

Privacy Policy

Introduction

Opportunity Financial Services SA is an independent company supervised by the Luxembourg Financial Sector Supervisory Commission (CSSF) as Professionel du Secteur Financier – PSF Spécialisé. The Company provides professional corporate services and fund administration to multiple type of entities. It has specialised in servicing real estate, private equity and other traditional and alternative investment structures, as well as providing solutions for institutional, corporate, startups and private clients.

Opportunity Financial Services SA (hereinafter referred as “The Company”) is a fully integrated fund and corporate services provider dedicated to clients in Luxembourg but also internationally, and is committed to respecting your privacy - wherever you may be in the world.

In that framework, this legal notice explains how we collect, share, safeguard and use your personal data, and how you can exercise your privacy rights. More precisely, this document aims to give you information on how the Company collects and processes your personal data through your use of this website, including any data you may provide through this website when you complete the “Contact Us” form, sign up to our newsletter or if you request other marketing materials.

Personal Data we collect – Data Protection

The purpose of data protection law is to protect your rights and privacy when we process your personal data. Personal data is any information relating to an identified or identifiable natural person. A person is "identifiable" if he or she can be identified, directly or indirectly, not only by things such as a name or an identification number, but also by things such as location data or some factor specific to (for example) the physical, physiological or social identity of that person.

More common examples of personal data include names, identification numbers, contact information, identity documents, medical records and photographic images and it may be contained in written document or in a recording, voicemail, for example. "Processing" covers any activity involving personal data and includes such things as the collection, recording, storage, adaptation, use, disclosure and destruction of personal data.

Security of all personal data is extremely important to Opportunity Financial Services. We have implemented generally accepted standards of technology and operational security to protect personal information from loss, misuse, alteration or destruction. We require all employees and principals to keep personal information confidential and only authorized personnel have access to this information.

In general, within the framework of our activities, we are led to process your personal data. This processing covers elements related to our website but this is only a small part. Opportunity Financial Services S.A. collects your personal data when you:

- Fill in an online “Contact Us” form;
- Visit our website (see Cookie paragraph);
- Request, contract and use a service from us;
- Communicate with us via phone calls, email, web forms or social media;
- Submit personal data to us to comply with AML or KYC obligations;
- Apply for employment or participate in recruitment events or activities;
- Attend our events.

We collect the minimum amount of information to enable us to deal with your request. We would normally only request additional information to enable us to provide the most appropriate response to your request.

The personal data that the users disclose voluntarily to Opportunity Financial Services S.A. is processed confidentially, and will not be transmitted under any circumstances to third parties without their prior consent, and only in accordance with the provisions of Luxembourg law concerning data protection and professional ethics.

In the framework of our activities and in accordance with the technical elements of this website, we may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes but is not limited to first name, last name, date of birth, place of birth, nationality, passport details, national identity card number or social security number;
- **Contact Data** includes email address, telephone number(s) and postal address;
- **Financial Data** includes banking details, income details, tax information, source of wealth;
- **Employment Detail** includes job titles, employment history and any information provided as part of an employment application;
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

We may use aggregated data in an anonymized way derived from your personal data, but which does not constitute personal data.

Within the strict meaning of your visit to our website, we do not disclose personal data gathered to third parties. Nevertheless, when you are a client, a prospect, a partner, or any business relationship, we may be required to disclose your data. This is always done within a limited and precise framework as authorized by law.

When necessary, Opportunity Financial Services S.A. shares your personal data with:

- Tax, government and any relevant regulatory authorities
- Prosecuting authorities and courts, and/or other relevant third parties connected with legal proceedings or claims
- Fraud prevention and/or law enforcement agencies
- Other suppliers and providers of services to us, including banks, our sub-contractors and agents;

- Third parties where Opportunity Financial Services S.A. is required to do so by law
- Third parties to whom we disclose information in the course of providing services to you or to the entity that has engaged us to provide the services

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Your rights

You have the right to request access to the personal information that you have submitted through www.opportunityfs.com or in the framework of our business relationship, update or correct your details, restrict our use of your personal information, object to our use of your personal information, receive your personal information in a usable electronic format and transmit it to a third party, opt out of receiving other information or request that your personal details are deleted from our systems at any time by e-mailing our DPO: compliance@opportunityfs.com. We will treat all such requests in accordance with applicable law.

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means. We also consider any applicable legal requirements relating to time frames for the retention of data.

You may have some or all of the following rights under applicable data protection laws in respect of your data that we hold:

- You have the right of access to your personal data and can request copies of it and information about our processing of it.
- If the personal data we hold about you is incorrect or incomplete, you can ask us to rectify or update it.
- Where we are using your personal data with your consent, you can withdraw your consent at any time.
- Where we are using your personal data because it is in our legitimate interests to do so, you can object to us using it this way.
- You can ask us to restrict the use of your personal data if:
 - It is not accurate.
 - It has been used unlawfully but you do not want us to delete it.
 - We do not need it anymore, but you want us to keep it for use in legal claims; or
 - If you have already asked us to stop using your data but you are waiting to receive confirmation from us as to whether we can comply with your request.

Your rights to object to our processing of your personal data are not absolute and it may be that in some circumstances we can continue to process your personal data if we can demonstrate compelling legitimate grounds, which override your interests, rights and freedoms or if the processing is for the establishment, exercise or defence of legal claims.

In the first instance, if you would like to make a complaint about our processing of your personal data, please do so via the email address mentioned above. However, should such a complaint be unresolved, you have the right to make a complaint to a relevant Data Protection Supervisory Authority, either in your home jurisdiction, or in the jurisdiction in which the processing is being undertaken.

Cookies

This website uses cookies to support the technical performance or security of the website, to monitor how it is used and as part of links to third party platforms.

Cookies are also technical means to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

Cookies are small text files which are downloaded to your computer or mobile device when you visit a web site or application. Your web browser (such as Internet Explorer, Mozilla Firefox or Google Chrome) then sends these cookies back to the web site or application on each subsequent visit so that they can recognize you and remember things like personalized details or user preferences. Cookies do not damage your system. You can reset your browser to refuse any cookie or to alert you to when a cookie is being sent.

We use the following cookies:

- Strictly necessary cookies are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- Analytical/performance cookies allow us to recognize and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies are used to recognize you when you return to our website. This enables us to personalize our content for you, greet you by name and remember your preferences.
- Targeting cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

There are various ways that you can control and manage your cookies which are discussed in a bit more detail below. Please remember that any settings you change will not just affect www.opportunityfs.com cookies. These changes will apply to all web sites that you visit (unless you choose to block cookies from particular web sites).

Most modern browsers will allow you to:

- See what cookies you've got and delete them on an individual basis;
- Block third party cookies;
- Block cookies from particular web sites;
- Block all cookies from being set;
- Delete all cookies when you close your browser;

You should be aware that any preferences will be lost if you delete cookies. This includes where you have opted out from cookies, as this requires an opt-out cookie to be set. Also, if you block cookies completely many web sites will not work properly and some functionality on these web sites will not work at all.