

## PRIVACY POLICY

Swiss Rock Asset Management AG

### 1. General

This privacy policy provides information on how Swiss Rock Asset Management AG ("Swiss Rock") processes personal data. Personal data" means any information relating to an identified or identifiable natural or legal person. Processing" means any handling of personal data, regardless of the means and procedures used, in particular the acquisition, storage, use, modification, disclosure, archiving, deletion or destruction of personal data.

For certain data processing, e.g. in the context of concluding contracts with Swiss Rock or in connection with Swiss Rock websites ("Swiss Rock websites"), further regulations (such as terms of use) exist. These are available in the corresponding contracts or on the corresponding websites. In addition, the General Terms and Conditions (GTC) contain general information on data protection, in particular in connection with the performance of contracts in Banking.

### 2. Data security

Swiss Rock is committed to protecting personal data and privacy in accordance with applicable laws, in particular banking secrecy and data protection laws. For this purpose, Swiss Rock takes various technical and organizational security measures (e.g. access restrictions, firewalls, personalized passwords as well as encryption and authentication technologies, training of employees, etc.).

### 3. Personal data categories

Swiss Rock processes the following categories of personal data. We always process as little personal data as possible. Data of the partners of Swiss Rock, such as

- Master and inventory data (e.g. name, address, nationality, date of birth, professional background)
- Technical data (e.g. business numbers, IP addresses, internal and external identifiers, access records)
- Marketing data (e.g., preferences, needs) Bank

customer data, such as:

- Master and inventory data (e.g. name, address, nationality, date of birth, tax number, information regarding accounts, securities accounts, concluded transactions and contracts, information about third parties affected by data processing, such as spouses, authorized representatives and advisors)
- Transaction or order and risk management data (e.g. information on beneficiaries of transfers, beneficiary bank, amount of transfers, risk and investment profile, information on investment products)
- Technical data (e.g. business numbers, IP addresses, internal and external identifiers, access records)
- Marketing data (e.g. preferences, needs)

Visitor and prospect data (e.g., visitors to Swiss Rock or Swiss Rock websites), such as:

- Master and inventory data (e.g. name, address, date of birth)
- Technical data (e.g. IP addresses, internal and external identifiers, access records)
- Marketing data (e.g. preferences, needs)

Supplier data, such as:

- Master data and inventory data (e.g. name, address, date of birth, information about concluded transactions and contracts)
- Technical data (e.g. IP addresses, internal and external identifiers, access records)

#### **4. Origin of personal data**

Swiss Rock may collect personal data from the following sources in order to fulfill the purposes set forth in Section 5:

- Personal data provided to Swiss Rock, e.g. when opening business relationships, in the course of processing contracts, when using products and services or on websites.
- Personal data that arises in connection with the use of products or services and is transmitted to Swiss Rock through the technical infrastructure or through processes based on the division of labor, e.g. in payment transactions, securities trading, eBanking, websites or on the occasion of cooperation with other financial or IT service providers, marketplaces and stock exchanges.
- Personal data from third-party sources, e.g. from authorities or sanctions lists of the UN and the EU.

#### **5. Processing purposes**

Swiss Rock may process personal data to provide its own services and for its own purposes or those provided for by law. In particular, the following should be considered:

- Conclusion and fulfillment of contracts, execution, processing and administration of products and services (e.g. accounting, tax returns, commercial register entries and changes, invoices, account openings, payments, financing, financial planning, investments, pension plans, insurance, consolidation).
- Monitoring and managing risks (e.g. investment profiles, anti-money laundering, limits, utilization ratios, market, credit or operational risks).
- Statistics, planning, business decisions (e.g. development of new or assessment of existing services, products, processes, technologies).
- Marketing, communicating, informing about and reviewing service offerings (e.g., print and online advertising, customer, prospect or other events, identifying future customer needs, assessing a customer, market or product potential).
- Fulfillment of legal or regulatory disclosure, information or reporting obligations to courts and authorities, fulfillment of official orders (e.g. reporting obligations to FINMA and foreign supervisory authorities, automatic exchange of information with foreign tax authorities, orders from public prosecutors in connection with money laundering and terrorist financing).
- Protecting the interests and securing the claims of Swiss Rock, e.g. in the event of claims against Swiss Rock or claims of Swiss Rock against third parties.

#### **6. Disclosure to third parties, categories of recipients**

Swiss Rock discloses customer data to the following third parties in the following cases:

- For outsourcing pursuant to Section 7 and for the purpose of comprehensive customer service to other service providers.
- For order execution, i.e. when products or services are used, e.g. to service providers, stock exchanges or marketplaces, reports of stock exchange transactions to (international) trade repositories.
- Due to legal obligations, legal justification or official orders, e.g. to courts, supervisory authorities, tax authorities or other third parties.
- To the extent necessary to protect the legitimate interests of Swiss Rock, e.g. in the event of legal action threatened or initiated by customers against Swiss Rock, in the event of public statements, to secure claims of Swiss Rock against customers or third parties, for the collection of claims of Swiss Rock, etc., Swiss Rock will not be liable for any such claims.

- With the consent of the data subjects to other third parties.

In particular, when using certain products or services of Swiss Rock, personal data may also have to be disclosed to third parties in countries that do not have an adequate level of data protection (e.g. USA). If a transfer to such a country is necessary, Swiss Rock will, if possible, take suitable precautions to continue to protect personal data appropriately.

