

DATA PROTECTION POLICY

swisspartners Advisors Ltd. ("SPA") is a Registered Investment Adviser registered with the United States Securities and Exchange Commission that provides discretionary asset management services to U.S. clients. SPA is a wholly owned subsidiary of swisspartners Group AG.

If you have any questions about this Data Protection Policy, please contact us:

swisspartners Advisors Ltd.

Am Schanzengraben 23

8002 Zurich

Switzerland

Telephone: +41.58.200.0800

Email: info@swisspartners-advisors.com

The following Data Protection Policy provides an overview of how personal data held at swisspartners Advisors Ltd. may be processed and your rights in relation to this information based on the European Union's General Data Protection Regulation (GDPR). The processing of personal data will essentially depend on the services and products provided and/or have been agreed to in each case. SPA is legally obligated to protect your privacy and keep your information confidential and has implemented a range of technical and organizational measures to ensure data protection for all processing of personal data.

In the course of the business relationship with our clients, we will need to process personal data that are required for the purpose of setting up and conducting our business relationship, meeting applicable statutory or contractual requirements, providing services and executing orders. Without such data we would be unable to enter into or to maintain a business relationship, process orders, or offer our services and products.

1. Types of data collected and methods of collection

We collect and process personal data that we receive in the course of our business relationship with our clients. Personal data may be processed at any stage of the business relationship and may vary depending on the parties involved.

As a general rule, we process personal data that you provide when you submit agreements, forms, correspondence or other documents to SPA. We also process any personal data that may be required for the purpose of providing services to our clients. The data are generated or transmitted as a result of using our products and services or we have lawfully obtained from third parties such as, credit agencies and public authorities (e.g. sanctions lists), or by the affiliated companies within swisspartners Group. Finally, we may process personal data from publicly available sources such as debtor records, land registers, commercial registers and registers of associations, the media, or the Internet.

In addition to client data, we may, where appropriate, also process personal data of other third parties involved in the business relationship, including data pertaining to authorized agents, representatives, cardholders, parties jointly and severally liable for credit facilities, guarantors, legal successors or beneficial owners. Please ensure that such third parties are also aware of this Data Protection Policy.

The personal data we process include the following categories in particular:

- Personal information (e.g. name, date of birth, SSN, TIN, Passport or ID details, signature)
- Address and contact details (e.g. address, telephone number, e-mail address)
- Publicly available information (data from publicly available sources)
- Financial and background information (e.g. investment experience and investment profile, transactions, trades, source of wealth, source of assets, professional and personal background)
- correspondence (e.g. email or letters exchanged with you)

2. Purpose and legal basis for processing your personal data

SPA processes personal data in accordance with the provisions of the GDPR for the following purposes and on the following legal basis:

For the performance of a contract or to take steps prior to entering into a contract for providing asset management services or acting as intermediary in connection with asset management services provided by SPA. The purposes for which data are processed are to provide discretionary asset management to our clients. This includes but it is not limited to opening an account at SPA and at the chosen custodian bank, providing investment strategies, and carrying out transactions.

For compliance with a legal obligation or in the public interest, including compliance with statutory and regulatory requirements such as, but not limited to, compliance with the GDPR, the Securities Act, the Securities Exchange Act, the Investment Advisers Act, due diligence and anti-money laundering regulations, KYC, market abuse regulations, tax laws and agreements, control and reporting obligations, risk management, preventing and investigating criminal offences. If you do not provide us with the necessary data so that we can guarantee compliance with the applicable laws and regulations, we will be forced to terminate the business relationship.

For the purposes of legitimate interests pursued by SPA or by third parties (e.g. custodian banks) that have been specifically defined, including determining credit ratings, setting up and realizing collateral, pursuing claims, developing products, marketing and advertising, performing business checks and risk management, reporting, statistics and planning, marketing new services related to discretionary asset management.

In reliance on consent given by you for the performance of services and order requests or for one or more specific purposes. You have the right to withdraw your consent at any time. Once consent is withdrawn, the processing will be terminated from the date the consent was withdrawn. This does not affect the lawfulness of data processing undertaken before the consent was withdrawn.

We reserve the right to engage in the further processing of personal data, which we have collected for any of the foregoing purposes, including any other purposes that are consistent with the original purpose or which are permitted or prescribed by law (e.g. reporting obligations).

3. Access to your personal data and storage

The employees of SPA, certain employees of swisspartners Group companies, and service providers may have access to your personal data in order to process your data to the extent required for the purpose of performing our contractual, statutory and regulatory duties and pursuing SPA's legitimate interests. The service providers include companies that supply IT services, logistics, printing, debt collection, advisory, consultancy, distribution and marketing services. In this context, recipients of your data may also include other credit and financial services institutions or similar organizations to which we transfer personal data for the purposes of conducting the business relationship (e.g. custodian

banks, brokers, stock exchanges). Public bodies and organizations (e.g. supervisory authorities, tax authorities) may also receive your personal data where there is a statutory or regulatory obligation.

