respect and give effect to the rights of data subjects where it processes their Personal Data.

5. RIGHTS OF DATA SUBJECTS

Every data subject has the following rights that GAMAX and all of its agents and employees must respect. These include:

- the Right of access by the data subject: The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- (a) the purposes of the processing;
 - (b) the categories of Personal Data concerned;
 - (c) the recipients or categories of recipient to whom the Personal Data have been or will be disclosed, in particular recipients in third countries or international organisations;
 - (d) where possible, the envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period;
 - (e) the existence of the right to request from the controller rectification or erasure of Personal Data or restriction of processing of Personal Data concerning the data subject or to object to such processing;
 - (f) the right to lodge a complaint with a supervisory authority;
 - (g) where the Personal Data are not collected from the data subject, any available information as to their source;
 - (h) the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject
 - (i) In the event Personal Data are transferred to a third country or to an international organization, the data subject shall have the right to be informed of the appropriate safeguards implemented by GAMAX to ensure the legality of such transfer.
- the Right to rectification: The data subject shall have the right to obtain from GAMAX without undue delay the rectification of inaccurate Personal Data concerning him or her or the right to have incomplete Personal Data completed.
 - the Right to erasure: The data subject shall have the right to obtain from GAMAX the erasure of Personal Data concerning him or her without undue delay and GAMAX shall have the obligation to erase Personal Data without undue delay where the data subjects invoke a valid ground as specified in the Data Protection Laws.
 - the Right to restriction of processing: The data subject shall have the right to obtain from GAMAX restriction of processing where the data subjects invoke a valid ground as specified in the Data Protection Laws.
 - the Right to portability: The data subject shall have the right to receive the Personal Data concerning him or her, which he or she has provided to GAMAX, in a structured, commonly

used and machine-readable format and have the right to transmit those data to another controller without hindrance. The data subject may request to have the Personal Data transmitted directly from GAMAX to another data controller, where technically feasible.

- the Right to object: The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of Personal Data concerning him or her where the processing is based on the fact that:
 - a. such processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in GAMAX;
 - b. such processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party;
 - c. Personal Data are processed for direct marketing purposes;
- the Right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.
- the Right to lodge a complaint with the supervisory authority. In Luxembourg, the competent supervisory authority is the *Commission Nationale pour la Protection des données* (the “**CNPD**”)

6. REQUESTS FROM DATA SUBJECTS

When GAMAX is acting as Data Controller:

- (i) GAMAX shall provide in an intelligible form, upon written request from an individual, and in accordance with the deadlines specified by relevant laws, the information that constitutes Personal Data processed by GAMAX in relation to the relevant individual, and such supporting information as is required by relevant laws, unless GAMAX is permitted by relevant laws to refuse or only comply partially with the request. All requests for access to Personal Data received by an employee of GAMAX should be directed to the Data Protection Officer of GAMAX at the following address: dpo@mediolanum.ie. GAMAX will verify the identity of anyone having a request handing over any information.
- (ii) GAMAX may, where permitted by relevant laws (i.e. in case of requests manifestly unfounded or excessive), charge a reasonable fee for the provision of copies of Personal Data requested by individuals;

- (iii) GAMAX shall amend, update or delete, as appropriate or upon notification, any Personal Data which is found to be incorrect;

- (iv) GAMAX shall respect individuals' right to obtain erasure of the data processed, where the requirements of applicable laws are met. Upon written request from an individual and without undue delay, GAMAX shall erase information that constitutes Personal Data in relation to the relevant individual and such supporting information as is required by relevant laws, unless GAMAX is permitted by relevant laws to refuse or only comply partially with the request. All requests for erasure of Personal Data received by an employee of GAMAX should be directed to the Data Protection Officer of GAMAX, the Data Protection Officer sits in the Compliance Function at Mediolanum Irish Operations and can be contacted at dpo@mediolanum.ie. GAMAX will verify the identity of anyone having a request to erase their Personal Data and the lawfulness of such request.

- (v) GAMAX shall restrict the processing of Personal Data upon written request from an individual meeting the requirements of applicable laws. In this respect, GAMAX shall suspend the processing of Personal Data, with the exception of storage of such Personal Data or other kind of processing meeting the requirements of applicable laws. GAMAX shall inform the individual before lifting the restriction of processing. All such requests shall be directed to the Data Protection Officer of GAMAX, the Data Protection Officer sits in the Compliance Function at Mediolanum Irish Operations and can be contacted at dpo@mediolanum.ie. GAMAX will verify the identity of anyone having a request of restriction Data and the lawfulness of such request.

