

INTRODUCTORY DOCUMENT

WEALTH MANAGEMENT CONSULTING

Approved by the Association Nationale des Conseils Financiers (ANACOFI-CIF)

You have chosen to, or are about to, commission a regulated and inspected professional to provide you with advice and assistance.

This form is provided to you in accordance with the provisions of article 325-3 of the A.M.F.'s general regulations.

THE CONSULTANCY COMPANY

DTB Wealth Management SARL

Company with a capital of €1,000 having its registered office at
3 RUE DU CLOS DE LA MUSCADELLE, 81150 LAGRAVE,
registered in the RCS of ALBI with reference number 839 728 094,
NAF Code 6619B

represented in law by Daniel BUTCHER

Intracommunity VAT N°: FR10839728094

Carte T No.: CPI 8101 2018 000 032 896 issued on 29/07/2021 by
CCI TARN

ORIAS No.: 18004310

CIF No.: E008994

ASSISTED BY:

DANIEL BUTCHER

3 RUE DU CLOS DE LA MUSCADELLE

81150 LAGRAVE

Tel : 06 72 34 48 50

Mail: d.butcher@via-ap.com

- Financial Investment Adviser (CIF) (E008994)

- Insurance broker

- Broker

- Real estate agent

ORIAS No.: 18004310

LEGAL STATUTES AND REGULATORY AUTHORITIES

For your security, DTB Wealth Management's activity is subject to several strict legislative and regulatory frameworks. Your adviser is registered with the Single Register of Insurance, Banking and Finance Intermediaries (ORIAS) with registration number 18004310 for the following regulated activities (you can check this registration on the ORIAS website: <https://www.orias.fr/welcome>):

FINANCIAL INVESTMENT ADVISER

Financial investment adviser (CIF) authorised to provide independent investment advice within the meaning of Article 325-5 of the RGAMF, registered under no. E008994 with the Association Nationale des Conseils Financiers-CIF (ANACOFI-CIF), an association approved by the Autorité des Marchés Financiers (AMF, financial markets authority), whose postal address is 17 Place de la Bourse, 75082 Paris cedex 02, and whose website address is www.amf-france.org

INSURANCE INTERMEDIARY

As an insurance and reinsurance brokerage firm, DTB Wealth Management is positioned in category "A" meaning that it is not subject to any contractual obligation of exclusivity with any insurance company and is currently authorised primarily to present contracts from the insurance companies listed below. DTB Wealth Management is able to provide level 1 advice.

The role of insurance intermediary (IAS) is subject to monitoring by the Autorité de Contrôle Prudentiel et de Résolution (ACPR, prudential regulation and resolution authority) postal address: 4 Place de Budapest, 75436 PARIS cedex 09, and website: www.acpr.banque-france.fr/accueil.html

BANKING AND PAYMENT SERVICES INTERMEDIARY

Banking and payment services broker, mandated by whomever carries out intermediary services under a mandate from the client, with the exclusion of any mandate from a credit institution or payment institution, and who are not subject to a contractual obligation to work exclusively with any credit institution or payment institution. IOBSP business (*intermédiaire en opérations de banque et en services de paiement*/banking operations and payment services intermediary) is subject to monitoring by the Autorité de Contrôle Prudentiel et de Résolution (ACPR) postal address: 4 Place de Budapest, 75436 PARIS cedex 09, and website: www.acpr.banque-france.fr/accueil.html

As a banking operations and payment services intermediary, DTB Wealth Management SARL:

- is governed by articles L519-1 to L519-6 of the monetary and financial code and the subsequent related decrees and orders.
- complies with the provisions of the monetary and financial code arising from decree n°2012-101 and relating to the status of IOBSPs, in particular with regard to all the information to be provided to the Principal.
- is subject to supervision by the Autorité de Contrôle Prudentiel et de Résolution (ACPR), whose address is as follows: 61, rue Taitbout - 75436 Paris Cedex 09 - website: www.acpr.banque-france.fr, tel: 01.49.95.40.00.
- certifies that it is not under any contractual obligation to work with any credit institution and declares that it is not owned and does not hold voting rights or capital in any credit institution.
- declares that no credit or payment institution holds more than 10% of its capital or voting rights.
- declares that it does not hold more than 10% of the capital or voting rights of any credit or payment institution.
- declares that during the previous year not more than one third of its turnover was recorded with any credit institution as arising from intermediation activities.
- shall make available a list of the credit or payment institutions with which it works, as well as the conditions of its remuneration.

