



# PRIVACY POLICY

ACM EUROPE LIMITED  
NAVIGATE FUNDS SICAV P.L.C.  
PRIVACY POLICY 2024

**ACMEL Address**  
NU BIS CENTRE,  
Triq il- Mosta  
LIJA  
LJA 9012  
Malta

# PRIVACY POLICY

This privacy policy sets out how ACM EUROPE LIMITED and NAVIGATE FUNDS P.L.C. as Controller of the Information uses and protects any information that you give us when you use this website.

We are committed to ensuring that your privacy is protected. Should you provide us with any personal information when using this website, you can be assured that it will only be used in accordance with this Privacy Policy.

If you opened an Account with us before 1st February 2024, our Custodian, SEI Investments (Europe) Limited and our custody agent, Fusion Wealth Limited may also be a Data Controller in relation to your personal data processed using the ARIA Investment Platform Service. For more information on how SEI Investments (Europe) Limited process your personal data, you can review their policy here: SEI GDPR Privacy Notice. For more information on how Fusion Wealth Limited process your personal data, you can review their policy here: Fusion Privacy Policy.

If you open an Account with us after 1st February 2024, our Custodian, Interactive Brokers Ireland Limited may also be a Data Controller in relation to your personal data processed using ARIA Investment Platform Service. For more information on how Interactive Brokers Ireland Limited process your personal data, you can review their policy here: <https://www.interactivebrokers.co.uk/en/accounts/legalDocuments/privacy.php>

Please note that by clicking on these links, you will be taken to the websites provided by third parties over which We have no control and which will be subject to separate terms and conditions.

When you supply any personal information to us we will meet our legal obligations to you in the way that we deal with that information. In accordance with the applicable laws and regulations, we are required to collect the information fairly and to let you know how we will use it and whether we will pass the information on to anyone else (see below We may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes.

## 1. WHAT DATA DO WE COLLECT AND PROCESS ON THIS WEBSITE?

We may collect and process the following data about you:

1. Details of your visits to this site for traffic overview. This information is collected in line with our Cookie Policy.
2. Information that you provide by filling in your details in the Contact form.
3. Information that you provide when you communicate with us by any means.

### We will collect only the personal data for agreed purposes.

For the purpose of opening an account with us or providing investment services by us, we will request the personal data from you. We are also obliged to comply with the laws and regulations related to anti-money laundering, counter terrorist financing and other financial crimes. We process many categories of personal data, including as appropriate for the services we are providing to you:

- Contact details, such as your title, name, residential address, email address, telephone number.
- Investments and other financial and transactional data, such as bank account information.
- Other personal data such as date of birth, Tax Identification Number, passport number and any information provided to Us as part of declarations, platform agreement, subscription forms or by filling in any forms.
- Record of correspondence and communication with you as required by various regulations in relation to provision of financial services.
- Details of your access to certain ACMEI services, including your IP address, information viewed or searched for, page response times, lengths of visit, login information, browser type and version, traffic data, location data, weblogs and other communication data, and the resources that you access, so We may compile statistics relating to your use of ACMEI service.

For certain services provided by us, the provision of your full name, postcode, e-mail address, date of birth, tax identification number, primary passport country, nationality and country of birth, together with confirmation of whether you are a US Person (as defined in the ACMEI Terms and Conditions) and/or a PEP are all required from you in order to register you on ACMEI.

- When submitting general enquiries, your name and e-mail address are required from you to enable Us to respond to your enquiry.
- We will inform you at the point of collecting information from you, whether you are required to provide any other information to Us.
- If we start to collect any other data that is not in line with the above, this Privacy Policy shall be updated.

## 2. WHY DO WE COLLECT THIS DATA?

We may use your personal information for the following purposes:

1. We may use personal information collected about you from any applications or forms you may complete for the purposes of establishing a client relationship with you.
2. We may also use the information we collect in order to inform you about changes to this website.
3. We may also use the information to respond to your enquiries or comments submitted through the website.

Your information may be used for legal and regulatory compliance purposes, including as necessary: to respond to governmental or regulatory entities requests; to comply with our legal obligations under current Anti-Money Laundering Laws and Regulations and current local and international tax Laws including the Common Reporting Standards and the Foreign Account Tax Compliance Act in relation to the exchange and automatic forwarding of tax related information; to identify misuse of our systems and any fraud or other illegal or unlawful activity or any other activity which is or may be contrary to our legal and regulatory compliance obligations.

If we start to collect any other data for purposes that are not in line with the above, this Privacy Policy shall be updated.

## 3. MARKETING

In addition to the above uses We may use your personal data to notify you about additional services provided by us which may be of interest to you. For such uses We will only contact you by electronic means (e-mail) if you have provided Us with your email address when We collect your personal data.

