EDMOND
DE ROTHSCHILD

Edmond de Rothschild (Suisse) S.A.

Personal Data Protection Charter

INTRODUCTION

This Charter applies to all personal data of clients and prospects who are natural persons (hereinafter referred to as "**data**") processed by Edmond de Rothschild (Suisse) S.A. (the "**Bank**" or "**we**"), acting as data controller.

This Charter also applies to the data of other natural persons, when this data is processed by the Bank as part of a business relationship with a client (hereinafter referred to as "**related person(s)**"). A related person may, in particular, be (i) a manager, director, employee or authorised representative of a company, (ii) a trustee, a settlor, beneficiary or protector of a trust, (iii) any representative or agent, including a proxy and/or a legal representative, (iv) an asset manager, (v) a beneficial owner or a controlling person, (vi) a natural person opening an account in the name of a third party, or (vii) an originator or beneficiary of a designated payment.

This Charter is subject to the Bank's Terms of Business which are also applicable. In the event of any discrepancy between this Charter and the Bank's Terms of Business, the latter shall prevail insofar as they are applicable.

What data do we collect ?

The data we collect or hold about you may come from a variety of sources. Some have been collected directly from you, and others may have been collected in compliance with applicable regulations, in the past or by other entities of the Edmond de Rothschild Group offering private banking services (hereinafter referred to as "**EdR Group**"). We may also collect information about you when you interact with us, for example when you visit our websites or when you use our mobile applications or when you call us or come to our offices.

Some data may come from sources that are accessible to the general public (e.g., public registers, press and websites) or have been collected from external companies (e.g., credit rating agencies or electronic databases).

The data that we process may enter into the categories listed below:

- information about your identity, such as your name, gender, date and place of birth, the information on your identification documents;
- your contact details, such as your mailing address, email address, telephone numbers;
- information you provide us with by filling in forms or by contacting us;
- information about your family circumstances such as, for example, civil status and number of children;
- professional information such as, for example, professional contact details, job and employment history, title, professional skills, powers of representation and, where applicable, sanctions or procedures;
- information about our business relationship, your transactions and instructions (including investment profile, amounts invested, details of current and previous transactions and investments, investment preferences, number and value of financial instruments held, role played within the framework of a transaction (i.e. buyer or seller), and information about your accounts or assets held with other financial institutions), the channels of communication you use with us, your ability to repay your credits, your creditworthiness and solvency, your transaction history, transactions generated on your accounts, your claims;
- information that we use to identify you and to authenticate you, in particular when you register and/or visit our platforms (online services, websites or mobile applications), such as your online

identifier (IP address), your contact details and your authenticator;

- any information contained in the client documentation or forms that you could fill in as a prospect;
- any information of a commercial nature, such as details of products or services you benefit from;
- data collected via Internet cookies (please refer to the Cookie Policy on our website for more information about our use of Internet cookies);
- information about your risk rating, such as your credit risk rating or transactional behaviour;
- data related to our internal investigations, in particular controls relating to screening carried out before we entered into a relationship with clients or controls carried out throughout our business relationship, controls relating to the application of the rules on sanctions, seizure of assets, the fight against money laundering and terrorist financing and all information relating to controls carried out with our means of communication;
- records of all correspondence and communication between us, including telephone calls, emails, social media communications or any other type of exchange and communication;
- photo or video recordings of you and your voice during your visits to our offices or at events organized by or in which an entity of the EdR Group participates;
- any information we need to meet our legal and regulatory obligations.

If we do not have certain data about you (or if you exercise your right to oppose data processing or request a restriction on data processing (see. "Your Rights" Section below), we may not be able to provide you with the service or product for which the processing of such data is required.

How do we use your data ?

We only use your data if you have provided your consent to it or if such use is based on a legal basis provided for by the regulations in force:

- the performance of a contract entered into, an undertaking for which you and/or we are engaged or a pre-contractual measure;
- compliance with a legal or regulatory obligation;
- preservation of public interest, such as the prevention or detection of fraud or financial crime; and
- the pursuit of our legitimate interests (e.g., (i) interest in the development of business relationship and the provision of information on services and products offered by the Bank, by entities affiliated to the Bank or by partners, (ii) interest in improving the Bank's internal organisation and processes, (iii) interest in risk assessment to which the Bank is subject and decision-making in risk management, and (iv) the Bank's interest in protecting its interests, defending or exercising rights in court and cooperating in investigations initiated by authorities in Switzerland or abroad).

