

DATA PROTECTION POLICY

Update 2023

Introduction

This notice describes how PRIMENEST S.A. collects personal data from you during our business and how we then use that information in order to provide you with services. We will detail the reasons we process your data, how it is stored and what your rights are in respect of your dealings with PRIMENEST.

What information we may collect about you

We process personal information to enable us to provide financial services and advice, maintain our own accounts and records and in certain instances to promote our services. For this reason, the information processed may include:

- Identification data (e.g. surname, first name, date of birth, gender, region of residence, identifier, access data, contract number, identity card/passport number, telephone number, e-mail address), authentication data (e.g. specimen signature, password),
- Transaction/investment-related data (e.g. beneficiary or originator details, communications)
- Contractual data (e.g. data relating to a product, a financial service or an application/granting of credit), data relating to family status (e.g. marital status, matrimonial regime, heirs)
- Professional data (business details, professional activity, employers)
- Financial data (extract from the register of debt enforcement proceedings, income, assets).

Source, consent, legitimate grounds

The personal data processed by the company comes directly from the person concerned and within the framework of the contractual relationship with the person (Consent of the declaring person).

The data held by us may also come from authorized third parties (e.g. business introducers, competent authorities), or by searching for information in public databases (e.g. commercial register, land register, search database, etc.).

Our legal based for using personal data and confidentiality

The company collects and processes personal data in accordance with the LPD and is subject to confidentiality obligations arising from its field of activity. In order to process your data, it has to be necessary for the conclusion, administration, and performance of contractual relations or to meet a legal reason to do so. It may also process your data for security and statistical purposes

Sharing your information

- *Communication to third parties*

At all time we will respect your wishes regarding sharing any of your personal data to third parties. In the context of its mandates and the performance of contracts, the company may be required to communicate and exchange data with:

- third parties involved in the relationship, such as the custodian bank(s).
- outsourced service providers, such as compliance or risk management service providers; and
- providers of regulatory monitoring and audits.

To guarantee a level of security that complies with the law, the company places its service providers under a contractual obligation to guarantee the confidentiality of the personal data they process and ensures that this obligation is complied with.

- *Communication to authorities*

At the request of public, judicial or administrative authorities or regulatory or government bodies, personal data may be transferred to them. A legal basis or decision will always justify such a transfer.

Where we store your information

The data that we collect from you will be stored only in Switzerland. Sensitive data such as client names, personal information or contracts are kept only physically in secure safes.

Data retention

The period for which personal data is retained depends on the applicable legal and regulatory retention period, as well as the purpose for which the personal data is processed.

Generally, the company retains personal data for a period of 10 years from the end of the business relationship. A longer retention period may be justified in certain situations.

Individual rights

All the concerned person has the following rights in relation to their personal data, within the limits of the applicable regulations, in particular in the event of legal restrictions, overriding interests of third parties or abusive requests:

- the right to access personal data.
- the right to rectify inaccurate or incomplete personal data.
- the right to object to the processing of personal data and/or to request that the processing of personal data be restricted.
- the right to request the deletion of personal data. The right to deletion is not absolute, however, and may be restricted based on overriding interests that require the continued processing of personal data.

Any person concerned may exercise the rights by writing to the company at the address below. The request must be signed and accompanied by a copy of the identity document of the person concerned.

Contact

The company is responsible for processing data in accordance with this Data Protection Policy, unless required by law.

You can contact PRIMENEST SA for data protection issues and to exercise your rights at the following address: *PRIMENEST SA, Data Protection Service, Rue de la Cité 1, 1204 Geneva (Switzerland)*