## **7. Outsourcing of business areas or services (outsourcing)**

Swiss Rock outsources certain business areas and services in whole or in part to third parties (such as securities accounting, account management including payment transactions, IT systems, etc.). The service providers who process personal data on behalf of Swiss Rock for this purpose (so-called order processors) are carefully selected. Whenever possible, Swiss Rock uses order processors with a domicile in Switzerland. The order processors may be entitled to have certain services (e.g. electronic data processing, securities settlement, etc.) provided by third parties.

The contract processors may only process personal data received in the same way as Swiss Rock itself and are contractually obliged to ensure confidentiality, bank client secrecy and data security.

Outsourcing by Swiss Rock are carried out in accordance with the Circular Outsourcing Banks of the Swiss Financial Market Supervisory Authority (FINMA) as amended from time to time.

## **8. Automated decisions in individual cases including profiling**

Swiss Rock reserves the right to process customer data in the future, if necessary also automatically, in particular in order to identify essential personal characteristics of the customer, to predict developments and to create customer profiles. This serves in particular to review and further develop offers and to optimize the provision of services.

Swiss Rock ensures that a contact person is available if a data subject wishes to comment on an automated individual decision and such a possibility to comment is provided for by law.

## **9. Website use and cookie policy**

When a person visits Swiss Rock websites, the web server automatically records details of their visit (e.g. the website from which the visit is made, the visitor's IP address, the content of the Swiss Rock website that is accessed, including the date and duration of the visit). Such tracking data serves to optimize the Swiss Rock websites and provide information on how the visitor informs himself about and uses the products, services and offers of Swiss Rock. As a rule, however, they do not allow any conclusions to be drawn about the identity of the visitor. In this respect, no personal data is processed.

However, if the visitor provides personal data, e.g. by filling out a registration form or message field for newsletters, etc., Swiss Rock may use this data, in addition to the purposes mentioned in section 5, in particular for the following:

- for customer and user administration;
- to inform the visitor about services and products;
- for marketing purposes (e.g. sending newsletters);
- for the technical "hosting" and further development of the Swiss Rock websites.

When visiting Swiss Rock websites, the visitor's data is transported via the Internet, i.e. an open network accessible to anyone. Data transmitted via electronic media (including e-mail) cannot be effectively protected against access by third parties. This entails the risk that the data may be disclosed or its content changed, that the identity of the sender (e.g. e-mail) and the content of the message may be simulated or manipulated in some other way by unauthorized persons, that viruses may be released, or that technical transmission errors may occur,

This can lead to delays or interruptions, data being transferred uncontrolled abroad, where data protection requirements may be lower than in Switzerland, and so on.

By using the Swiss Rock websites, a visitor confirms his or her express agreement with this privacy policy and the risks mentioned.

In addition, by using the Swiss Rock website, a visitor agrees to the use of cookies. Cookies are small files that are stored on the visitor's computer to track the corresponding website visit and navigation between different pages and/or to save settings (e.g. selected language). Cookies are used to collect statistical data on the frequency and time of visits to individual website areas, and help to design tailored, useful and user-friendly websites. The visitor can decide against the use of cookies at any time by deleting the cookies set by the Swiss Rock website. Deletion is possible via the settings in the visitor's internet browser.

Occasionally, Swiss Rock uses third-party components (such as plug-ins) to enhance the user experience and online advertising campaigns. These components may also use cookies for similar purposes. Neither these third parties nor Swiss Rock have access to the data collected by the other via cookies. Finally, Swiss Rock also uses cookies in the context of Swiss Rock's advertisements on third-party websites with which Swiss Rock has marketing relationships. Where third parties collect anonymized information about the use of Swiss Rock websites and other websites, Swiss Rock may use this anonymized data to improve the effectiveness of its advertising.

This title of this privacy statement applies only to data that Swiss Rock receives as a result of the use of Swiss Rock websites. It does not apply to third party websites, even if the user accesses them via links on a Swiss Rock website. Swiss Rock has no influence on the content and data protection practices of third-party websites and cannot accept any responsibility for them.

## **10. Duration of storage**

The duration of the storage of personal data depends on the purpose of the respective data processing and/or statutory retention obligations, which amount to five, ten or more years depending on the applicable legal basis.

## **11. Rights of the data subjects**

Anyone can request information from Swiss Rock as to whether personal data about them is being processed. There is the right of objection, restriction of processing and, where applicable, the right to data portability. Incorrect data can be corrected. In addition, the deletion of personal data may be requested, unless legal or regulatory requirements (e.g. legal retention obligations of business-relevant data) or technical obstacles prevent this. The deletion of data may result in Swiss Rock no longer being able to provide certain services. In addition, where applicable, there is a right of appeal to a competent authority. Where Swiss Rock processes personal data on the basis of consent, this consent can be revoked at any time.

In order to assist Swiss Rock in responding to your inquiry, we request that you provide us with an appropriate, understandable message. We will review and respond to the concerns within a reasonable period of time.

## **12. Contact**

Swiss Rock is responsible for processing your personal data. The contact details of Swiss Rock are as follows:

Swiss Rock Asset Management  
AG Rigistrasse 60  
CH-8006 Zurich