

Anywealth: Privacy Statement

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Introduction

Welcome to Anywealth (hereinafter referred to as “**Anywealth**” or the “**Application**”) which is a platform based application accessible via a website which is entirely owned by Deloitte Tax & Consulting, *société à responsabilité limitée* (hereinafter referred to as “**we**” or “**Deloitte Luxembourg**”) and provided by the latter through Luxembourg external service providers (hereinafter referred to as the “**Services Providers**”).

Deloitte Luxembourg is an affiliate of the Luxembourg member firm of Deloitte Touche Tohmatsu Limited. Unless otherwise specifically defined, Deloitte generally refers to one or more of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee, and its network of member firms (hereinafter referred to as “**Deloitte Network**”), each of which is a legally separate and independent entity. Please see www.deloitte.com/about for a detailed description of the legal structure of Deloitte Touche Tohmatsu Limited and its member firms.

Anywealth may be used by the company which has entered into an Anywealth Client License Agreement with Deloitte Luxembourg (hereinafter referred to as the “**Client**”) and by the Client’s employees who have been duly authorised by the Client to use the Application with the credentials of the Client (each a/the “**User**”) in accordance with the Anywealth terms of use (hereinafter referred to as the “**Terms of Use**”).

This Privacy Statement (“**Privacy Statement**”) governs the use of the Application operated by Deloitte Luxembourg by the User and sets forth the manner in which we use and process the personal data that the User provided to us through our Application.

Unless otherwise indicated, capitalised terms and expressions used in this Privacy Policy shall have the meaning given to those terms and expressions in the **Terms of Use**.

General

In order to provide the User with the access to and use of the Application and to meet our legal and regulatory obligations, Deloitte Luxembourg must ask the User to provide certain information about himself. This privacy statement describes the personal data we collect and how that information is put to use.

By using our Application and/ or submitting his personal data to it, the User consents to, and agrees with the terms of this Privacy Statement and the User expressly consents and agrees to us using his personal data in the manner set out herein.

If you, as a User, disagree with the terms of this Privacy Statement, please do not sign up for or use the Application.

Personal Data Collected and Used

In order to enable the User of our Application to display certain pages and access certain tools and features, when specifically requested by him, we require some personal information (hereinafter referred to as the (“**Personal Registration Data**”) to which the Luxembourg law of 2 August 2002 on the protection of persons with regard to the processing of personal data as amended applies (hereinafter referred to as the “**Data Protection Act**”). Such Personal Registration Data may consist of the User’s name, current job title, company address, email address, and telephone and fax numbers.

These Personal Registration Data are necessary for us and / or for the Service Providers to provide the User access to the Application, to contact the User, should the need arise in administering the Application to seek feedback on services provided by entities within the Deloitte Network or for marketing purpose and to comply with our legal and regulatory obligations, or in order to enforce or apply our Terms of Use.

Disclosure of information to third parties

We may provide the User’s Personal Registration Data to other entities within the Deloitte Network or to Service Providers in order to provide to the User with access to the Application as well as in order to provide the User with information that could be of interest to him or to conduct marketing research. Personal Registration Data may also be disclosed to other entities within the Deloitte Network and other third party’ service providers in order to respond to the User’s requests or inquiries who may process the User’s Personal Registration Data.

The Personal Registration Data that we collect from the User may be transferred to, and stored at, other entities within the Deloitte Network and/or service providers operating within or outside of the European Economic Area. Some of those countries may not provide for a level of data protection that is deemed appropriate in the view of the European Commission. By submitting his Personal Registration Data, the User requests us to transfer, store and/or process his personal data, including in countries located outside of the European Economic Area and agrees for the same.

More particularly, by submitting his Personal Registration Data regarding the access and use of the Application, the User requests us to transfer, store and/or process his Personal Registration Data in our capacity of data processor, and agrees for such transfer, storing and processing as well for processing of Personal Registration Data by the Service Providers to provide the User access to the Application.

In order to comply with legal or regulatory obligations or requests, personal information may also be disclosed to law enforcement, regulatory, government agencies, or to other third parties, as required by applicable laws and regulations, or legally required on important public interest grounds, or for the establishment, exercise or defence of a legal claim.

Only the User is responsible for the full compliance with his obligations under the Terms of Use. If the User decides he no longer wishes to receive postal mailings and/or e-mails from us or the Service Providers, the User shall let us know by sending an e-mail or writing to us and telling us he no longer wishes to receive postal mail and/or e-mail. The User shall provide us with his exact name, postal address, and/or e-mail address. We will ensure that his name is removed from our mailing list.

We will store the User's personal data only for as long as required for the purposes for which they have been collected and/or to the extent that we are obliged to do so under applicable legal data retention requirements.

The attention of the User is drawn to the fact that in any event Deloitte Luxembourg will act only as a data processor and therefore, it is the responsibility of the User to comply with any legal formalities in this respect and Deloitte Luxembourg shall not be responsible for any such formalities.

Log information, cookies, and web beacons

Cookies are small files of data that reside on the User's computer and allow us to recognise the User as a user if he returns to our Application using the same computer and browser (e.g. to display the User's email address on his log-in form, so that the User doesn't have to retype his email address every time he logs in to our Application).

The User is free to decline our cookies in his web browser settings, but doing so may interfere with the User's efficient use of our Application.

We may set and use, either directly or through a third party service provider, cookies for statistical information and analysis on the use of the Application. These cookies store information or access information in the User's terminal device to estimate the number of unique visitors, to analyse the use of our Application and to track down Application navigation issues. These tools are used to improve our services and collect data on Application requests, the User's web browser (e.g. type, language, version, settings) and operating systems.

Those cookies are set to expire after twelve months at the latest.

The information collected during visit of the Application by the User will be stored and processed anonymously. Any such statistical information may be disclosed to third parties only in accordance with the above clause "**Disclosure of information to third parties**".

When using our Application, the User may encounter cookies from third parties we do not control and we are not responsible for the use of such cookies.

Linked sites

The Application may host links to other websites. Such sites are outside of our control and governed by their own privacy statements and we are not responsible for their operation. If the User uses any such linked sites, the User should consult the privacy policies posted on those websites before disclosing his personal data.

Access to information

At any time, the User has a right of access to and rectification of and deletion of any personal data we hold on the User. In particular, the User may access his user profile, correct, and update his details, or unsubscribe at any time. Should the User have any problem accessing his profile or shall wish to exercise his rights the User may contact webmaster services using lucanyweath@deloitte.lu

Information security

Although we have in place reasonable commercial standards of technology and operational security to secure the Application as well as appropriate technical and organisation measures in order to protect the User personal data against unauthorised or unlawful processing and accidental loss, destruction an or damage we can not fully control and therefore to the extent permitted by law, we can not be liable for all interruptions, intrusions, errors, loss of data or any other interferences with the use of the Application caused by a breach of security.

Changes to our Privacy Statement

We may modify or amend this Privacy Statement from time to time at our discretion. When we make changes to this Statement, we will amend the revision date at the top of this page, and such modified or amended Privacy Statement shall be effective as to the User and his information as of that revision date. We encourage the User to periodically review this Privacy Statement to be informed about the most current version of our Privacy Statement.

Users' questions

If the User wants to exercise his right to access or rectify his personal data or has any questions or concerns regarding the Users' privacy while using the Application, please contact the webmaster services using luanyweath@deloitte.lu.

In all cases we will treat requests to access information or change information in accordance with applicable legal requirements.