Personal data will only be transferred to countries outside the EU or EEA if:

- it is required for the purpose of taking steps prior to entering into a contract, performing a contract, supplying services or executing orders (e.g. executing payment orders and securities transactions);
- you have given us your consent;
- it is necessary for reasons of public interest (e.g. anti-money laundering compliance); or
- it is prescribed by law (e.g. tax disclosure obligations).

We process and store your personal data throughout the continuation of our business relationship unless there is a strict obligation to erase specific data at an earlier date. In addition, the length of time that data will be stored will depend on whether processing continues to be necessary for the same purpose that the data were collected or whether there is a legal obligation to maintain the data. Data will be erased at regular intervals of 10 years after the end of the business relationship when the data are no longer required for the purpose of fulfilling contractual or statutory duties or pursuing our legitimate interests. Data will be deleted immediately if you withdraw your consent, unless further processing is necessary for contractual or statutory retention periods or documentation requirements.

4. Automated decision making and profiling

We do not make decisions based solely on the automated processing of personal data. We will inform you separately in accordance with the statutory regulations of any intention to use this method in particular circumstances.

SPA reserves the right in future to analyze and evaluate client data (including the data of any third parties involved) by automated means for the purpose of identifying key personal characteristics in relation to clients, predicting developments and creating client profiles. Such data will be used to, inter alia, perform business checks, provide customized advice, offer products and services, or provide any information that SPA may wish to share with its clients.

5. Your rights and how to invoke them

Under the GDPR, you have the following data protection rights with respect to your personal data:

- **Right to Access:** you have the right to obtain from SPA a confirmation as to whether or not your personal information is being processed, and where that is the case, you can access your personal data including the following information: (a) categories of data, (b) purpose of processing, (c) recipients or categories of recipients, (d) storage periods, (e) the existence of the right to erasure, rectification, restriction and objection to procession, (f) right to lodge a complaint with a supervisory authority, (g) source from which the data were collected, (h) existence of an automated decision making, (i) safeguards used for transferring of data, (j) a copy of your personal data.
- **Right to Withdraw Consent:** If you have consented to the processing of your personal data, you have the right to withdraw your consent at any time. Please note that consent may only be withdrawn with respect to future processing and does not affect any data processing undertaken prior to the withdrawal of your consent. The withdrawal of consent has no effect

in relation to data processing undertaken based on other legal grounds listed in section 2 of this Data Protection Policy.

- **Right to Rectification:** You have the right to have your personal data corrected by SPA in case of inaccurate or incomplete information concerning your personal data.
- **Right to Erasure:** You have the right to have your personal data permanently deleted by SPA if the data are no longer necessary in relation to the purposes for which they were collected or processed, if there are no legal obligations for SPA to keep your personal data, if you have withdrawn your consent where data was collected and processed based on that consent, or if the data have been unlawfully processed.
- **Right to Restriction of Processing:** You have the right to restrict the processing of your personal data when, for example, you believe your information is inaccurate and we need time to verify it. Any processing, with the exception of storage of your personal data, can be resumed only with your explicit consent.
- **Right to Objection to Processing:** You have the right to object, on grounds relating to your particular situation, without any formal requirements, to the processing of personal data concerning you, if such processing is based on your consent, in the public interest, or in pursuit of the legitimate interests of SPA or a third party. You also have the right to object, without any formal requirements, to the use of personal data for marketing purposes. If you object to the processing of your personal data for direct marketing purposes, we will discontinue processing your personal data for that purpose.
- **Right to Data Portability:** you have the right to receive the personal data concerning you, which you have provided to SPA, in a structured, commonly used and machine-readable format, and to transmit those data to another controller without hinderance by SPA.
- **Right to Lodge a Complaint:** You have the right to lodge a complaint with a supervisory authority, in particular in the EU or EEA Member State of your place of habitual residence, place of work or the place of the alleged breach if you consider that the processing of your data infringes the GDPR.

swisspartners Ltd, Städtle 28, 9490 Vaduz, Liechtenstein, acts as representative of the SPA in accordance with Article 27 of the GDPR.

Please note that certain exceptions apply to these rights. In particular, we may be obliged to process your personal data in order to fulfil a contract, to protect our own interests, such as the assertion, exercise and/or defense of legal claims, and/or to comply with legal obligations. In these cases, we can reject certain requests or comply with them only to a limited extent.

The contact details for the data protection authority in Liechtenstein are set out below:

Liechtenstein Data Protection Office, Städtle 38, P.O. Box 684, 9490 Vaduz, Principality of Liechtenstein, Telephone +423 236 60 90, E-mail: info.dss@llv.li

You should preferably submit any requests for access or raise any objections in writing with the Data Protection Officer. The Data Protection Officer is also the appropriate point of contact for any other data protection matters and can be contacted here:

swisspartners Advisors Ltd.

Am Schanzengraben 23

8002 Zurich

Switzerland

Telephone: +41.58.200.0800

Email: info@swisspartners-advisors.com

6. Change of this Data Protection Policy

This Data Protection Policy may be modified by SPA at any time. New versions shall come into force upon publication on SPA's website. Use of the website and our services shall be deemed equivalent to acceptance of this Data Protection Policy.

Updated on *29 February 2024*