

PRIVACY POLICY

1. General Information

The following privacy information provides an overview of the processing (i.e., collection, use, storage, transmission, archiving, deletion) of personal data maintained by Wyss & Partner Asset Management and Investment Counseling AG (Wyss & Partner) and the resulting rights under the provisions of the Federal Act on Data Protection (FADP) and the Data Protection Ordinance (DPO). Which data is processed in detail and how it is used depends primarily on the services provided or agreed. Wyss & Partner is obliged to protect your privacy and confidentiality due to professional secrecy and therefore takes various technical and organizational data protection measures for all personal data processing.

This privacy policy applies to all persons whose personal data are processed in connection with Wyss & Partner's business activities, including customers, employees, suppliers, and other involved parties.

Within the scope of a possible business relationship, the processing of personal data is necessary to establish and conduct the business relationship, comply with associated legal or contractual obligations, and provide services and execute orders.

If you have questions about data processing or rights (as described below under point 12), 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, Switzerland
Phone: +41 81 720 06 88
Email: info@wysspartner.ch

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

Wyss & Partner collects and processes personal data obtained in connection with the business relationship with customers. In addition, personal data from other third parties related to the business relationship may be processed. The processing of these data can take place at any stage of the business relationship.

Basically, personal data processed are provided through submitted contracts, forms, correspondence, or other documents. As far as necessary for providing the service, personal data generated or transmitted due to the use of products or services may also



be processed, or personal data may be obtained lawfully from third parties such as custodian banks or public authorities (e.g., UN and/or EU sanction lists). Additionally, personal data from publicly available sources (e.g., commercial register, press, internet) may be processed.

In addition to customer data, personal data of other third parties involved in the business relationship, such as authorized representatives, proxies, or beneficial owners, may also be processed. Any such third parties should also be informed about the present privacy notices.

Special processing related to the use of our website, social media platforms, and newsletter distribution is described in detail in this privacy policy. Further details on these processing activities can be found in the respective sections below.

Relevant personal data include identity data (e.g., name, address, other contact details, date and place of birth, nationality) and identification data (e.g., passport or ID card data). Furthermore, this may include order data (e.g., payment order, securities order), financial situation data (e.g., creditworthiness data, origin of assets), information about professional and personal background (e.g., employment, family information), documentation data (e.g., advisory protocol), registry data, as well as other data comparable with the categories mentioned.

3. For which purposes are personal data processed?

Wyss & Partner processes personal data in accordance with the provisions of the Federal Act on Data Protection (FADP) for the following purposes or based on the legal grounds listed below:

- **To fulfill a contract or conduct pre-contractual measures** within the framework of the provision of asset management, investment advice, and other financial services that Wyss & Partner may provide. The purposes of data processing depend primarily on the specific service or product (e.g., securities) and may include needs analyses, asset management, and execution of transactions.
- **To fulfill legal obligations**, in particular compliance with statutory and supervisory requirements (e.g., compliance with the Federal Act on Data Protection (FADP), the Financial Institutions Act (FinIA), the Financial Services Act (FinSA), the Financial Market Infrastructure Act (FMIA), the Anti-Money Laundering Act (AMLA), the Ordinance on Occupational Retirement, Survivors' and Disability Pension Plans (BVV2), the Liechtenstein Act on UCITS (UCITSG), as well as control and reporting obligations or risk management).
- **To safeguard the legitimate interests of Wyss & Partner or third parties** for specifically defined purposes, in particular for creditworthiness assessment, claims enforcement, business inspection and risk management, reporting, statistics and planning, prevention, and investigation of criminal offenses, or similar.
- **Based on consent** granted for the provision of asset management services or due to orders, such as the transfer of data to service providers or contractual partners of Wyss & Partner. Consent may be revoked at any time. Revocation only affects



future processing and does not affect the legality of data processed before revocation.

Wyss & Partner reserves the right to further process personal data collected for one of the above purposes for other purposes if compatible with the original purpose or permitted or prescribed by law (e.g., reporting obligations).

The special processing related to the website, social media use, and newsletter distribution is explained in detail in the respective sections of this privacy policy.

4. Who has access to personal data?

Access to data may be granted both within and outside Wyss & Partner. Within Wyss & Partner, only departments or employees are allowed to process data to the extent necessary for fulfilling contractual, legal, and supervisory obligations or safeguarding legitimate interests. In addition, service providers, so-called contract processors, may process personal data on behalf and under instructions from Wyss & Partner, for example in the areas of IT, hosting, and support. Under compliance with applicable statutory provisions, third parties (custodian banks, brokers, other service providers) may also receive personal data for these purposes, e.g., at the customer's request or due to legal necessity.

