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Privacy policy statement

This privacy policy statement informs you about how Hottinger AG handles your personal data.

ART. 1 – General

When it comes to the issue of data protection too, Hottinger AG is committed to an open, transparent and client-friendly approach. By personal data Hottinger AG means information which relates to a particular or identifiable person. Hottinger AG interprets processing as referring to any handling of personal data, irrespective of the means and methods used, in particular the collection, storage, use, adaptation, publication, archiving or destruction of personal data. In addition, the General Conditions as well as product- and service-specific information must be considered, which contain general information on data protection.

1.1 Data security

Hottinger AG undertakes to protect your privacy in line with the applicable laws, in particular through the rules on the client confidentiality and the law governing data protection. Hottinger AG takes numerous precautions to ensure this, such as the implementation of technical and organisational security measures (e.g. the use of firewalls, personal passwords as well as encryption and authentication technologies, access restrictions, awareness-raising and training of employees).

ART. 2 – Scope of processing

2.1 Categories of personal data

Depending on which products and services Hottinger AG provides to you, following categories of personal data can be processed. Hottinger AG's policy is to process as little personal data as necessary.

Hottinger AG processes client data. These include, in particular, the following:

- Master data and inventory data, for example name, address, phone number, e-mail address, occupation, economic and familial circumstances, financial goals, investment knowledge and experience, date of birth, contract number and duration, documents confirming the client's identity such as ID or passport, information relating to the account, securities deposit, payments, current or conducted transactions, contracts, products, services; or information relating to third parties such as life companions, family members, power of attorneys and advisers who are also affected by the data processing.

- Fiscal domicile and any other documents and information which may be relevant in terms of tax.
- Transaction or order management and risk management data, for example information on the beneficiary in the case of transfers or card payments, beneficiary bank, if applicable details of issued mandates, information concerning your assets, investment products, risk and investment profiles, cases of fraud, enquiries, advice, conversations, physical or electronic correspondence.
- If applicable, recordings of telephone conversations between you and Hottinger AG.
- Marketing data, for example requirements, wishes, preferences.
- Technical data, for example internal and external identifiers, trade numbers, IP addresses, records of accesses or changes.

Hottinger AG processes data relating to potential clients and visitors (i.e. visitors to branches or the website in particular). These include in particular the following:

- Master data and inventory data, for example name, phone number, e-mail addresses, addresses, date of birth, personal data.
- If applicable, records of telephone calls between you and Hottinger AG.
- Technical data, for example internal and external identifiers, IP addresses, records of accesses or changes.
- Marketing data, for example requirements, wishes, preferences.
- Data which is transmitted to us as a result of your visit to our website or which you disclose to us (e.g. via a form).

Hottinger AG processes supplier data. These include in particular the following:

- Master data and inventory data, for example names, addresses, functions, phone numbers, e-mail addresses, date of birth, contract numbers and durations, information relating to the accounts or conducted transactions.
- If applicable, records of telephone calls between you and Hottinger AG.
- Technical data, for example internal and external identifiers, trade numbers, IP addresses, records of accesses or changes.

2.2 Origin

In order to fulfil the purposes according to point 2.4, Hottinger AG can collect personal data with the following origin:



HOTTINGER

- Personal data communicated to Hottinger AG, for example in connection with the opening of business relationships, advisory consultations, products and services or on Hottinger AG's website.
- Personal data which are generated in connection with the use of products or services and which are communicated to Hottinger AG through technical infrastructures or through collaborative processes, for example in connection with the website, in connection with payment transactions and securities trading or during the course of cooperation with other financial or IT service providers or marketplaces and exchanges.
- Personal data from third-party sources, for example authorities, sanction lists maintained by the UNO, the SECO and the EU.
- Personal data, which is publicly accessible, e.g. on the internet, in the media, in public registers.

2.3 Period for which the data is stored

The period for which personal data is stored is determined according to statutory record-keeping obligations and the purpose for which the data in question is processed.

As a rule, Hottinger AG stores personal data for the duration of the business relationship or term of the contract and subsequently for a further five, ten or more years (depending on the applicable legal basis). This corresponds to the interval of time within which legal claims can be brought against Hottinger AG. Current or anticipated legal or supervisory authority proceedings can lead to data being stored beyond this period.

2.4 Purposes

Hottinger AG can process the personal data described under point 2.1 in connection with the provision of its own services as well as for its own purposes or those required by law. These include in particular the following:

- Client registration procedures, the conduct, processing and administration of the business relationships and products and services provided by a securities firm (for example verification of identities, evaluation of applications, payments, invoices, accounts, cards, investments, stock exchange, client service, communication).
- Monitoring and management of risks, business reviews, establishment of businesses, timely processing of business (for example combating fraud, investment profiles, limits, market, credit

or operational risks as well as system and product training).