We collect and process data about you for various purposes, including but not limited to the following purposes:

1. Providing products and services, processing your operations and executing your instructions;
2. Compliance with the clauses of applicable contracts;
3. Opening and holding of an account and/or entering into a business relationship with the Bank, including all formalities related to your identification and, where applicable, related persons;

4. Providing any financial service relating to the account, in particular the financial services specifically required by you;
5. Management, administration and distribution of collective investments, including the ancillary services relating to such activities;
6. Management of calls for tender and/or due diligence, the provision of services (including invoicing and the payment of fees) and management of the business relationship and related communications with you;
7. Sending out of information of an administrative nature such as, for example, an update to the Bank's Terms of Business;
8. Assistance as part of banking operations;
9. Compliance with laws and regulations, including:
    (i) providing clients and/or related persons with documentation and information on the Bank's products and services;
    (ii) monitoring compliance with legal requirements for accounting and regulation of financial markets;
    (iii) monitoring compliance with the regulations relating to the prevention of money laundering, the financing of terrorism, financial crime and market abuse;
    (iv) any form of cooperation with the competent authorities, in particular prudential supervisory authorities, the authorities in charge of the fight against money laundering and terrorist financing and the authorities involved in the automatic exchange of information on tax matters (including the Foreign Account Tax Compliance Act); and
    (v) any measure taken to implement international sanctions in accordance with the procedures established by the Bank, including the processing of data for screening purposes.
10. Prevention and detection of fraud or other offences (including through the recording of telephone conversations and electronic communications);
11. Security and pursuit of our activities;
12. Risk management and evaluation, including market risk, credit risk, operational risk, liquidity risk, legal risk and reputational risk;
13. Providing online banking services, mobile applications and other online product platforms;
14. Managing the Bank's IT environment;
15. Improvement of the Bank's products, services, organisation and internal processes;
16. Internet cookies, when using online applications (please refer to the Cookie Policy on our website for more information about our use of Internet cookies);
17. Improving the browsing and connection experience, the technical functioning of our platforms and their audience measurement;
18. Analysis of data for the purpose of targeting clients, including automated data processing ("profiling");
19. Marketing and business relationship development, in particular to provide you with information about the products and services of the EdR Group and the products and services of our partners and other third parties, unless you are opposed to the use of your data for this purpose;

20. Any processing with a view to improving the Bank's internal commercial organisation and operational activities;
21. Organisation of events to invite you and let you participate in dedicated events, organised in particular to promote our products and services to current or potential clients;
22. Disclosure of data to entities affiliated to the Bank, in particular to ensure an efficient and harmonised service and to inform you about the services offered by entities affiliated to the Bank;
23. Outsourcing of certain technological and IT management and maintenance activities to entities of the EdR Group or to third-party service providers that may operate in the *Cloud*; and
24. Any processing necessary to enable the Bank to establish, exercise or defend itself against a present or future claim, or to enable the Bank to face an investigation carried out by a public authority, in Switzerland or overseas.

The Bank specifies that it is subject to confidentiality obligations, which result in particular from banking secrecy. The data processed by the Bank may also be subject to these obligations. The Bank accordingly draws your attention to the article of its Terms of Business relating to this point which sets out the circumstances in which the Bank is released from its legal confidentiality obligations (including banking secrecy) by the client.

Furthermore, you may have expressed your desire not to see your data used but we still have to use it for different reasons. In such a case, we will continue to use it (i) if required by law, (ii) if we are to perform a contractual obligation, (iii) if it is in the public interest to do so (unless your interests, freedoms or fundamental rights prevail) or (iv) if we have a legitimate interest in doing so (unless your interests, freedoms or fundamental rights prevail) and, in all cases, (v) in proportion to the purpose pursued.

We would like to specifically draw your attention to the fact that you may, at any time and without justification, object to the use of your data for marketing purposes, including profiling by the Bank or third parties when linked to this purpose, or, where the consent is the legal basis for the processing, withdraw your consent by contacting us in accordance with the contact information provided at the end of this Charter.

