

# PRIVACY STATEMENT

JGL STRATEGIC SOLUTIONS  
RUE GRANDE-DUCHESSE CHARLOTTE 84  
L-9515 WILTZ  
LUXEMBOURG

VIVACITY-FUNDS.LU  
INFO@VIVACITY-FUNDS.LU  
COC LU 26748641

## 1. GENERAL

### A. PRIVACY

- i. JGL Strategic Solutions takes your privacy seriously. We process personal data about you, because you use our website, our services and also because you provide this information to us.
- ii. We do our utmost to process the information you have provided in a careful manner. This privacy statement gives you a clear overview of what personal data we process, how we handle your personal data and also explains as clearly as possible why we collect it.
- iii. In the context of the General Data Protection Regulation, JGL Strategic Solutions is a data controller.

## 2. A SUMMARY OF THE PERSONAL DATA WE PROCESS

### A. FROM YOU AS A VISITOR OF THIS WEBSITE

- i. First and last name
- ii. Phone number
- iii. E-mail address
- iv. Other personal data that you actively provide
- v. Location
- vi. Data about your activities on our website
- vii. IP address
- viii. Type of browser and device

## 3. SENSITIVE PERSONAL DATA WE PROCESS

### A. MINORS

- i. Our website and services do not intend to collect data about visitors who are under the age of 16, with the exception of given permission from parents or guardians. JGL Strategic Solutions cannot check if a visitor is older than the age of 16, therefore we advise parents to be involved in the online activities of their children. This way, we can prevent data on children from being collected without parental consent.

### B. PLEASE CONTACT US IF WE HAVE DONE SOMETHING WRONG

- i. If you are convinced that we have collected personal data about a minor without the aforementioned consent, please contact us via [info@vivacity-funds.lu](mailto:info@vivacity-funds.lu). We will delete the data immediately.

## **4. WHY WE NEED YOUR DATA AND FOR HOW LONG**

### **A. JGL STRATEGIC SOLUTIONS PROCESSES YOUR PERSONAL DATA WITH THE FOLLOWING PURPOSES:**

- i. To be able to e-mail you when this is necessary to provide our services;
- ii. To send you requested information as a result of filling out the contact form and finally;
- iii. To analyse your behaviour on the website in order to improve our website and to adjust it to your preferences.

### **B. THE DURATION FOR WHICH WE STORE YOUR DATA**

- i. JGL Strategic Solutions will not store your personal data any longer than necessary to achieve the purposes for which your data is collected. If you would like information about our retention periods in your specific case, please contact: [info@vivacity-funds.lu](mailto:info@vivacity-funds.lu).

## **5. SHARING WITH OTHERS**

- i. Except for the cookies that we use, as included in our cookie statement, the data that we collect from you on this website will not be processed by third parties.

## **6. MAPPING OUT YOUR VISIT OF OUR WEBSITE**

### **A. COOKIES**

- i. A cookie is a small text file that is stored by the browser of your computer, tablet or smartphone when you first visit this website.
- ii. JGL Strategic Solutions uses different types of cookies:
  - a. Functional cookies: These are cookies with a purely technical functionality. These ensure that the website works properly, so that it can, for example, remember your preferred settings. Using these, we can also optimize our website and the services through our website.
  - b. Analytic cookies by third parties: These cookies can keep track of your online behaviour. These cookies are placed when using analytical service providers, such as Google Analytics.
  - c. Tracking cookies: These cookies are placed by an external party. By reading these cookies the advertiser recognizes you when you visit a site in which he is also involved. If you continue browsing, personalized ads can be shown. These cookies can also keep track of your online behaviour, which may result in a very specific profile being built by these parties. This profile can be so detailed that it is considered personal data.

### **B. COOKIE NOTIFICATION AND WHAT TO DO WHEN YOU DON'T LIKE COOKIES**

- i. Your cookie settings were set by you on your first visit to our website. All non-functional cookies can be denied per category. Placement of cookies, other than functional or anonymous analytical cookies, takes place only after an active action by you as a visitor. You can change your settings at any time via our website.

## **7. ACCESSING, ADJUSTING OR DELETING YOUR DATA**

### **A. YOUR RIGHTS**

- i. You have the right to
  - a. access your personal data,
  - b. request an adjustment of your data
  - c. request that less of your data be processed by us,
  - d. apply for the removal of your data,
  - e. have your data transferred to someone else and
  - f. file a complaint as described in article 8.
- ii. If you have any questions or comments about the way JGL Strategic Solutions processes your data, please send them to [info@vivacity-funds.lu](mailto:info@vivacity-funds.lu).
- iii. JGL Strategic Solutions wants to be sure that the request has been made by you. That is why we kindly ask that you, along with your request for access, correction or removal, send us a copy of your ID. To protect your privacy, JGL Strategic Solutions asks you to **black out** your photo, MRZ (machine readable zone, the strip with numbers at the bottom of the passport), document number and citizen service number/social security number in this copy.
- iv. JGL Strategic Solutions will respond to your request as soon as possible, but at least within four weeks.

## **8. RIGHT TO COMPLAIN**

### **A. INTERNAL HANDLING**

- i. If you have any complaints about the processing of (personal) data, JGL Strategic Solutions would like to clear the air with you in mutual consultation. Please send your complaint to [info@vivacity-funds.lu](mailto:info@vivacity-funds.lu).

### **B. DATA PROTECTION AUTHORITY**

- i. Based on the General Data Protection Regulation, you have the right to submit a complaint to your own Data Protection Authority about our processing of your personal data. You can contact the lead supervisory authority of JGL Strategic Solutions, which is the Dutch DPA (Autoriteit Persoonsgegevens). For more information on your right to complain, please visit the Dutch DPA's website: <https://autoriteitpersoonsgegevens.nl/en>.

## **9. SECURE CONNECTION USING SSL - ENCRYPTION**

### **A. SSL**

- i. To protect you as a website visitor, JGL Strategic Solutions uses secure encryption technologies. Using SSL (Secure Socket Layer) your personal data is encrypted (not visible to third parties) on our site. This way, you can be sure that your data will only be visible to you and our server.

### **B. HOW CAN I IDENTIFY THE SECURE CONNECTION?**

- i. We use SSL-encryption on all parts of our site where your data is used, such as when filling out the contact form. You can check and recognize this yourself. When you are on an encrypted part of our site, you will see a (green) lock symbol appearing in the lower-right or top-left corner of your browser. In addition, the URL of <http://> changes to <https://> which also indicates that the page is secure.

## **10. SECURITY AND VERSION**

### **A. SECURITY**

- i. JGL Strategic Solutions takes the protection of your data very seriously and therefore takes appropriate measures to prevent misuse, loss, illegal access, unwanted disclosure and unauthorized modification. If you feel that your data is not properly secured or if there are indications of abuse, please contact us directly at [info@vivacity-funds.lu](mailto:info@vivacity-funds.lu)

## **11. QUESTIONS**

### **A. CONTACTPERSON**

- i. JGL Strategic Solutions has appointed Roger Ten Raa as the person responsible in the area of GDPR. When you have remarks regarding this privacy statement or you have general questions regarding the GDPR, you can contact us via [info@vivacity-funds.lu](mailto:info@vivacity-funds.lu)