WYSS & PARTNER

PRIVACY POLICY

1.   General

The following data protection information provides an overview of the processing (i.e. collection, use, storage, transmission, archiving, deletion) of personal data held by Wyss & Partner Asset Management and Investment Counseling AG (Wyss & Partner) and the resulting rights in accordance with the provisions of the Data Protection Act (DPA) and the Data Protection Ordinance (DPO). Which data are processed in detail and in which way they are used, depends significantly on the respective services to be provided or agreed upon. Wyss & Partner is obligated to protect your privacy and confidentiality due to professional secrecy and for this reason takes a variety of technical and organizational data protection precautions for all data processing of personal data.

In the context of a (possible) business relationship, we are required to process personal data that is necessary for the establishment and implementation of the business relationship and the fulfilment of the associated legal or contractual obligations, as well as for the provision of services or execution of orders.

If you have any questions about data processing or rights (as described below under point 9), the data protection officer can be contacted:

Contact details of the data protection officer

Name: Wyss & Partner Asset Management and Investment Counseling AG
Function: Data Protection Officer
Address: Bahnhofstrasse 17
ZIP/City: 7323 Wangs, Schweiz
Phone: +41 81 720 06 88
Email: info@wysspartner.ch

2.   Which data is processed and from which sources does it come (origin)?

We collect and process personal data that we receive as part of our business relationship with our customers. Personal data may be processed at any stage of the business relationship.

In principle, we process personal data that is made available to us by means of submitted contracts, forms, correspondence, or other documents. If necessary for the provision of the service, we also process personal data that is generated or transmitted as a result of the use of products or services or that we have permissibly received from third parties, e.g., custodian banks or from public bodies (e.g., sanctions list of the UN and/or the EU). Personal data from publicly accessible sources (e.g., commercial register, press, Internet) may also be processed.

In addition to customer data, we may also process personal data from other third parties involved in the business relationship, such as data from authorized persons, representatives, or beneficial owners of a business relationship. Any third parties should also be informed about the present data protection information.

Relevant personal data are personal details (e.g., name, address and other contact details, date, and place of birth as well as nationality) and identification data (e.g., passport or ID data). In addition, this can also include order data (e.g., payment order, securities order), information about the financial situation (e.g., creditworthiness data, origin of assets), information about professional and personal backgrounds (e.g., professional

activity, family information), documentation data (e.g., consultation protocol), register data and other data comparable to the categories mentioned.

3.   For what purposes are personal data processed?

Wyss & Partner processes personal data in accordance with the provisions of the Data Protection Act (DPA) for the following purposes or based on the following legal bases:

- **To fulfil a contract or to carry out pre-contractual measures** as part of the provision of asset management, investment advice and other financial services that can be provided by Wyss & Partner. The purposes of the data processing depend primarily on the specific service or product (e.g., securities) and may include, among other things, needs analyses, asset management and the execution of transactions.
- **To fulfil legal obligations,** in particular compliance with legal and regulatory requirements (e.g., compliance with the Data Protection Act (DPA), the Financial Institutions Act (FinIA), the Financial Services Act (FinSA), the Financial Market Infrastructure Act (FMIA), the Anti-Money Laundering Act (AMLA) as well as control and reporting obligations or risk management).
- **To protect legitimate interests of us or third parties** for specifically defined purposes, in particular to determine creditworthiness, pursue claims, business audits and risk management, reporting, statistics and planning, prevention and investigation of criminal offenses or similar.
- **Based on consent** given to us for the provision of asset management services or based on orders, such as the transfer of data to service providers or contractual partners of Wyss & Partner. The consent can be revoked at any time. The revocation of consent is only effective for the future and does not affect the legality of the data processed up to the point of revocation.
  We reserve the right to continue to process personal data collected for one of the above purposes for the remaining purposes if this is compatible with the original purpose or is permitted or required by law (e.g., reporting obligations).

4.   Who gets access to the personal data?

Access to data can be obtained both within and outside of Wyss & Partner. Within Wyss & Partner, only departments or employees may process data if they need it to fulfil contractual, legal, and regulatory obligations and to protect legitimate interests. In compliance with the relevant legal provisions, e.g., at the customer's request or if there is a legal requirement, third parties (custodian banks, brokers, other service providers) may also receive personal data for these purposes.

If there is a legal or regulatory obligation, public bodies, and institutions (e.g., supervisory authorities, tax authorities, etc.) may also receive personal data.

5.   Will data be transferred to a third country or to an international organization?

Data is only transferred to third countries if this is necessary to carry out pre-contractual measures or to fulfil a contract, to provide services or to process orders (e.g., securities transactions) or is provided for by law (e.g., transaction reporting obligations) (Art. 16 DPA) or if we have been given the corresponding consent (Art. 17.1a DPA).

International transmissions pose a higher risk for Wyss & Partner. Employees may only transmit personal data if appropriate security precautions have been taken.

6.   How long is data stored?

We process and store personal data to the extent necessary. In addition, we are subject to various storage and documentation obligations, which result from the Swiss Code of Obligations (OR) and the Money Laundering Act (AML). The storage and documentation periods specified there are up to ten years.

7.   Is there automated decision-making, including profiling?

Wyss & Partner does not use automated decision-making (profiling) for the establishment and implementation of business relationships.

8.   Website

The use of our website is generally possible without providing personal data. The only exception is the contact form. Here, the personal data (surname, first name, street, city, phone, e-mail), which are entered for a contact, are stored by us for the purpose of processing the request. This data remains with us until we are requested to delete it or the consent to store it is revoked.

We take various technical and organizational data protection precautions and strive to protect all data as well as possible against unauthorized access, loss, misuse, or falsification. However, we would like to point out that data transmission on the Internet (e.g., when communicating by e-mail) can have security gaps. A complete protection of the data against access by third parties can therefore not be guaranteed.

9.   Data protection rights

Every data subject has the right to information (Art. 25 DPA) and, under certain conditions, to correction or deletion of personal data and to refrain from disclosure to third parties (Art. 32 DPA). The right to information may be restricted within the scope of Art. 26 DPA.

Wyss & Partner, July 2025