Automated decision support systems

We may use automated decision support systems, such as when you want to buy a product or service, when you apply for credit, or during controls aimed at preventing the risk of fraud, money laundering or terrorist financing. Such processes may help us to determine whether the activity of a client or account involves a risk (credit, fraud or other risk).

We do not resort to "automated individual decisions" as part of business relations with clients. If we were to use "automated individual decisions" in the future, we would do so in accordance with the applicable legal and regulatory requirements.

Monitoring and recording of our exchanges

Subject to compliance with applicable local regulations, we may record and retain the conversations and communications you have with us, including telephone calls, face-to-face meetings, letters, emails and any other type of messaging service to verify your instructions. We may also use these records to appraise, analyse and improve our services, train our co-workers, manage risks, or prevent and detect fraud and other financial crimes from this data.

We use a video surveillance system in and around our offices for security purposes, so we may collect

images, photos, or videos of you, or record your voice through this process.

Who are we likely to share your data with and why ?

We may share your data for the following reasons:

- to provide you with products or services that you have requested, such as opening an account, responding to a subscription request or executing your instructions;
- to comply with a legal or regulatory obligation (for example to help detect fraud or tax evasion, to prevent financial crime);
- to respond to a request from an authority, manage litigation or to act in defence of our rights;
- to act on the basis of a legitimate interest, e.g., to manage an operational risk or assess the relevance or effectiveness of the marketing campaigns of our products or services;
- to maintain and manage our information systems and means of communication used in the course of our activities by seeking the continuous improvement of our services, the optimization of our processes and the security of our technological tools;
- to act in accordance with your consent that was previously obtained.

We may transfer and disclose your data to:

- other entities of the EdR Group;
- subcontractors, agents or service providers who work for us or other EdR Group companies (including their employees, directors and managers and also subcontractors using a Cloud type infrastructure);
- related persons, intermediary, correspondent and custodian banks, clearing houses, any stakeholder or market counterparty, stock exchanges or any company in which you hold financial instruments through us (e.g., shares or bonds);
- other financial institutions, tax authorities, professional associations, credit control agencies and debt collection agencies;
- authorities or agencies, in Switzerland or abroad, for the purposes of reporting or notification obligations applicable to the Bank;
- fund managers who provide you with asset management services and all intermediaries, distributors, independent asset managers and brokers who put you in touch with or deal with us on your behalf;
- any person, company or other person who has an interest in or assumes a risk with respect to or in connection with the products or services we provide to you;
- any entity (new or potential) of the EdR Group (e.g., in the event of restructuring or merger and/or acquisition transactions) or any entity that acquires all or part of an EdR Group entity;
- companies that conduct business or market studies for us;
- our external audit firm;
- any other person involved in the event of litigation;
- our lawyers (Swiss or foreign);

- any other legal or administrative authorities and any dispute resolution bodies.

How long do we keep the data for ?

We shall retain your data as long as you continue to use our services and platforms (e.g., our website or our mobile applications). We may also retain it even if you choose not to use our services or platforms, including for compliance with applicable law, defence of our interests, or enforcement of our rights. We do not keep it longer than necessary and when we no longer need it, we destroy it safely or we make it completely anonymous, in accordance with our internal policy.

In principle, the data will be kept for a period of at least ten (10) years after the end of the business relationship.

Certain data may be retained for an additional period of time for the management of claims and/or litigation as well as to meet our legal or regulatory obligations or to respond to requests from authorities.

International data transfers

In principle, your data may be transferred to, hosted in or accessed from Switzerland or a member state of the European Economic Area.

However, your data may also be transferred to, hosted in or accessed from another country (outside Switzerland or the European Economic Area) when the competent Swiss or European authorities have found/acknowledged that the country in question provides an adequate level of protection.

In addition, your data may be transferred to countries not offering an adequate level of protection if one of the following conditions is met:

- the transfer is protected by appropriate guarantees in accordance with the applicable regulations;
- the transfer is necessary for the execution of a contract between you and us or for the implementation of pre-contractual measures taken at your request;
- the transfer is necessary for the conclusion or execution of a contract concluded in your interest between us and one of our counterparties;
- the transfer is necessary for important reasons of public interest; or
- the transfer is necessary for the recognition, exercise or defence of our rights in court.

The countries to which Data may be transferred or made accessible are listed in the **Appendix**.