REAL ESTATE AND GOODWILL TRANSACTIONS

In accordance with the Hoguet law on real estate and business transactions, DTB Wealth Management holds the *carte professionnelle* (licence) for real estate and business transactions without holding funds N° CPI 8101 2018 000 032 896 issued on 29/07/2021 by the CCI TARN.

This activity is subject to inspection by the DGCCRF (direction générale de la concurrence, de la consommation et de la répression des fraudes/directorate general for competition, consumer affairs and repression of fraud).

IN ADDITION, YOUR ADVISER

- is a member of the Association Nationale des Conseils Financiers-CIF (ANACOFI-CIF). www.anacofi.asso.fr and has undertaken to comply fully with the ANACOFI-CIF code of good conduct available from the association's head office or on its website.
- In addition, DTB Wealth Management is obliged to comply with the legislation on combating money laundering and the financing of terrorism (TRACFIN measures). DTB Wealth Management undertakes to fully comply with the ANACOFI-CIF code of conduct available on the website www.anacofi.asso.fr.

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INSURANCE AND FINANCIAL GUARANTEES

DTB Wealth Management enjoys Financial Guarantee and Professional Civil Liability insurance cover provided by AIG 3 Rue du Clos de la Muscadelle policy N°12.401.395 / OC100000625 for all its activities, in accordance with the law and the ANACOFI-CIF code of good conduct. This cover complies with the requirements of the Monetary and Financial Code and the Insurance Code.

ACTIVITIES INSURED (RCP)	COVERAGE LIMITS per insurance period (1)
FINANCIAL INVESTMENT ADVICE (CIF) INCLUDING WEALTH MANAGEMENT ADVICE	€1,000,000 per insurance period without limit per claim
BANKING OPERATIONS INTERMEDIARY (IOB)	€500,000 per insurance period
FINANCIAL SERVICES INCLUDING ESTATE PLANNING ADVICE	€800,000 per insurance period
INSURANCE INTERMEDIARY	€3,000,000 Euros per insurance period without limit per claim
INTERMEDIARY IN BANKING & PAYMENT SERVICES, INCLUDING ESTATE PLANNING	€1,000,000 Euros per insurance period without limit / claim
ESTATE AGENT / TRANSACTIONS, INCLUDING ESTATE PLANNING	€250,000 Euros per insurance period
LEGAL ADVICE AND DRAFTING OF PRIVATE DEEDS PRACTISED WITHIN THE FRAMEWORK OF THE ACTIVITY OF WEALTH MANAGEMENT CONSULTANCY	€70,000

FINANCIAL GUARANTEE	GUARANTEE CEILINGS (per guarantee period)
REAL ESTATE AND BUSINESS GOODWILL TRANSATIONS WITHOUT HANDLING OF FUNDS	€110,000

Similarly, for all his activities and in accordance with the law, DANIEL BUTCHER is covered by financial guarantee and professional civil liability insurance provided by AIG sis Oria-Conseil (AIG) Tour CB 21-16 Place de l'Iris 92 040 Paris La Défense policy no. 12.401.395 / OC100000625

PRINCIPLE PARTNERS, COMPANIES AND SUPPLIERS

The names of any partners not included in this list with whom DTB Wealth Management has concluded an agreement or entered into a partnership will be provided upon request.

DTB Wealth Management certifies that it has no relationship of subordination (lien de subordination) or capital ties with any of the partners mentioned below.

DTB Wealth Management certifies that it has no financial links with and does not hold any direct or indirect shares in any credit, payment or electronic money institutions providing payment services and that it is not subject to any contractual obligation to work exclusively with any credit, payment or electronic money institutions providing payment services.