If you do not want Us to use your personal data in this way please either (i) tick the relevant box situated on the form or page on which We collect your personal data (for example, a registration form or a website page); (ii) unsubscribe from our electronic communications using the method indicated in the relevant communication; or (iii) inform Us at any time by contacting Us at the contact details set out below.

## COOKIES

ACMEL uses cookies to help provide the best website experience and make our website easy to use.

A cookie is a small text file that is downloaded onto your device (like a tablet or computer) when you access our website. It allows our website to recognise your device and store some information on your preferences and past actions.

Where you are a person who has not attained the required age to provide valid consent to the processing of your personal data (as determined by applicable law), any processing of your personal data will be subject to the consent of your appointed legal guardian.

This website uses cookies. We use cookies to personalise content and ads, to provide social media features and to analyse our traffic. We also share information about your use of our site with our social media, advertising and analytics partners who may combine it with other information that you've provided to them or that they've collected from your use of their services.

Cookies are small text files that can be used by websites to make a user's experience more efficient.

The law states that we can store cookies on your device if they are strictly necessary for the operation of this site. For all other types of cookies we need your permission.

This site uses different types of cookies. Some cookies are placed by third party services that appear on our pages.

You can at any time change or withdraw your consent from the Cookie Declaration on our website.

Learn more about who we are, how you can contact us and how we process personal data in our Privacy Policy.

Please state your consent ID and date when you contact us regarding your consent.

Your consent applies to the following domains: ariacm.com

Cookie declaration last updated on 02/04/2024 by Cookiebot:

**Necessary (7)**

Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies

Name	Provider	Purpose	Expiry	Type
grecaptcha	Google	"This cookie is used to distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website."	Persistent	HTML Local Storage
GRECAPTCHA	Google	"This cookie is used to distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website."	180 days	HTTP Cookie
CookieConsent	ariacm.com	Stores the user's cookie consent state for the current domain	1 year	HTTP Cookie
re::a	Google	"This cookie is used to distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website."	Persistent	HTML Local Storage
rc::b	Google	This cookie is used to distinguish between humans and bots.	Session	HTML Local Storage
rc::c	Google	This cookie is used to distinguish between humans and bots.	Session	HTML Local Storage
rc::d-15#	Google	This cookie is used to distinguish between humans and bots.	Persistent	HTML Local Storage

**Statistics (8)**

Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.

Name	Provider	Purpose	Expiry	Type
clk	Microsoft	"Collects data on the user's navigation and behavior on the website. This is used to compile statistical reports and heatmaps for the website owner."	1 year	HTTP Cookie
clsk	Microsoft	"Registers statistical data on users' behaviour on the website. Used for internal analytics by the website operator."	1 day	HTTP Cookie
cltk	Microsoft	"Registers statistical data on users' behaviour on the website. Used for internal analytics by the website operator."	Session	HTML Local Storage
_ga	Google	"Registers a unique ID that is used to generate statistical data on how the visitor uses the website."	2 years	HTTP Cookie
_ga_ #	Google	"Used by Google Analytics to collect data on the number of times a user has visited the website as well as dates for the first and most recent visit."	2 years	HTTP Cookie
c.gif	Microsoft	"Collects data on the user's navigation and behavior on the website. This is used to compile statistical reports and heatmaps for the website owner."	Session	Pixel Tracker
CLID	Microsoft	"Collects data on the user's navigation and behavior on the website. This is used to compile statistical reports and heatmaps for the website owner."	1 year	HTTP Cookie
td	Google	"Registers statistical data on users' behaviour on the website. Used for internal analytics by the website operator."	Session	Pixel Tracker

**Marketing (9)**

Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

Name	Provider	Purpose	Expiry	Type
ANONCHK	Microsoft	"Registers data on visitors from multiple visits and on multiple websites. This information is used to measure the efficiency of advertisement on websites."	1 day	HTTP Cookie
MR [x2]	Microsoft	"Used to track visitors on multiple websites, in order to present relevant advertisement based on the visitor's preferences."	7 days	HTTP Cookie
MUID [x2]	Microsoft	Pending	1 year	HTTP Cookie
rc::f	Google	This cookie is used to distinguish between humans and bots.	Persistent	HTML Local Storage
SM	Microsoft	"Registers a unique ID that identifies the user's device during return visits across websites that use the same ad network. The ID is used to allow targeted ads."	Session	HTTP Cookie
SRM_B	Microsoft	"Tracks the user's interaction with the website's search-bar-function. This data can be used to present the user with relevant products or services."	1 year	HTTP Cookie

## THIRD PARTY MARKETING

We will not sell, share or pass your personal data to a third party for marketing purposes unless you have expressly consented to Us doing so.

If you do not wish to be contacted about or receive marketing information from us send an e-mail to [admin@ariacm.com](mailto:admin@ariacm.com) or write to The Data Protection Officer at the address set out above. Alternatively, please follow the unsubscribe link located within the e-mail marketing correspondence.