You can obtain further information on how we transfer your data outside Switzerland or the European Economic Area, including the copy of the appropriate guarantees mentioned above, by contacting us directly using the contact information at the end of this Charter.

Your rights

Subject to the restrictions provided by law, you have rights concerning your data:

- the right to obtain information about the data we hold about you and the processing implemented, as well as the right to request access to your data;
- the right to withdraw your consent to the processing of your data at any time (please note that we may continue to process your data if we have another reason to do so. Additionally, the withdrawal of consent is only valid for the future and does not affect the legality of the processing based on

consent and carried out before the withdrawal thereof);

- in certain circumstances, the right to receive data in electronic form and/or to request us to transmit such information to a third party where technically possible (this "right to data portability" is subject to certain restrictions and is only applicable to the data you have provided us);
- the right to rectify your data where it is incorrect or incomplete;
- the right to request the deletion of your data in certain circumstances (please note that legal or regulatory provisions or legitimate reasons may require us to retain your data);
- the right to ask us to restrict or oppose the processing of your data in certain circumstances (please note that we may continue to process your data if we have a reason to do so).

You can exercise your rights by contacting us directly using the contact details provided at the end of this Charter. You also have the right to lodge a complaint with the competent supervisory authority.

Exercising the rights described above or the non-provision of data requested by the Bank may be an obstacle to entering into or continuing our business relationship.

What do we expect from you ?

You must ensure that the data you have provided us with is relevant and up to date. In addition, you must inform us of any changes affecting these data.

You must ensure that the information contained in this Charter has been communicated to related persons as defined above.

How do we ensure the security of your data ?

We implement technical, procedural, and organisational measures to provide an adequate level of protection for your data, for example, in some cases, this is achieved through encryption, anonymization techniques, and the implementation of logical and physical security procedures.

We require our staff and all third parties working for the EdR Group to adhere to strict standards of security and data protection. Contractual obligations under which the latter undertake to protect all data and apply strict data transfer measures are put in place.

If you wish to contact us

If you wish to know more about the provisions of this Charter or exercise your rights indicated above, please feel free to contact our Data Protection Officer using the following contact details: DPO Edmond de Rothschild (Suisse) S.A., Avenue de l'Etang 62b, 1219 Châtelaine, Switzerland - « dpo-ch@edr.com ».

Furthermore, we would like to draw your attention to the fact that, if you are a resident in the European Union, you can also send any request concerning the processing of your data to our representative established in the European Union, at the following address: Edmond de Rothschild (France), Data Protection Officer (DPO), Rue du Faubourg Saint-Honoré 47, 75008 Paris, France - « dpo@edr.com ».

This Charter is subject to modification and the latest applicable version can be consulted at the following address: https://www.edmond-de-rothschild.com/

Appendix

List of countries to which Data may be transferred or made accessible

Data may be transferred or made accessible by the Bank in the course of its ordinary commercial activities and depending on the services and/or products which you use, to the following countries:

- Countries in the European Economic Area (Germany, Austria, Belgium, Bulgaria, Croatia, Cyprus, Denmark, Spain, Estonia, Finland, France, Greece, Hungary, Ireland, Iceland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Norway, the Netherlands, Poland, Portugal, Czech Republic, Romania, Slovakia, Slovenia and Sweden, the "**EEA**");
- the United Kingdom;
- Countries in which other EdR Group entities/branches are based (for a full list, you may contact our data protection officer using the contact details provided at the end of the Charter);
- Countries whose national authorities oversee the Bank's activities; and
- the United States of America.

It should be noted that your Data may be disclosed to other countries where you hold financial investments (for example, in securities, currencies or financial instruments, including derivative products or collective investment vehicles) and/or where you carry out transactions (for example, payments, operations on securities or other transactions) in relation to the services provided to you by the Bank. These transfers of Data (i) depend on the instructions given to the Bank by the account holder (or an authorised representative) or (ii) may be necessary for specific purposes required by the services you ask the Bank to provide. For example, in relation to a payment order in a currency other than CHF, the Bank is required to disclose the Data relating to the originator to the correspondent Bank located outside Switzerland. Similarly, certain Data relating to the investor may have to be disclosed outside Switzerland in relation to investments in certain collective investment undertakings.