

Data Privacy Notice

The purpose of this Data Privacy Notice (hereinafter referred to as the "**Notice**") is to inform data subjects about how we collect, store and process data (hereinafter referred to as the "**Subjects**").

1. Entity Responsible for Processing and Principles

The responsible entity for processing, Cité Gestion SA, Rue de la Cité 15-17, 1204 Geneva, Switzerland (hereinafter "**Cité Gestion**"), recognizes the importance of keeping the personal data of its customers confidential and protecting their privacy rights. Regarding its activities and the data collected by it, Cité Gestion intends to apply the most restrictive principles and standards that are identifiable with respect to the protection of personal data.

In this respect, Cité Gestion has appointed a Data Protection Officer (DPO): s.micotti@cite-gestion.com.

Consequently, all personal data and information (hereinafter referred to as "**Data**") used in connection with our services will be processed lawfully, fairly, transparently and confidentially by Cité Gestion.

2. Consent

The Subject, by contracting the services offered by Cité Gestion (hereinafter referred to as the "**Services**"), and in accordance with the legal provisions in force, acknowledges and agrees that, in connection with the Services, Data is or will be collected by Cité Gestion. The Data will be collected and used solely for the purposes of the Services offered by Cité Gestion or any subsequent contractual relationship with Cité Gestion.

Therefore, entering into an engagement (asset custody, asset management, investment advice, family office, or other) with Cité Gestion means that the Subject agrees to the collect, processing of Data and adheres to this Notice. Similarly, the entry into negotiations already constitutes an agreement by the Subject to the collect and adherence to this Notice, insofar as Cité Gestion is already legally required to collect information on its potential clients, even if no business relationship subsequently materializes.

3. Legal Basis and Purposes of Data Collection and Processing

3.1. Legal Basis

The Subject concerned acknowledges that the collection and processing of Data by Cité Gestion is necessary for the fulfilment of the mandate entrusted to Cité Gestion to which the Subject concerned is a party in connection with the Services, but also for the preservation of the legitimate interests of Cité Gestion and for the fulfilment of legal obligations incumbent upon Cité Gestion. Cité Gestion is bound by a legal obligation to collect and process data from any client or potential client entering into discussions with it.

3.2. Purposes

The Data is collected and processed by Cité Gestion for the following purposes (hereinafter referred to as "**Purposes**"):

- The opening and maintaining of the contractual relationship with the Subject or the beginning of a business relationship with Cité Gestion (hereinafter referred to as "**Business Relationship**"), including all formalities relating to the identification of the Subject and of any person or entity over whom the Subject or a third party provides information and / or of which Cité Gestion has knowledge in any other way in connection with the Business Relationship (hereinafter referred to as "**Related person**").
- Any other related services provided by Cité Gestion' service providers and subcontractors in a Business Relationship.
- The management, administration, placement and distribution of financial products, including all services related to these activities.
- The compliance with legal and regulatory obligations to which Cité Gestion is subject under regulations applicable to Swiss financial intermediaries (e.g. Anti-Money Laundering Act, International Financial Regulations (e.g. FATCA, Automatic exchange of information, etc.)).
- The weighing interests, the protect of the interests of Cité Gestion or third parties: prevention and elucidation of criminal offenses, risk management, exercise of rights and defense in litigation, consultation and exchange of information with information desks, computer security, safety of buildings and facilities.
- The Cité Gestion's Customer Management: invoicing services, marketing (newsletters, event invitations, etc.) and others.

4. What Data is Collected?

4.1. Types of Data

Cité Gestion collects the following data (exemplary, non-exhaustive list) from its counterparties (current or potential clients, business providers, third party managers, clients, trustees, private investment vehicle administrators, lawyers, banks, other financial intermediaries and counterparties):

- Identification data: personal identification data (name, surname, title, tax identification number) and structural identification data (information relating to investment entities), commercial and professional activities, personal or professional links with third parties, exposure in the media or national or international, public or private databases, etc.
- Identification data issued by public authorities and other registers: identity cards, passports, certificate of incorporation, articles of association, share registers.
- Location data: personal and business addresses of investment entities.
- Communication and electronic identification data (personal and business): telephone number, e-mail address, WhatsApp, etc.
- Financial data: identification number and bank account numbers, financial means / wealth, income, investments, financial transactions.