## 4. DATA RETENTION

Personal data will be retained for as long as it is necessary for the purposes set out above and in accordance with our legal and regulatory obligations.

## 5. WHERE WE STORE YOUR PERSONAL DATA

The data is stored on the servers located in the EU, United Kingdom and UAE.

## 6. DISCLOSURE OF INFORMATION

- We may disclose your personal data to external service providers for operational and compliance purposes, for example, if it is necessary to provide you with something which you have requested. These service providers include:
- Custodian and other financial services providers which we partner with in order to provide the services in line with our agreement with you. In addition to these, we may pass your personal data to our third party service providers, agents, subcontractors and associated organisations for the purposes of: (a) completing tasks and providing services to you on our behalf and (b) storing, protecting and securing your personal data.
- We may also disclose your personal data to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal or other regulatory obligation, including the orders of the FCA, MFSA or any court of competent jurisdiction and/or to protect our rights, property, or safety or that of our affiliated entities and our users and any third party we interact with to provide our services.
- IT Service Providers; and
- Google Analytics (a web analytics service provided by Google Inc, which uses the information to evaluate your use of the Site, compile reports on site activity and provide other site activity and internet related services); We may also transfer your data if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation. If we start to disclose data to any other party not in line with the above, this Privacy Policy shall be updated.

## 7. ERRORS AND OMISSIONS

If you believe that the information we hold on you is incorrect, please email [compliance@ariacm.com](mailto:compliance@ariacm.com)

We will review your record as soon as possible.

## 8. THIRD PARTY LINKS

On occasion we may include links to third party websites on this website. Once you have used these links to leave our site, we do not have any control over that other website. Therefore, we are not responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy policy. You should review the privacy policy of these websites before providing any personal data to them.

## 9. WHAT ARE YOUR RIGHTS?

- Right to Transparent Information - you have the right to be informed in a clear manner on any personal data pertaining to you that may be processed by us. Such information is being provided to you in this Privacy Policy.
- Right of Access to Information – you have the right to request confirmation from us whether personal data relating to you is being processed and if so to access such personal data.
- Right to Rectification – you have the right to request from us the rectification, without delay, of any inaccurate personal data pertaining to you.
- Right to Be Forgotten – you have the right to request from us the erasure of all personal data pertaining to you without delay, where the data has been processed with your consent as the basis for processing and/or where the processing is no longer lawful.
- Right to Restrict Processing – you have the right to request from us the restriction of processing if: processing is unlawful; you are contesting the accuracy of data; the data is no longer required by the controller but you require us to keep it in order to establish, exercise, or defend a legal claim; or if you have previously objected to the processing. Once data is restricted, we cannot process it in any way other than to store it unless: we have your consent; or if it is required for the establishment, exercise, or defence of legal claims; or if it is for the protection of the rights of other persons; or if it is for reasons of important public interest.

- Right to Data Portability – you have the right to receive from us personal data which you have provided to us and to transmit that data to another controller without hindrance from us. This right applies where the data is being processed with your consent, or for the performance of a contract, and when processing is carried out by automated means.
- Right to Object – you have the right to object at any time to the processing of personal data pertaining to you where the processing is based: on our legitimate interest; or the performance of a task in the public interest/exercise of official authority; or on direct marketing (including profiling); or on processing for purposes of scientific/historical research and statistics.

## 10. CONTACTING US AND COMPLAINTS

If you have any questions about our Privacy Policy or any other aspect of this website or any services provided by ARIA Capital Management or affiliated companies, please contact us at:

ACM EUROPE LIMITED, NU BIS CENTRE, Triq il- Mosta, LIJA, LJA 9012, Malta

Telephone: +356 2755 5069, E-mail: [compliance@ariacm.com](mailto:compliance@ariacm.com)

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred.

- The supervisory authority in Ireland is the Data Protection Commission who may be contacted at <https://www.dataprotection.ie/>
- The supervisory authority in Malta is the Office of the Information and Data Protection Commissioner who may be contacted at <https://idpc.org.mt/en/Pages/Home.aspx>
- The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

## How to reach us

**ACMEL Address**  
NU BIS CENTRE,  
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Malta

ACM EUROPE LIMITED. ACM EUROPE LIMITED is authorised and regulated by the Malta Financial Services Authority ([www.mfsa.mt](http://www.mfsa.mt)) and registered with the Central Bank of Ireland for conduct of business rules. Malta company number: C 26673. Registered office:NU BIS CENTRE, Triq il- Mosta, LIJA, LJA 9012, Malta

**Tel:** +356 2755 5069

**Email:** [admin@ariacm.com](mailto:admin@ariacm.com)

**Website:** [www.ariacm.com](http://www.ariacm.com)