

**FACTS****WHAT DOES swisspartners Advisors Ltd DO WITH YOUR PERSONAL INFORMATION?**

<b>Why?</b>	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
<b>What?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>■ Social Security number and income</li> <li>■ investment experience and risk tolerance</li> <li>■ account balances and assets</li> </ul>
<b>How?</b>	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons swisspartners Advisors Ltd chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does swisspartners Advisors Ltd share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	Yes
<b>For joint marketing with other financial companies</b>	No	We don't share
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	No	We don't share
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	No	We don't share
<b>For our affiliates to market to you</b>	No	We don't share
<b>For nonaffiliates to market to you</b>	No	We don't share

<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>■ Call <b>888-772-5830</b> – our menu will prompt you through your choice(s)</li> </ul> <p><b>Please note:</b></p> <p>If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
<b>Questions?</b>	Call <b>888-772-5830</b> or go to <b><a href="http://www.swisspartners-advisors.com">www.swisspartners-advisors.com</a></b>

Who we are	
Who is providing this notice?	swisspartners Advisors Ltd
What we do	
How does <b>swisspartners Advisors Ltd</b> protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does <b>swisspartners Advisors Ltd</b> collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>■ enter into an investment advisory contract or give us your contact information</li> <li>■ give us your income information or provide account information</li> <li>■ seek advice about your investments</li> </ul> <p>We also collect your personal information from other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>■ affiliates from using your information to market to you</li> <li>■ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account—unless you tell us otherwise.
Definitions	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>Our affiliates include financial companies such as swisspartners Ltd and nonfinancial companies such as swisspartners Group Ltd and FRED Financial Data Ltd.</i></li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>Nonaffiliates we share with can include audit firms and marketing support companies.</i></li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>■ <i>swisspartners Advisors Ltd doesn't jointly market</i></li> </ul>
Other important information	
<p>You can contact us by using our contact information on Page 1 of this Form to exercise one or more of your rights, based on your domicile country, under the Swiss Federal Act on Data Protection, the EU General Data Protection Regulation and the applicable US laws, including but not limited to the California Consumer Privacy Act. We endeavor to ensure that the personal information we hold is accurate and up to date. To assist us, we recommend that you advise us if there are any errors in your personal information and promptly update us with any changes to your personal information.</p>	