- (vi) GAMAX shall respect individuals' statutory right to object to the way their data is processed by GAMAX. Objections shall be directed to the Data Protection Officer of GAMAX, the Data Protection Officer sits in the Compliance Function at Mediolanum Irish Operations and can be contacted at dpo@mediolanum.ie. All legitimate objections will be investigated and necessary action taken, including rectification, erasure or destruction of data, where appropriate;

- (vii) Within the framework of the application of the right of data portability, GAMAX shall be in the position to provide individuals with their Personal Data in a structured, commonly

used and machine-readable format so that such individuals may have the possibility to transmit those data to another controller without hindrance upon written request meeting the requirements of applicable laws. GAMAX shall also be able to provide directly such Personal Data on the new data controller chosen by the individual if requested. All requests for data portability shall be directed to the Data Protection Officer of GAMAX the Data Protection Officer sits in the Compliance Function at Mediolanum Irish Operations and can be contacted at dpo@mediolanum.ie. GAMAX will verify the identity of anyone having a request to erase their Personal Data and the lawfulness of such request.

- (v) GAMAX shall take into account of individuals' legitimate interests and inform them of the logic involved in respect of decisions that are made using their Personal Data purely by automatic means with no human involvement and which: (i) are intended to evaluate certain personal aspects relating to the individual; and (ii) produce legal effects concerning or significantly affecting the individual.

7. SECURITY

6.1 GAMAX shall take all adequate technical and organizational measures with a view to protecting Personal Data against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access.

6.2 In the event of an accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access to Personal Data, GAMAX shall notify such data breach without undue delay and, where feasible, not later than 72 hours to the competent supervisory authority, unless the Personal Data breach is unlikely to result in a risk to the rights and freedoms of natural persons.

6.3 When the Personal Data breach is likely to result in a high risk to the rights and freedoms of natural persons, GAMAX shall communicate the Personal Data breach to the data subject without undue delay.

6.4 For the purposes of this Section, each employee of GAMAX, contractors, suppliers and other persons processing data on behalf of GAMAX shall report data breaches it has knowledge of immediately after becoming aware of it to the Data Protection Officer of GAMAX, the Data

Protection Officer sits in the Compliance Function at Mediolanum Irish Operations and can be contacted at dpo@mediolanum.ie.

8. TRANSFER OF PERSONAL DATA TO DATA PROCESSOR

7.1 When transferring data to a data processor, GAMAX shall ensure that said data processor provides sufficient guarantees to implement appropriate technical and organizational measures in such a manner that processing will meet the requirements of the Data Protection Laws and ensure the protection of the rights of the data subject.

7.2 Relations with said data processor shall be subject to a written and legally binding contract between GAMAX and the data processor that sets out the subject-matter and duration of the processing, the nature and purpose of the processing, the type of Personal Data and categories of data subjects and the obligations and rights of GAMAX.

7.3 Additionally, said contract shall stipulate that:

- the data processor shall only process Personal Data in accordance with GAMAX documented instructions;
- the data processor ensures that persons authorised to process the Personal Data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality;
- the data processor must guarantee to put in place appropriate security measures to safeguard the Personal Data;
- the data processor shall only engage data processors authorized by GAMAX who accepted to be subject to the same data protection obligations as set out in the contract between GAMAX and the initial processor. Where a general authorization to engage another data processor has been granted by GAMAX, the data processor shall inform GAMAX of the identity of such processor and of any intended changes concerning the addition or replacement of a processor. GAMAX shall have the opportunity to object to such a processor being engaged.
- the data processor shall assist GAMAX for the fulfilment of its obligation to respond to requests for exercising the data subject's rights
- the data processor shall assist GAMAX in ensuring compliance with its obligations to guarantee the security of the processing, to notify data breaches to the competent

supervisory authority or data subjects, to carry out data protection impact assessment including by the prior consultation of the competent supervisory authority.

- the data processor shall either delete or return all Personal Data to the controller after the end of the provision of services relating to processing and deletes existing copies unless applicable laws requires storage of the Personal Data.
- the data processor shall make available to GAMAX all information necessary to demonstrate compliance with the above-mentioned obligations and allow for and contribute to audits, including inspections, conducted by GAMAX or another auditor mandated by GAMAX.

9. QUESTIONS, CONCERNS AND ENQUIRIES

8.1 If questions arises concerning the processing of Personal Data within GAMAX, the application of this Data Protection Policy or if the data subject believes that his/her data is not processed in compliance with this Data Protection Policy, the question/concern shall be referred to the Data Protection Officer of GAMAX, the Data Protection Officer sits in the Compliance Function at Mediolanum Irish Operations and can be contacted at dpo@mediolanum.ie.

8.2 If an employee receives a complaint from a data subject outside of GAMAX, that complaint must be forwarded to the Data Protection Officer of GAMAX, the Data Protection Officer sits in the Compliance Function at Mediolanum Irish Operations and can be contacted at dpo@mediolanum.ie.

8.3 The Data Protection Officer will review the complaint on a confidential basis.

8.4 GAMAX shall promptly initiate an investigation into any allegation of violation of this Data Protection Policy, which was made in good faith.

8.5 Employees are required to cooperate with internal investigations related to possible Data Protection Policy violations.

8.6 In order to allow GAMAX to properly investigate a concern, allegations of non-compliance with or violation of this Data Protection Policy should include sufficient information concerning the incident or the violation.

8.7 GAMAX will treat the identity of any individual making a complaint as confidential. However, in certain circumstances, GAMAX may be obliged by law to disclose the information or the identity of the person submitting the complaint or allegation.

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