- Statutory or regulatory information, disclosure or reporting obligations with respect to courts, authorities, compliance with official orders (for example the automatic exchange of information with foreign tax authorities, orders by the FINMA, public prosecutor's offices, in connection with money laundering or the financing of terrorism or for the purpose of recording and monitoring communications).
- Protecting Hottinger AG's interests and securing its claims in cases where claims are brought against Hottinger AG or clients of Hottinger AG as well as protecting the security of clients and employees.
- Any other purposes of which Hottinger AG has informed you.

2.5 Bases for the processing of personal data

Depending on which products and services Hottinger AG provides to you or the purpose for which the personal data is processed, the data processing is carried out on the following basis:

- Conclusion or performance of a contract or commencement of a business relationship with you or for the purpose of fulfilling Hottinger AG's obligation arising from such a contract or business relationship.
- If necessary, in order to protect Hottinger AG's legitimate interests, for example, business decisions, monitoring and management of risks, business reviews, protecting the Bank's interests and securing the claims of Hottinger AG, its clients and employees.
- If necessary, in order to fulfil statutory or regulatory obligations or perform duties in the public interest.

2.6 Are you subject to an obligation to provide personal data?

If personal data which Hottinger AG processes are necessary in order to fulfil statutory or regulatory obligations or for the conclusion or performance of a contract or the commencement of a business relationship with you, it may be the case that Hottinger AG cannot accept you as a client or cannot provide you with products or services if Hottinger AG is unable to process this personal data. In this case we will inform you accordingly.



HOTTINGER

2.7 Categories of intended recipients, guarantees and disclosure abroad

Within Hottinger AG, only those departments receive access to your personal data which require this for the conclusion or performance of a contract or the commencement of a business relationship, in order to fulfil statutory or regulatory obligations or perform duties in the public interest.

Hottinger AG only discloses client data to third parties in the following cases – depending on the nature of the products and services used:

- In order to execute orders, i.e. in relation to the use of products or services, for example to payees, beneficiaries, authorised account users, intermediaries as well as correspondence banks, other parties involved in a transaction, service providers, exchanges or marketplaces, reporting of certain stock exchange transactions to international transaction registers.
- On the basis of statutory obligations, legal justifications or official orders, for example to courts or supervisory authorities in the area of the law governing financial markets or tax matters or, where necessary, in order to protect Hottinger AG's legitimate interests in Switzerland and abroad. The latter applies in particular in the event of legal steps or public statements against Hottinger AG being initiated or threatened by the client, in order to secure Hottinger AG's claims against the client or third parties, in connection with the collection of Hottinger AG's claims against the client and in order to restore contact with the client after contact with the competent Swiss authorities has been broken off.

The term data processors refers to third parties who process personal data on behalf of and for the purposes of Hottinger AG, for example IT, financial service providers or consulting firms. If personal data is communicated to such a data processor, they may only process the received personal data in the same way as Hottinger AG does. Hottinger AG selects its contract processors carefully and places them under a contractual undertaking to guarantee confidentiality and client confidentiality in Switzerland as well as the security of the personal data.

ART. 3 – Rights

You have the right to information, rectification, erasure, restriction, objection, as well as - where applicable - the right to data portability. In addition, you have the right to lodge a complaint with a competent data protection supervisory authority (see point 4).

Hottinger AG accepts information requests in writing together with a clearly legible copy of a valid official identity document (for example passport, identity card) The contact details are provided under point 5. The right to erasure and the right to object are not unlimited rights. Depending on the individual case, overriding interests may necessitate further processing. Hottinger AG will examine each individual case and notify you of the result.

You can at any time withdraw your consent to Hottinger AG processing your personal data. Please note that such a withdrawal of consent would only affect the future. Processing which took place prior to withdrawal of consent is not affected.

If Hottinger AG fails to meet your expectations with respect to the processing of personal data, if you wish to complain about Hottinger AG data protection practices' or if you wish to exercise your rights, please notify Hottinger AG of this (see point 5). Among other things, this gives Hottinger AG the opportunity to address your concerns and if need be, make improvements. In order to assist Hottinger AG in responding to your enquiry, we request that you provide a correspondingly detailed notification. Hottinger AG will look into your concerns and will reply within an appropriate period.

ART. 4 – Contact details and exercising your rights

Hottinger AG is responsible for the processing of personal data:

Hottinger AG
Hottingerstrasse 21 / Postfach
8024 Zürich

To exercise your rights in accordance with section 3, you can contact the following office:

Hottinger AG
Data Office
Hottingerstrasse 21 / Postfach
8024 Zürich

or send us a message by e-mail to:
datenschutz@hottinger-ag.ch



Further questions related to data protection

You can address your questions in connection with data protection to the following department:
Hottinger AG
Compliance
Hottingerstrasse 21 / Postfach
8024 Zürich

If you are not satisfied with Hottinger AG's response, you have the right to lodge a complaint with the data protection authority. You can address general questions, suggestions, and comments to your relationship manager.

Last update: October 2023