4.2. Information Collected Directly from Subjects

Cité Gestion collects and records all information provided to it in connection with the Services or by any other means in its Customer Relationship Management (CRM, PMS) system. The Subject may choose not to provide Cité Gestion with certain information, however this decision may have the effect of depriving the Subject of certain Services or features offered in connection with the Services. In some cases, the refusal to provide certain data required by applicable law or regulation may result in (i) a search by Cité Gestion to obtain this information through other means, in particular if required by law and/or (ii) the communication of the case report to the criminal or anti-money laundering authorities.

4.3. Information Collected from Third Parties - Subcontractors

As part of its Services, Cité Gestion may also collect data from third parties (introducer, trustees, administrators of private equity vehicles, lawyers, banks, other financial intermediaries, list of international sanctions, information available to the public (e.g. Bloomberg, World-Check, FACTIVA or LexisNexis)). Data collected from third parties is treated in the same way as Data collected directly from the Subjects (see paragraph 4.2 above). By using Cité Gestion Services or by accepting the possibility of using them (potential client), the Subject adheres to this Notice and accepts the collection of data concerning him/her from third parties.

Cité Gestion may be considered as a processor of personal data in the context of information collected from third parties, according to the applicable regulations. Should this be the case and necessary, Cité Gestion will enter into a subcontracting agreement with the third parties concerned to ensure compliance with the present Notice.

5. **Methods of Data Processing**

The Data is processed by Cité Gestion - or by third parties selected on the basis of their reliability and competence, as well as by duly appointed data controllers - solely for the purpose of carrying out the purposes specified in paragraph 3.2 above, mainly by means of computer tools, but also on paper.

Cité Gestion retains the Data for as long as necessary for the fulfilment of the Purposes for which it was collected and in accordance with the regulations applicable to the Services (for example, ten years in connection with banking services or the Code of obligations).

Similarly, Cité Gestion deletes or anonymizes personal data (or takes equivalent measures) as soon as they are no longer necessary to achieve the Purposes, subject however (i) to legal or regulatory requirements applicable to the data retention for a longer period of time, or (ii) to ascertain, exercise and / or defend actual or potential rights in legal proceedings, investigations or similar proceedings, including legal holds that Cité Gestion might impose to preserve relevant information.

Specific measures are applied to prevent the risk of loss of data, unlawful or improper use and unauthorized access (see paragraph 7 (Confidentiality, Security and Data Protection) below).

6. **Profiling**

Cité Gestion may evaluate certain characteristics of the Subjects and Related Persons on the basis of automatically processed Data in order, in particular, to offer them personalized offers and advice or information about its Services. Cité Gestion may also use technologies to identify the level of risk associated with a particular Subject or Business Relation activity.

In contrast, Cité Gestion does not use automated decision making in relation to a Business Relationship, a Subject, or a Related Person.

7. Access to Data and Data Transfers

The Data transmitted to Cité Gestion will be known and used by Cité Gestion employees and/or its subsidiaries (national or foreign) for the sole purpose of performing the Services that constitute the purpose for which the Data was collected.

As part of the performance of the Services, Cité Gestion may transmit the Data to third parties, in particular to (i) custodian banks, financial/administrative or back office service providers or, (iii) national and international tax authorities, in accordance with fiscal reporting obligations.

The transmission of data to third parties abroad is alternatively based on (i) an adequacy decision, (ii) appropriate safeguards or (iii) a waiver for specific situations (execution of a mandate related to the Services offered by Cité Gestion, in particular).