NAME	NATURE	TYPE OF AGREEMENT	MODE OF REMUNERATION
AGEAS	Insurance company	Brokerage agreement	Commission
AVIVA	Insurance company	Brokerage agreement	Commission
AXA	Insurance company	Brokerage agreement	Commission
INTENCIAL	Insurance company	Brokerage agreement	Commission
GENERALI	Insurance company	Brokerage agreement	Commission
ONE LIFE LUXEMBOURG	Insurance company	Brokerage agreement	Commission
SWISS LIFE	Insurance company	Brokerage agreement	Commission
UAFLIFE HERITAGE	Insurance company	Brokerage agreement	Commission
123 VENTURE	Management company	Terms of business	Commission
SOFIDY	Management company	Terms of business	Commission
PRIMONIAL	Management company	Terms of business	Commission
PERIAL	Management company	Terms of business	Commission
PAREF GESTION	Management company	Terms of business	Commission
VOISIN	Management company	Terms of business	Commission
ADVENIS	Management company	Terms of business	Commission
CORUM	Management company	Terms of business	Commission
FONCIA PIERRE MANAGEMENT	Management company	Terms of business	Commission
BANQUE POPULAIRE SO	Bank	Terms of business	Commission
BNP PARIBAS	Bank	Terms of business	Commission
CREDIT AGRICOLE	Bank	Terms of business	Commission
CAISSE D'EPARGNE	Bank	Terms of business	Commission
CREDIT AGRICOLE	Bank	Terms of business	Commission
SOCIETE GENERALE	Bank	Terms of business	Commission
BOUYGUES IMMOBILIER	Real estate developer	Terms of business	Commission
NEXITY	Real estate developer	Terms of business	Commission
CARRE DE L'HABITAT	Real estate developer	Terms of business	Commission
ACANTYS	Real estate developer	Terms of business	Commission
KAUFMAN & BROAD	Real estate developer	Terms of business	Commission
LP PROMOTION	Real estate developer	Terms of business	Commission
TRIANON	Real estate developer	Terms of business	Commission
ECOFIP	Provider under Girardin law on overseas investment	Terms of business	Commission
INTER INVEST	Provider under Girardin law on overseas investment	Terms of business	Commission
SIGMA	Private equity	Terms of business	Commission
ITC INTERNATIONAL PENSION	Trustee & QROPS	Terms of business	Commission
SOVEREIGN	Trustee & QROPS	Terms of business	Commission
AZURE PENSIONS SOVEREIGN	Trustee & QROPS	Terms of business	Commission
STM MALTA	Trustee & QROPS	Terms of business	Commission
PRUDENTIAL INTERNATIONAL	Insurer	Terms of business	Commission
PRAEMIUM	Asset Management Platform	Terms of business	Commission
CAPITAL INTERNATIONAL	Asset Management Platform	Terms of business	Commission
QUILTER INTERNATIONAL (UTMOST)	Insurer	Terms of business	Commission
TAM Asset Management EUROPE	Asset Management Platform	Terms of business	Commission

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NAME	NATURE	TYPE OF AGREEMENT	MODE OF REMUNERATION
BROOKS MAC DONALD	Asset Management company (DFM)	Terms of business	Commission
QUILTER CHEVIOT	Asset Management company (DAM)	Terms of business	Commission
GUINNESS Funds	Fund Management	Terms of business	Commission
RATHBONES	Asset Management company (DFM)	Terms of business	Commission
CASTELSTONE	Fund Management	Terms of business	Commission
SOVEREIGN UK			
(...) THIS LIST IS NOT EXHAUSTIVE			

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BILLING METHODS

DTB Wealth Management makes its money in two different ways. One or both methods may apply:

• **Invoicing of consulting fees** for our intellectual services: wealth assessments, legal or tax consultations, annual subscription for follow-up and support...

As advice is personalised in each case, our fees vary according to the specific features of the case and are always specified beforehand in a letter of engagement and accepted by you in complete transparency. For your information, our hourly rate is €150/hour before tax (€180 inc. tax).

and/or

• **The payment of commissions** by the partners with whom you choose to engage. These commissions are proportional to the value of the transactions carried out, and vary according to the type of investments made. As a reminder, the advice provided is not independent within the meaning of Article 325-5 of the RGAMF and is based on a broad analysis of different types of financial instruments.

Please note that when the consultation leads to an intermediation service between the Client and a provider, the adviser receives the establishment fees as remuneration from which he pays a share to the provider. He also receives a portion of the management fees at a maximum of 50% of those fees.