If there are statutory or supervisory obligations, public authorities and institutions as well as appointed audit firms may also receive personal data. As a manager of collective assets (Verwalter von Kollektivvermögen) under the Financial Institutions Act (FinIA), Wyss & Partner is directly supervised by FINMA; personal data may be transmitted to FINMA within the scope of statutory reporting obligations. In connection with the management of collective investment schemes under Swiss law (CISA), data may be transmitted to the relevant custodian banks and service providers. In connection with the management of pension assets, data may be transmitted to the respective pension institutions. In the context of managing collective investment schemes under Liechtenstein law (UCITSG), data may be transmitted to the Financial Market Authority Liechtenstein (FMA) as well as the relevant custodian banks and service providers.

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

Data will only be transferred to third countries if this is necessary for the implementation of pre-contractual measures or for the fulfillment of a contract, for the provision of services or the processing of orders (e.g., securities transactions), if it is required by law (e.g., transaction reporting obligations) (Art. 16 FADP), or if the relevant consent has been obtained (Art. 17.1a FADP).

If users are redirected via links from the website to external platforms (e.g., social media platforms), the privacy policy and responsibility of the respective platform apply to their data processing. Wyss & Partner does not directly transmit personal data to third countries in these cases and assumes no responsibility for this.



When using Google services (e.g., Google Analytics or Google Maps), personal data (such as IP addresses) is transferred to servers of Google LLC and affiliated companies in the USA, which is considered a third country within the meaning of Art. 16 FADP. The basis for this transfer is the Standard Contractual Clauses approved by the European Commission (SCC, Implementing Decision EU 2021/914), which the Federal Data Protection and Information Commissioner (FDPIC) has recognized as adequate safeguards within the meaning of Art. 16 para. 2 lit. d FADP, as well as the Data Processing Agreement (DPA) concluded with Google LLC.

International transfers represent a higher risk for Wyss & Partner. Employees are only allowed to transfer personal data if appropriate security measures have been taken.

6. How long is data stored?

Personal data is processed and stored only as long as necessary. In addition, there are various retention and documentation obligations, among others from the Swiss Code of Obligations (CO) and the Anti-Money Laundering Act (AMLA). The retention and documentation periods can last up to ten years.

7. Cookies

Cookies are small text files stored on end devices and enable analysis of website usage. Wyss & Partner uses cookies to improve user-friendliness and analyze website usage statistically.

Wyss & Partner uses a cookie consent banner. When visiting the website, consent to the use of cookies is requested. The user can choose between "Accept all" and "Reject all". We use cookies to statistically evaluate the use of our website and to improve our offering. The data collected is anonymized and used for internal analysis purposes. With your consent, we share anonymized usage data with contracted service providers (Google Analytics, Google LLC and affiliated companies, as well as our online agency).

Cookie storage can be prevented or restricted via browser settings. This may limit some website functions.

8. Is there automated decision-making including profiling?

Wyss & Partner does not use automated decision-making (profiling) in its own business processes. Third-party providers such as Google LLC and affiliated companies may, however, conduct profiling as part of web analysis. For the use of social media platforms, the respective platform's privacy policy applies.

9. Website

The use of the Wyss & Partner website is generally possible without providing personal data. Exceptions include, for example, contact forms (such as for newsletter registration). In these cases, the provided personal data (e.g., name and email) is stored for the



purpose of processing the request. This data remains with Wyss & Partner until deletion is requested or consent to storage is revoked.

Wyss & Partner implements various technical and organizational data protection measures to protect all data as effectively as possible against unauthorized access, loss, misuse, or falsification. It is noted that data transmission over the internet (e.g., communication by email) may have security vulnerabilities. Complete protection of data against access by third parties therefore cannot be guaranteed.

9.1. Access Data/Server Log Files

During the operation of the website, technical access data, so-called server log files, are automatically collected. These data are collected either by Wyss & Partner itself or by the hosting provider. The collection serves to ensure the operation, security, and optimization of the website. In particular, the following data are logged (not exhaustive):

- Name of the requested website and file(s),
- Date and time of the request,
- Amount of data transferred,
- Notification of successful request,
- Browser type and version of the user's operating system,
- Referrer URL (the previously visited page) and exit pages,
- IP address and the requesting provider,
- Location data (especially when using mobile devices).

The log data are used exclusively for statistical evaluations for the purposes of operation, security, and stability of the web offering, as well as for optimizing the offering. These data are not merged with other personal data and are stored separately from any other personal data provided by the user. A subsequent review of the log data occurs only if there are concrete indications of unlawful use.

