



Data Privacy Policy

2025

CRESVIA CAPITAL FUND MANAGEMEN

(hereafter "Company")

2, rue Jean Monnet

L-2180 Luxembourg

1. Obligations When Collecting Personal Data

As the data controller, we are committed to ensuring the security and protection of your personal data when using our services. We take data protection very seriously and fully comply with German and European data protection regulations.

This policy explains how we process your personal data when you interact with us and our employees. For details on data processing on our website, please refer to <https://cresvia-capital.de/datenschutz>.

For readability, the generic masculine form is used throughout this document. However, it is intended to be gender-neutral.

2. Name and Contact Details of the Controller

The entity responsible for data processing is:

Cresvia Capital Fund Management ("Cresvia Capital")
2, rue Jean Monnet
L-2180 Luxembourg
Luxembourg

3. Contact Details of the Data Protection Officer

Thorsten Steffen
2, rue Jean Monnet
L-2180 Luxembourg
Email: compliance@cresvia-capital.com

4. Purpose and Legal Basis of Processing

4.1 Data Collection and Processing

Cresvia Capital collects and processes data from individuals interested in its services through various channels and sources. The personal data processed for contact purposes includes:

- First and last name

- Salutation
- Email address
- Position in the company and department
- Address
- Assigned role within the platform and related permissions
- Any personal data provided during customer communication
- Mobile phone number
- Landline number

4.2 Sources of Data Collection

We obtain data from:

- Publicly accessible sources
- Direct inquiries addressed to us
- Messages to Cresvia Capital employees via email, LinkedIn, Xing, or other communication channels
- Data collected at trade fairs and events for contact purposes
- Research through industry directories, company websites, and professional networks

4.3 Purpose of Data Processing

Personal data is processed for the following purposes:

- Providing information about the services of Cresvia Capital Group and 360 Operator GmbH
- Creating offers and processing inquiries
- Preparing and executing pre-contractual measures
- Establishing, executing, or terminating contractual relationships
- Maintaining customer databases and managing creditworthiness checks
- Fulfilling contractual obligations
- Managing contacts and customer relations
- Direct marketing via calls and emails
- Generating invoices

- Complying with post-contractual obligations
- Exercising or defending legal claims

Data collection is based on legitimate interest, balancing affected individuals' rights with Cresvia Capital's business interests. Consent for further communication is obtained orally and stored in our CRM system.

4.4 Data Processors Involved

Cresvia Capital uses **Salesforce** for customer relationship and inquiry management. Data may be transferred to Salesforce servers in the USA under **Binding Corporate Rules (BCRs)**. More details can be found at [Salesforce Privacy Policy](#).

5. Legal Basis for Processing

Your personal data is processed under the following legal grounds:

- **Processing of prospect data:**
 - Article 6(1)(a) GDPR – Consent
 - Article 6(1)(b) GDPR – Contractual necessity
 - Article 6(1)(f) GDPR – Legitimate interest
- **Processing of customer data:**
 - Article 6(1)(b) GDPR – Contractual necessity
 - Article 6(1)(f) GDPR – Legitimate interest
- **Processing of supplier/service provider data:**
 - Article 6(1)(b) GDPR – Contractual necessity
 - Article 6(1)(f) GDPR – Legitimate interest

6. Recipients of Personal Data

Your personal data may be shared with:

- Data processors

- Affiliated companies
- Third parties
- Authorities (e.g., tax offices, courts, regulatory agencies)
- Billing partners
- Banks
- Logistics and postal service providers
- Tax consultants
- Auditors

7. Data Transfers to Third Countries

Personal data is generally stored on servers within the EU. However, some service providers, such as Salesforce, process data outside the EU (e.g., in the USA). To ensure data protection, appropriate contractual safeguards, including **Standard Contractual Clauses (SCCs)**, are in place.

8. Data Retention Period

We retain personal data only as long as necessary for its intended purpose. Data will be deleted once it is no longer required. The retention period depends on:

1. The duration necessary for service provision
2. Legal, contractual, or regulatory obligations requiring retention
3. Retention due to contractual obligations, warranty, or legal claims

Data subject to statutory retention obligations (e.g., tax laws, commercial regulations) may be stored for up to **10 years**.

9. Rights of Data Subjects

Under the GDPR, you have the following rights:

- **Right of access (Art. 15 GDPR):** Request details on stored personal data.
- **Right to rectification (Art. 16 GDPR):** Request correction of inaccurate data.
- **Right to erasure (Art. 17 GDPR):** Request deletion of personal data under certain conditions.
- **Right to restriction of processing (Art. 18 GDPR):** Request processing restrictions.
- **Right to data portability (Art. 20 GDPR):** Request transfer of data in a structured format.
- **Right to object to processing (Art. 21 GDPR):** Object to direct marketing and profiling.

If you object to direct marketing, your data will no longer be used for such purposes.

You also have the right to file a complaint with the **Luxembourg National Commission for Data Protection (CNPD)**:

CNPD Contact Details:

Website: <https://cnpd.public.lu>

Address: 15, Boulevard du Jazz, L-4370 Belvaux, Luxembourg

Email: info@cnpd.com

Phone: +352 26 10 60-1

Fax: +352 26 10 60 29

10. Right to Withdraw Consent

If you have given consent for data processing, you may withdraw it at any time. The withdrawal does not affect the lawfulness of data processing before withdrawal.

11. Updates to This Policy

This Privacy Policy may be updated from time to time. Any changes will be published as a new version on our website.