Please also note that in IOBSP projects, DTB Wealth Management is remunerated by its partners up to a maximum of 1% of the sums borrowed (percentage varies according to the nature of the loan and is subject to a ceiling).

As part of our customer support service, more precise information will be provided at a later date, on request, once the customer's choice of underlying assets is known.

Your adviser may receive non-monetary benefits from some of its suppliers such as shares or invitations to seminars, training or presentations. These benefits are intended to improve the quality of the advice provided and must not undermine our obligation to act in your best interests.

In all cases, the letter of engagement sent to you following the initial appointment serves as confirmation of the mode(s) and level of remuneration as well as the level of fees and expenses invoiced. No invoice will be issued without your prior validation.

In your interest and for your security, we never collect or hold any funds from you, other than our fees. All payments must be made to the order of our partners.

FORMS OF COMMUNICATION

- By phone
- By email
- By post
- In an in-person or online meeting

PROCESSING OF INFORMATION

In order for us to propose a project that meets your requirements, you will be asked to complete a questionnaire. DTB Wealth Management uses this questionnaire to gather personal data. In this respect, you are reminded that the purpose of processing personal data is to establish your current financial and asset situation to the extent necessary to provide you with a financial investment advice service in line with the needs you have expressed to us and to establish your profile accordingly. The information is also used to offer, customise and improve products and to communicate with you.

Pursuant to Article 325-9 of the AMF's General Regulations, the firm shall refrain, unless expressly agreed otherwise, from sharing and using information concerning its clients outside the scope of its mission. This provision may not stand in opposition to the role of the Association Nationale des Conseils Financiers as an inspection body.

DTB Wealth Management undertakes to collect and process personal data in accordance with the professional engagement entrusted to it and to preserve the security, integrity and confidentiality of such data by putting in place the technical and organisational, software and physical measures necessary to guarantee appropriate security against unauthorised or illicit processing, accidental loss, destruction, alteration or damage, and unauthorised access.

DTB Wealth Management undertakes to ensure that any person likely to be involved in the processing of the above-mentioned data complies with the same obligations of confidentiality and security of the processing of personal data. Data arising from this data collection are made available to: your adviser, the DTB Wealth Management team (assistant, back office manager, wealth management adviser) and our data hosts as well as any partners we may work with in order to meet your wealth management objectives.

Data arising from the data collection are kept for the duration of the provision of the service and, at the end of the contract for a maximum period of five (5) years in order to comply with a legal obligation to establish proof of a right or a contract.

DTB Wealth Management undertakes to alert you without delay in the event of any breach, loss or unauthorised disclosure of the personal data collected, and more generally to comply with its obligations under the EU Data Protection Regulation 2016/679.

You have the right to access, rectify, erase, limit, restrict and move your personal data and to oppose the processing of such data and you may, at any time, revoke your consent to such processing by sending an e-mail to contact@via-ap.com. You can also file a complaint about the processing of your data with the CNIL.

In addition, it is your responsibility to inform the natural persons whom the processing of this data may concern, namely, where appropriate, your spouse and your ascendant, collateral or descendant relatives.

If you do not respond to this consultancy agreement by signing an engagement letter within 6 months, all personal data collected will be immediately deleted in order to terminate all processing within the same period.

You are hereby informed that our company processes data for the purpose of combating money laundering and the financing of terrorism and that the Commission Nationale de l'Informatique et des Libertés (National Commission for Information Technology and Civil Liberties) has the right of access to data collected under application of Articles L.561-5 and L.561-23 of the French Monetary and Financial Code.

You expressly authorise your Bank to pass on information concerning you to your Adviser. In strict compliance with professional confidentiality, all documents and elements that you transmit to us will be treated with the utmost confidentiality and within the strict limitations of the specific project. You acknowledge that your Adviser is prohibited from receiving cash, bills, securities or cheques in bearer form or made payable to him.

