

PRIVACY POLICY

Our Commitment to Privacy

This website, www.ecp.lu (the "Website"), is owned and operated by European Capital Partners (Luxembourg) SA ("ECP"). This Privacy Policy (the "Policy") describes how we collect, use and disclose information that we may obtain about you (the "Personal Information") through the Website. When you provide Personal Information to us via our Website, we protect it according to this Privacy Policy. By using this Website, you acknowledge that you have reviewed, and agreed to, the terms of this Privacy Policy. If you do not agree to this Privacy Policy, do not use this Website.

ECP adheres to the terms of applicable laws and regulations on the protection of persons with respect to the processing of personal data.

To the extent we collect information online, our purpose is to better serve our business customers.

The Personal Information ECP collects

We may collect the following types of information when you browse this Website, any other website, or any affiliate site:

- Personal Information you provide directly when you register or join an online community or other group, inquire about our services via any e-mail messages you send us, including personally identifiable information such as your name, contact information (phone, fax, address, and email address).
- Personal Information you provide directly, including personally identifiable information you submit through this Website as part of the online job application process or in the process of registering for an event, user group, or conference.
- Passively collected information, including through the use of "cookies" described below, such as IP addresses, web browser and operating system information, date and time of visits, and the web pages your Internet browser visits when browsing this Website, any other ECP website or any affiliate site; Click-through information related to ECP emails and related marketing activities; and Aggregate, non-personally identifiable information, such as the number of hits per week or per web page.

Cookies and Web Beacons

"Cookies" are small text files that store information about your interactions with a particular website, either temporarily (known as a "temporary" or "session" cookie, and deleted once you close your browser window) or more permanently on the hard drive of your computer (known as a "permanent" or "persistent cookie").

Cookies can make it easier to use a website by allowing servers to access certain information quickly. If cookies are disabled in your browser, you may not have access to the totality of our offers and services.

ECP may use "web beacon" technology to gather metrics from anonymous web users and email recipients for the purpose of operating and improving websites and email communications. A web beacon is an electronic image that is imbedded in a web page or email which allows to track web page views/hits or the opening of an email containing a beacon. ECP may use web beacon in conjunction with cookies to track web site activity the Website and associated websites. Web beacon tracking by ECP does not identify the name or email address of the web user or mail recipient.

Use of Personal Information

ECP uses Personal Information you have provided directly or information we collect indirectly online about you for marketing purposes in the following ways:

- For Personal Information you provide directly online, or through email messages, relating to inquiries about our services, we use the information to engage in and process transactions with you, to respond to your inquiries and requests, to provide information on our services, to provide information on ECP's partners offerings and to provide customer support activities. Before we use your Personal Information, we will give you the opportunity to choose whether or not you allow ECP to use your Personal Information in such ways described in this Privacy Policy. You may at any time choose to stop receiving ECP's emails relating to our marketing materials by following the unsubscribing instructions contained in the emails we send to your attention. You can also unsubscribe by sending an email to info@ecp.lu and requesting the removal of your name from our marketing lists.
- Some of ECP services may be advertised by third parties. We will only share your Personal Information if you have agreed to allow us to share your information with third parties. You have the opportunity to choose to not receive such marketing materials from third parties by updating your subscription preferences.
- ECP informs you that when you agree for your information to be shared and used by third parties, then these third parties are responsible for handling your information. Personal Information you provide online may be provided to third parties working on ECP's behalf, such as ECP partners, data processors, and advertisers. Therefore, we recommend that you familiarize yourself with their privacy policies available online so you understand how our partners will use, collect and handle your information.
- For Personal Information you provide online, including actions or clicks from hyperlinks and subscriptions, we may use the information to customize future communications and web pages in accordance with communication preferences you have established with us.

- For Personal Information about web pages visited, page hits per week, and the like, we use this information internally to improve the design of our web pages.
- For Personal Information submitted using the online job application process, we may use and disseminate this information internally and among our affiliates as necessary to consider your application and to contact you regarding our decision.
- For Personal Information submitted online for registering to attend a sponsored conference or event, we may use and disseminate this information internally and among our affiliates to communicate with you and to facilitate your registration and participation.

Sharing of your Personal Information

ECP shares information for business and marketing purposes only on a need-to-know basis and only with: (I) our own employees, contingent workers, and worldwide offices as listed here: ECP (II) ECP 's subcontractors, consultants, and third-party service-provider companies, that have agreed to safeguard such information in a like manner to the way that safeguards such information and that have agreed to confidentiality terms with us or that have entered into arrangements with us to provide the services described in this privacy policy; and (II) other entities authorized to have access to such information under applicable law or regulation.

ECP may disclose your Personal Information to protect our rights or property, to enforce our terms of use and legal notices, as required or permitted by law, or at the request of government regulators or other law enforcement officials and the courts. We shall have no duty to notify you of such compliance with local law.

ECP will not use or share your Personal Information in ways unrelated to those described above without first notifying you and offering you a choice as to whether or not we may use your Personal Information in a different manner.

ECP does not share non-public personally identifiable information with third party marketers.

Our Commitment to Data Integrity and Security

ECP is committed to protecting your privacy. ECP processes your Personal Information only in ways compatible with the purpose for which it was collected. To the extent necessary for such purposes, we take reasonable steps to make sure that the information is accurate, complete, current and otherwise reliable with regard to its intended use. However, ECP expects that you will update your personal information with ECP as necessary.

ECP takes reasonable and appropriate measures to maintain the confidentiality and integrity, and prevent the unauthorized use or disclosure, of information. This includes maintaining a system of appropriate administrative, physical and technical safeguards to secure such information.

Links to Unaffiliated Third Party Websites

This Website may contain links to affiliated and unaffiliated third party websites. If you link to or otherwise visit any other websites managed by third parties, ECP encourages you to review the privacy policies that may be available on these websites. You understand that ECP has no control over those websites and is not responsible or liable for the policies and practices followed by such third parties.

How you can Access or Correct your Personal Information

If you have created an online profile with us, you can update your profile by logging on and following the prompts to update your Personal Information.

You can also request access to your personally identifiable information that we collect online and maintain, and update or correct that information, through e-mailing ECP. To protect your privacy and security, we will take reasonable steps to verify your identity before granting access or making corrections.

We may keep information in an off-line form, for archival purposes or as otherwise required by law. Please note that if your information is removed from our databases, you may no longer be able to access certain areas of our website requiring registration or a subscription.

Users may request to be removed from our e-mail list, by following the "unsubscribe" instructions on e-mails from ECP or by sending a request to ECP.

Revisions and Contact Information

We periodically update the features of our Website to better serve you and all our customers. We reserve the right to change this Privacy Policy without advance notice and any modifications are effective when they are posted here. The date of the newest version will be posted below. Please check back frequently, especially before you submit any personally identifiable information at this Website, to see if the Privacy Policy has changed. By using our website, you indicate your understanding and acceptance of the terms of the Privacy Policy posted at the time of your use. If you have any questions, please contact us by sending an e-mail message to ECP (info@ecp.lu).

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