9.2. Integration of third-party services and content

Third-party content may be embedded on the website, including services from Google LLC and affiliated companies (e.g., YouTube videos, Google Maps) as well as graphics from other websites. Third-party providers may recognize users' IP addresses as this is technically necessary for content delivery.

9.3. Google Maps

Wyss & Partner's website uses Google Maps from Google LLC to display location information. Google Maps is only loaded after your explicit consent via our cookie consent tool. Only upon granting consent will a connection to the servers of Google LLC and affiliated companies be established and the IP address transmitted. Consent may be revoked at any time with effect for the future. Google's privacy policy is available at <https://policies.google.com/privacy>.



9.4. Google Analytics

Wyss & Partner uses Google Analytics, a web analytics service provided by Google LLC. Google LLC uses cookies, small text files stored on end devices that enable analysis of website usage. The information generated by cookies about the use of this website (including the anonymized IP address) is transmitted to servers of Google LLC and affiliated companies in the USA and stored there. Google LLC uses this data exclusively to evaluate website usage and to create reports for Wyss & Partner.

Wyss & Partner has also engaged an online agency to analyze the Google Analytics data. This agency acts as a contract processor within the meaning of the FADP; a corresponding Data Processing Agreement (DPA) has been concluded.

Google LLC acts as a contract processor within the meaning of the Swiss Federal Act on Data Protection (FADP). A corresponding Data Processing Agreement (DPA) has been concluded between Wyss & Partner and Google LLC.

Data collection by Google Analytics can be prevented by blocking cookie installation via browser settings or by installing a browser add-on to disable Google Analytics. This may, however, limit website functionality. Further information and Google LLC's privacy policy are available at <https://policies.google.com/privacy>.

9.5. Google Search Console

Wyss & Partner uses Google Search Console, a free tool by Google LLC for monitoring and optimizing the visibility of the website in Google Search.

Google Search Console does not collect any personal data that is accessible to Wyss & Partner. However, in the course of providing the service, Google LLC also processes IP addresses. These are used by Google LLC in data processing for protection and analysis and are partly anonymized.

The stored and processed data serve the technical improvement and optimization of the website presence.

9.6. Plugins

Wyss & Partner uses plugins to manage and integrate web services on the website. These plugins serve to centrally control and analyze the web services.

9.7. Use of Links to Social Media

The Wyss & Partner website contains links to social media platforms such as LinkedIn. Data transfer to these platforms occurs only when the links are actively clicked and the respective pages are visited (e.g., IP address, browser type, referrer URL). Wyss & Partner has no influence on data usage by these platforms. Further information is available in the privacy policies of the respective providers, e.g., LinkedIn at <https://www.linkedin.com/legal/privacy-policy>.



10. Use of Social Media Links in Emails

Wyss & Partner's email disclaimers may contain links to social platforms such as LinkedIn. Data transfer to these platforms occurs only upon active clicking of the respective links (e.g., IP address, browser type, referrer URL). Wyss & Partner has no influence on the scope and use of data by these third-party providers. Further information can be found in the privacy policies of the respective providers.

11. Email Newsletter

When subscribing to the Wyss & Partner newsletter, the provided email address and name are used to send information about products, services, and market developments. Registration is made via the registration form on the website. The consent granted is documented by Wyss & Partner.

Unsubscription is possible at any time – either by a simple message sent by email to the address listed in the imprint or by written notification to Wyss & Partner. After unsubscription, the email address will be promptly removed from the mailing list.

12. Data protection rights

Every data subject has the following rights under the Swiss Federal Act on Data Protection (FADP):

Right to access (Art. 25 FADP): Right to obtain information about whether and which personal data are being processed. The right of access may be restricted pursuant to Art. 26 FADP.

Rectification: Right to correction of inaccurate or incomplete personal data.

Erasement and prohibition of disclosure (Art. 32 FADP): Right to erasure or blocking of data disclosure to third parties under the statutory conditions.

Data portability (Art. 28 FADP): Right to receive personal data processed in a commonly used electronic format or to have it transferred to another controller, provided the data is processed automatically and no disproportionate effort is involved.

Right to object: Right to object to data processing where such processing is based on legitimate interests and no overriding interests apply.

To exercise these rights, the data protection officer (see section "General Information") may be contacted. In addition, violations of data protection regulations may be reported to the Federal Data Protection and Information Commissioner (FDPIC).

13. Changes to the privacy policy

Wyss & Partner reserves the right to change, supplement, or adjust this privacy policy at any time without giving reasons. The currently published version on the website applies.

Wyss & Partner, September 2026

