Carrera Finance
SA · LUXEMBOURG

22-24, Boulevard Royal, L-2449 Ville-Haute
official@carrera-capital.at
www.carrera-capital.at
UID LURCSL.B175289 · LEI 52990025NF4XF55YSG18

Confidential — for the addressee only

Privacy Policy

Carrera Finance SA — Data Protection Notice

Effective date: 15 January 2026 · Luxembourg

1. Data Controller

Carrera Finance SA, 22-24, Boulevard Royal, L-2449 Ville-Haute, Luxembourg, is the data controller responsible for processing your personal data. For inquiries, contact official@carrera-capital.at.

UID: LURCSL.B175289 | LEI: 52990025NF4XF55YSG18 | Regulator: CSSF (portfolio manager (independent asset manager))

2. Legal Basis

We process personal data in compliance with the General Data Protection Regulation (GDPR) and under the supervision of the Luxembourg Commission for Supervision of Financial Sector.

Data processing is necessary for the performance of the asset management agreement and to comply with legal obligations (AML, tax reporting, regulatory reporting).

3. Data We Collect

(a) Identification data: full name, date of birth, nationality, ID documents (KYC).

(b) Contact data: address, email, phone number.

(c) Financial data: details of the account at the custodian bank (Julius Bär & Co. AG), transaction history, portfolio holdings, source of funds.

(d) Technical data: IP address, login times, device information (for security).

4. How We Use Data

To provide asset management services: manage portfolios, transmit instructions to your custodian bank (Julius Bär & Co. AG), provide reporting.

To comply with legal obligations: AML/KYC checks, tax reporting (CRS, FATCA), regulatory reporting to CSSF and the supervisory organisation.

To protect our systems: fraud prevention, security monitoring, audit trails.

5. Data Sharing

We do not sell or rent personal data. Data is shared only when necessary:

(a) With your custodian bank (Julius Bär & Co. AG) and regulated trading venues (to execute and settle transactions).

(b) With regulators, the supervisory organisation, and tax authorities (as required by law).

(c) With professional advisors (auditors, lawyers) under confidentiality obligations.

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6. Data Storage and Security

Data is stored in Luxembourg in secure data centres. We use encryption, access controls, and regular security audits.

Personal data is retained for the duration of the client relationship plus 10 years (legal record-keeping requirements).

7. Your Rights

You have the right to: (a) access your data; (b) correct inaccurate data; (c) request deletion (subject to legal retention requirements); (d) object to processing; (e) lodge a complaint with the Commission Nationale pour la Protection des Données (CNPD).

This document is provided for information purposes only. It is not a certificate of authenticity and bears no official seal, signature or stamp. The current version and the regulatory status of the Company can be verified in the public CSSF register and on the official company website.

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