Data Protection Officer: Daniel BUTCHER, e-mail address: d.butcher@via-ap.com

HANDLING OF COMPLAINTS

Article 323 of the RGAMF and AMF Instruction no. 2012-07 of 13/07/12 - amended 24/04/13, 20/11/13 and 17/10/2014 and 12/12/2016 with effect from 01/05/2017

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HOW THE COMPANY HANDLES COMPLAINTS

Your adviser undertakes to deal with your complaint within the following time limits:

- a maximum of ten working days from receipt of the complaint to acknowledgement of such receipt, unless the actual response is given to the customer within this period.
- a maximum of two months between the date of receipt of the complaint and the date on which the reply is sent to the customer, except in the event of duly justified special circumstances. In the case of any complaint, the complaints department can be contacted as follows:

By e-mail : d.butcher@via-ap.com

By post to: DTB Wealth Management - Claims Department, 3 RUE DU CLOS DE LA MUSCADELLE, 81150 LAGRAVE, FRANCE

REFERRING THE MATTER TO AN OMBUDSMAN

Ombudsman assigned to handle disputes with a company

Médiateur de l'ANACOFI
92 rue d'Amsterdam
75009 Paris

Ombudsman assigned to handle financial investment advice disputes with a consumer

Mme Marielle Cohen-Branche
Médiateur de l'AMF (Autorité des Marchés Financiers)
17, place de la Bourse
75082 Paris cedex 02

Website : <http://www.amf-france.org/Le-mediateur-de-l-AMF/Le-mediateur-mode-d-emploi/Modes-de-saisine.html>

Ombudsman assigned to handle insurance disputes with a consumer

La Médiation de l'Assurance
TSA 50110
75441 PARIS CEDEX 09

Website: <http://www.mediation-assurance.org/Saisir+le+mediateur>

Ombudsman assigned to handle IOBSP and real estate disputes with a consumer

Consumer mediation - ANM Conso
62 rue Tiquetonne
75002 PARIS

Website IOBSP: www.anm-conso.com/anacofi-iobsp
Website REAL ESTATE: www.anm-conso.com/anacofi-immo

DECLARATIONS

I, the undersigned ,

I, the undersigned , , , .

- expressly give my/our approval for DTB Wealth Management to use my/our personal data within the strict limits defined in the paragraph "Processing of Information". In accordance with Article 325-9 of the AMF's General Regulations, the company shall refrain from communicating and making use of information concerning its clients outside of its mission, unless express consent has been granted by the client.
- acknowledge(s) having read this Introductory Document.

Signed at _____ **Date**

THE CLIENT

DTB Wealth Management

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Security information and protection of your data

We ensure the confidentiality and security of your personal information and give you control.

We strive to protect all of our operations by exceeding the minimum standards required by law, and have rigorous and consistent policies and procedures in place.

This Privacy Statement seeks to inform you about our privacy practices and the choices you can make about the way we collect and use information about you, including information that may be collected from your online activity.

Your data is protected:

Security in the cloud is our number one priority and as a client, you benefit from a data centre and network architecture designed to meet the security requirements of the most demanding organisations. We implement all security measures necessary to protect us and our users from the unauthorised access, modification, disclosure or destruction of the data we hold. In particular:

- We encrypt most of our services using SSL technology using the HTTPS protocol. The SSL (Secure Sockets Layer) protocol guarantees that your searches are safer and more respectful of your privacy. SSL encrypts the connection between your computer and La Plateforme Patrimoniale to prevent third parties (such as Internet cafes, Internet service providers and Wi-Fi hotspots) from accessing your page and your login information. The servers where all the data is hosted are known as "dedicated servers". Only La Plateforme Patrimoniale, owner of the compartment and the object, originally has access to the Amazon S3 resources which it creates.
- Server-side encryption with encryption keys managed by Amazon S3 (SSE-S3) uses strong multi-factor encryption. Amazon S3 encrypts each object using a unique key. As an additional protection, it encrypts the key itself with a master key which is rotated regularly. Amazon S3's server-side encryption uses one of the strongest block ciphers available, 256-bit Advanced Encryption Standard (AES), to encrypt data.
- With SSE, each protected object is encrypted with a unique key. This object key is itself encrypted by a separate master key. A new master key is issued at least once a month. Encrypted data, encryption keys and master keys are stored and secured with separate hosts for multi-layered protection.
- Amazon S3 Standard and Standard - IA are designed to provide 99.999999999% object durability in any given year. This level of durability corresponds to an expected average annual loss of 0.000000001% of objects. For example, if you store 10,000 items with Amazon S3, you can expect to lose an average of one item once every 10,000,000 years. In addition, Amazon S3 is designed to deal with simultaneous data loss in two installations.
- The hosting provider conducts internal audits on the collection, storage and processing of data, including physical security measures, to prevent unauthorised access to the systems.
- Access to personal data is strictly reserved for LPP employees who need to access it in order to process it on our behalf. Such persons are subject to strict obligations of confidentiality and may be subject to disciplinary action up to and including dismissal in the event of failure to comply with these obligations.