It is already stated that:

- In dealings with custodian banks, Data transfers may take place towards national and international banks, as well as towards any other financial intermediary.
- In the management of its administrative and technological obligations, Data transfers may take place towards an entity of the Lombard Odier group that provides Cité Gestion with an information infrastructure for managing contractual relations.
- As part of the implementation of FATCA regulations, data transfers may be made to the Internal Revenue Service (IRS) or any other competent tax authority recognized by the IRS.
- In the context of the implementation of the Automatic Exchange of Information (AEOI), data transfers may take place with any competent tax authority, it being specified that the condition of confidentiality of data is a *sine qua non* stipulated by the OECD to adhere to the AEOI Mechanism.
- As part of the implementation of any other regulations and Services, GCG carries out an assessment of Data recipients in accordance with applicable data standards.

Cité Gestion does not sell or rent the Data to any third party.

Finally, Cité Gestion may have to share the Data:

- To put the needed Service to the Subjects disposal;
- Where permitted or required by law to comply with a valid legal process;
- To protect and defend Cité Gestion' rights or property, including the security of its products and services;
- To protect the personal safety, property or other rights of the public, Cité Gestion or its customers or employees; or
- In connection with the sale of all or part of Cité Gestion' operations.

If Cité Gestion is required by law to disclose the Data to third parties, Cité Gestion will take all commercially reasonable steps to notify you in advance, unless otherwise required by law. If Cité Gestion engages in a process of merging, acquiring or selling assets, Cité Gestion will comply with this Notice.

8. Privacy, Security and Data Protection

Cité Gestion undertakes to ensure that there are adequate levels of protection of Data, in particular those relating to professional secrecy and data protection.

Subjects' Data will be transmitted to and stored on Cité Gestion' servers, access to which is strictly limited. Cité Gestion has taken the appropriate technical and organizational precautions to ensure that its servers are accessible exclusively to duly authorized persons, as well as special precautions with regard to the protection of its technical environment (e. g. use of anti-viruses and Firewalls).

9. Rights of the Subjects

In accordance with the applicable regulations, Subjects may exercise the following rights with respect to their data in connection with the processing of Data:

- Right to request access to stored data;
- Right to request the rectification of stored data;
- Right to request the deletion of stored data, subject to the applicable legal provisions on data retention;
- Right to request a limitation of the processing of stored data, subject to the applicable legal provisions regarding the processing of data; and
- Right to request a prohibition on the processing of stored data, subject to the applicable legal provisions regarding the processing of data.

Even if a Subject contests the processing of its Data, Cité Gestion is entitled to continue such processing if it is (i) legally binding, (ii) necessary for the performance of the Contract to which the Subject is party, (iii) necessary for the performance of a public interest mission or (iv) necessary for the legitimate interests that Cité Gestion pursues, including the finding, exercise or defense of a right in justice.

Generally speaking, the Subject has the right to require Cité Gestion to protect their data. Cité Gestion works tirelessly to protect itself and its users from unauthorized access, alteration, disclosure or destruction of information that is held. More specifically:

- Cité Gestion respects this Notice in all circumstances with respect to all Data that Cité Gestion collects about the Subject concerned.;
- Cité Gestion limits the use and disclosure of Data and ensures that anyone with whom Cité Gestion shares this information will treat it with the confidentiality and security it deserves.; and
- Cité Gestion has implemented physical, technical and administrative procedures to protect the information collected.

The exercise of any right set forth in the paragraph shall be carried out in accordance with the communication provisions of paragraph 10 (Communication and Remarks) below.

10. Communication and Remarks

If you have any questions about Cité Gestion' data protection, a detailed message can be sent to (info@cite-gestion.com) and Cité Gestion will address them as soon as possible.

You may exercise any of your rights related to Personal Data (paragraph 9) by sending your request to the aforementioned address.

Cité Gestion' business is constantly evolving and this Notice and the Terms of Service may change. Unless otherwise stated, our Notice applies to the use of all information collected about any Subject.