

Data protection provisions: Avalor Investment AG

1. General information

These data protection provisions provide information on how we collect and process personal data from natural persons at Avalor Investment AG (hereinafter "Avalor", "we", "our" or "us").

"Personal data" means any information relating to an identified or identifiable natural person (this includes both clients and persons who are not clients of Avalor). "Processing" means any handling of personal data, regardless of the means and procedures used, the acquisition, storage, use, modification, disclosure, archiving, deletion or destruction of personal data.

For certain data processing, e.g. in the context of the conclusion of contracts, there are further regulations. These are regulated in the corresponding contracts.

Within the framework of our business relationship, we are required to process and store personal data that is necessary for the establishment and implementation of the business relationship. We also need this data to ensure the provision of our services or the execution of orders as well as the fulfilment of the associated legal or contractual obligations. Without this data, we will generally not be able to provide these services or to comply with the legal or contractual obligations.

2. Protection of personal data

We are committed to protecting personal data and privacy in accordance with applicable laws, in particular the Code of Professional Conduct and data protection law. For this purpose, we take various technical and organizational security measures (e.g., access restrictions, firewalls, personalized passwords as well as encryption and authentication technologies, training of employees, etc.).

3. Categories of personal data

We always process as little personal data as necessary. We process the following categories of personal data:

Client data, such as:

- Master data and personal data (e.g., name, address, nationality, date of birth, telephone number, e-mail address, information relating to accounts, custody accounts, concluded transactions and contracts, information about third parties who are affected by a data processing operation, such as spouses, authorized representatives and advisors).
- Transaction resp. order and risk management data (e.g., information on beneficiaries of transfers, beneficiary banks, payment amounts, risk and investment profile, information on investment products).

- Technical data (e.g., business numbers, IP addresses, internal and external identifiers, access records).
- Marketing data (e.g., preferences, needs).

Visitor and prospect data (e.g., our visitors or visitors to our website), such as:

- Master and personal data (e.g., name, address, e-mail address, date of birth).
- Technical data (e.g., IP addresses, internal and external identifiers, access records).
- Marketing data (e.g., preferences, needs).

Supplier data, such as:

- Master data and personal data (e.g., name, address, date of birth, information about concluded transactions and contracts).
- Technical data (e.g., IP addresses, internal and external identifiers, access records).

4. Origin of personal data

In order to fulfil the purposes set out in section 5, we may collect personal data from the following sources:

- Personal data that are communicated to us, e.g., when opening business relationships, in the context of the execution of contracts or the use of products or services, and that are transmitted to us through the technical infrastructure or through processes based on the division of labour.
- Personal data from third party sources, e.g., Internet, from authorities or sanction lists of the UN and the EU.

5. Purposes of processing

We may process personal data to provide our own services and for our own purposes or those provided for by law. This includes the following:

- Conclusion and fulfilment of contracts, execution, processing and management of products and services (e.g., invoices, investments).
- Monitoring and managing risks (e.g., investment profiles, anti-money laundering, limits, market risks).
- Planning, business decisions (e.g., development of new or assessment of existing services and products).
- Marketing, communication, information about and review of service offerings (e.g., client, prospect or other events, identification of future client needs).
- Fulfilment of legal or regulatory obligations to provide information or to report to courts and authorities, fulfilment of official orders (e.g., reporting obligations to FINMA and foreign supervisory authorities or other domestic and foreign

authorities, orders of public prosecutors in connection with money laundering and terrorist financing).

- Safeguarding our interests and securing our claims, e.g., in the event of claims against us or claims by us against third parties.

6. Disclosure to third parties, categories of recipients

We disclose client data to third parties in the following cases:

- For outsourcing activities according to section 7 and for the purpose of extensive client support to other service providers.
- For the execution of orders, i.e., when products or services are used.
- Due to legal obligations, legal justifications or official orders, e.g., to courts, supervisory authorities, tax authorities or other third parties.
- To the extent necessary to protect our own legitimate interests, e.g., in the event of legal action threatened or initiated against us by clients, in the event of public statements, to secure our claims against clients or third parties, in the event of debt collection, etc.
- With the consent of the persons concerned to other third parties.

7. Outsourcing of business areas or services (outsourcing).

We outsource certain activities and services wholly or partially to third parties. This includes, among others, services such as IT, accounting and portfolio management systems.

All service providers who process personal data on our behalf for this purpose (so-called "order processors") are thoroughly and carefully assessed before working with Avalor. Whenever possible, we use order processors domiciled in Switzerland. The order processors may be entitled to have certain services provided by third parties. The order processors may only process personal data received in the same way as we do ourselves and are contractually obliged to guarantee the confidentiality and security of the data.

8. Automated decisions in individual cases, including profiling.

We reserve the right to process client data automatically in the future, to identify key personal characteristics of the client, to predict developments and to create client profiles. This serves particularly to review and further develop services and to optimize the provision of services.

In the future, client profiles may also lead to automated individual decisions (e.g., automated acceptance and execution of client orders in the CRM system).

We ensure that a contact person is available if an affected person wishes to comment on an automated individual decision and such a possibility to comment is provided for by law.

9. Duration of storage

The duration of the storage of personal data depends on the purpose of the respective data processing and/or legal and regulatory retention obligations. As a rule, we store personal data based on statutory provisions for a period of ten years after the termination of the business relationship with Avalor, considering the statutory limitation period during which claims can be asserted against Avalor.

10. Rights of the persons concerned

Anyone can request information from us as to whether personal data about him or her is being processed. There is a right of objection, restriction of processing and, where applicable, a right to data portability. Incorrect data can be corrected.

Furthermore, the deletion of personal data may be requested, unless legal or regulatory provisions (e.g., legal retention obligations of business-relevant data) or technical hurdles prevent this. The deletion of data may have as a consequence that we are no longer able to provide certain services. In addition, where applicable, there is a right of appeal to a competent authority. Where we process personal data based on consent, this consent can be revoked at any time.

In order to assist us in responding to your request, we kindly ask you to inform us in an understandable way. We will examine and respond to your request within a reasonable period of time.

11. Status of these data protection provisions

These data protection provisions were last updated in August 2023. We reserve the right to adapt them from time to time if necessary. The currently valid version will be published on the Avalor website.

12. Contact

Written inquiries or comments may be sent to the following address:

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8001 Zurich
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