

Privacy Policy

Marathon SICAV-SIF (hereby the “Fund”) bases its corporate activity on the principles of legality, transparency and confidentiality, guaranteeing the trust of clients, employees and partners. With this document we aim to help you understand the processing practices of our Company regarding the personal data that are collected by us or communicated to us when you visit/use this website at www.marathonvalues.eu.

With the present policy we commit to the maintenance of strict confidentiality on the side of the Company regarding your personal data.

The processing and protection of the personal data of the visitor/user of our website is governed by the terms of this privacy policy and the provisions of the legal framework in respect to the protection of individuals from the processing of personal data.

Amendments to the policy

We retain the right to amend the current privacy policy with no prior notice, at any given time and for whichever reason, as for example, pursuant to a change in the legal framework. We advise you to periodically go over this policy for potential changes.

You agree that your access and use of this website following any and all amendments to this policy, constitutes your approval and acceptance of any amendment.

Processing of personal data

Data allowing the identification of persons

The Fund collects personal data when the visitor/user willingly provides them, through the contact form available on our website or the on-line registration to our blog, in order to serve its transactional relationship or to be informed about the services provided by the Fund and the improvement of those services. The personal data that can be collected and could contain: full name, e-mail address and alternative contact details.

In order to ensure the effectiveness of its website, the Fund automatically records data from the electronic equipment used, including the IP addresses of the visitors/users of the website, as well as data from “cookies”. The “cookies” do not have access to your computer nor are aware of any document or file on your computer. The “cookies” allows us to detect the manner of navigation of the visitors/users on our website.

The Fund is constantly doing its utmost so that the use of this data is carried out with the maximum of confidentiality possible, with professional diligence and in agreement with the legislation in force.

The Fund does not distribute, publicize, transfer or notify third parties about the personal data of the website’s users, unless it has the consent of the user, or has been imposed by a judicial or public authority and always in accordance with the current legislation.

The Fund is undertaking every appropriate, organizational and technical measure in order to ensure the confidentiality of the processing, the security of the data and its protection from any accidental or involuntary destruction, loss, alteration, prohibited dissemination or access and any other form of illicit processing. The Fund employs strict security measures, designed to deter unauthorized access to the visitors’/users’ data, including access to the data by Fund’s unauthorized employees.

General Data

We have the ability to record certain usage data, such as the number and frequency of visits to our website. The potential use of this statistical data will be only on an aggregate basis for the improvement of our website.

Service providers

It is possible that we will use external service providers, who will be responsible for the operation of our website. You are providing your consent for the possible access of those persons to data that you enter into our website and that could allow your identification. The Fund is undertaking every possible effort to make the current policy respected and implemented by its external partners. These individuals do not have the right to use data that would allow for the identification of users for any purpose other than the completion of the work or project that has been assigned to them and are committed to maintain discretion and confidentiality.

Electronic Mail and Marketing

The Fund will not distribute, publicize or disseminate the electronic addresses of the visitors/users, nor will provide personal data to third parties for use with the intention of promoting sales. We advise you to refrain from sending any personal data through unsafe means of correspondence, including public non-secured electronic means of communication, such as internet mail, which generally is not safe. Use the secure server that is made available at this website.

Third party websites

The Fund is neither responsible for third party websites that are connected with its website, nor for privacy policies and data provision policies that are applied by these third parties.

Security

The Fund is protecting your personal data upon entry to the website by demanding the use of internet browsing software that supports the generally accepted encryption standard SSL with a 128-bit key. The characterization "128-bit" refers to the length of the digital key used to encrypt the transferred data, keeping in mind that a longer digital key length represents increased security.

Personal Data protection, Rights of the Subject, Communication, Competent authority

If you have any questions regarding this privacy policy or the practices that are relevant to the processing of personal data, please contact us at the address info@marathonvalues.eu or at +352 20202231.

The subject of the data is aware that the Fund is processing personal data in accordance with the Law of the 1st of August 2018 establishing the National Commission for Data Protection and the implementation of Regulation (EU) 2016/679. The subject of the data is giving its express and unreserved consent to the processing of its personal data. Moreover, he expressly consents to the transfer of such data to third parties, as well as, the relevant public supervisory, tax and judicial authorities, if that is requested, in accordance always with the legal and regulatory provisions in force.

Every subject has the right, according to the law (Right to Access), to know whether his personal data are or have been processed, the purpose of their processing, the recipients and the progress of the processing since his last briefing. Furthermore, he has the right, according to the law (Right to Objection), to oppose at anytime he chooses the processing of the data that concern him, submitting a request to the Fund for a specific action, such as the correction, temporary suspension of use, freeze of use, non-transfer or deletion. For that purpose, any possible requests must be addressed in writing to the Company at the address 1, Place de Metz, L-1930 Luxembourg.

After contacting us, if you believe that your data protection rights have been infringed by us, you have the right to complain to the competent data protection authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement.

The competent data protection authority in Luxembourg is the Commission Nationale pour la Protection des Données (CNPD): 15, Boulevard du Jazz, L-4370 Belvaux - Tel: (+352) 26 10 60-1 - <https://cnpd.public.lu/en.html>.