Confidentiality is guaranteed:

- The information which you provide to us is protected by law:
- **Article 226-13 of the Code Pénal (criminal law)** (*Ordinance No. 2000-916 of 19 September 2000, Art. 3*)
 - **Article 226-22 of the Code Pénal** (*Law n°2004-801 of 6 August 2004 - Art. 14 JORF 7 August 2004*)
 - **Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016**

When you use our services, you trust us to process your data. The purpose of this Privacy Statement is to let you know what information we collect, why we collect it, and how we use it. These rules are important and we hope you will take the time to read them carefully.

Confidentiality rules :

You may use our services for a variety of reasons: to search for and share information, to communicate with others, or to create content. We are committed to keeping your private data confidential. We want you, as a user of our services, to understand how we use your data and how you can protect your privacy. If you have any questions, please do not hesitate to contact us.

Data we collect:

- We collect data in the following ways:
- **Information that you communicate to us:** to access our services, you must create a La Plateforme Patrimoniale account. In creating the account you provide personal information such as your name, e-mail address, telephone number or asset information which is stored with your account
 - **Information communicated by a third party:** certain third parties, professionals that you will have mandated, may populate your account database with data that you will have entrusted to them.

How we use the data we collect:

We process your personal data on dedicated servers located in a European country. Your personal data may therefore be processed on a server located outside your country of residence but within the framework of European regulations.

Transparency and freedom of choice :

Confidentiality concerns differ from person to person. We want to be transparent about how we collect and use information about you so that you have all the information you need to make informed choices. For example, you can perform the following actions:

- control who you share your data with through your account in the "My Advisers" tab;
- for professionals, adjust and modify the display of the profile associated with your account in the "My Profile" tab;
- delete all the data associated with your account in the "Unsubscribe" tab;
- export all your data in a usable digital format.

Data you share :

Our services offer you several ways to share and delete your content.

Consultation and updating of your personal data:

When you use our services, you have access to all your personal information.. If there are errors, we make sure that you can update them promptly or delete them, unless we need to keep them for purposes required by law. Access to and correction of data is a free service over which you have complete and instantaneous control.

Data we share:

We only pass on your personal data to companies, organisations or third parties under the following circumstances:

- Our services offer you several ways to share and delete your content.
- **With your consent:** We only pass on your personal data to third party companies, organisations or persons with your consent. We always ask for your permission before passing on personal data to third parties.
 - With engineers and domain administrators: Engineers and the domain administrator have access to your account data but in accordance with this Privacy Statement and in compliance with all appropriate security and confidentiality measures. Indeed, they have each made the same commitments as those described in this Privacy Statement.
 - For legal reasons: La Plateforme Patrimoniale undertakes only to depart from the rules governing the preservation of the confidentiality of the information and personal data at its disposal at the request of the supervisory authorities or the courts. In the event that La Plateforme Patrimoniale takes part in a merger, acquisition or any other form of asset disposal, we undertake to guarantee the confidentiality of your personal data and to inform you before it is transferred or subjected to new confidentiality rules.

Respect for and cooperation with regulatory bodies:

We regularly check that we comply with this Privacy Statement. We also comply with several self-regulation charters. When we receive a formal written complaint, we contact the user to follow up on it. We cooperate with the relevant authorities, including local data protection authorities, to resolve any disputes regarding the transfer of personal information that we cannot resolve directly with the user.

Modifications :

This Privacy Statement may change from time to time. Your rights under this Privacy Statement will not be diminished without your express consent. We will post any changes to the Privacy Statement on this page and, in the event of significant changes, we will post a prominent notice (including, for certain services, through e-mail notification). Previous versions of this Privacy Statement will be archived and made available to users.



Translated by Sonja MARKS-TERREY, member of the Société Française des Traduc

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