

Data protection declaration

This data protection declaration (hereinafter, the " **Declaration** ") applies to any processing of personal data of individuals, in particular our customers, prospects, or persons linked to them, as well as the users of our websites and applications (hereinafter, the " **Relevant Person(s)** ") carried out within the framework of existing business relationships and/or relationships with potential clients, including during use of our website and applications (collectively, the " **Business Relationship** ").

1. Data controller and principles

Cité Gestion SA, Rue de la Cité 15-17, 1204 Geneva, Switzerland (hereinafter, " **Cité Gestion** ") is the controller of the personal data processed within the framework of the Business Relationship.

Cité Gestion recognizes the importance of keeping the personal data of its clients confidential and protecting their right to privacy, in accordance with the rules imposed by the Swiss federal law on data protection (LPD).

All personal data (hereinafter, the " **Data** ") used in the context of a Business Relationship will be processed lawfully, fairly, transparently and confidentially by Cité Gestion.

2. Acceptance

The Data Subject, by requesting or entering into a Business Relationship with Cité Gestion, by negotiating or concluding a mandate (asset deposit, asset management, investment advice, family office, or other) with Cité Gestion, or by transmitting Data to Cité Gestion, confirms having read and accepted this Declaration and the processing described therein.

3. Purposes of data collection

Cité Gestion processes Data mainly for the purpose of providing, documenting, improving and billing its services, but also for the preservation of its legitimate interests. This includes in particular processing intended to comply with legal requirements (e.g. verification of the co-contractor and the beneficial owner), which extends to any client or potential client entering into negotiations with Cité Gestion. We also process Data Subjects in order to communicate with them, respond to their requests and send them information relating to our services, invitations to events, commercial offers or *newsletters* . If you do not wish to receive commercial offers or *newsletters* from us, you can unsubscribe at any time by writing to us at the email address mentioned below in ch. 11 .

In particular, the Data is processed by Cité Gestion for the following purposes:

- the opening, maintenance and execution of the Business Relationship and services with the Data Subjects or the start of a Business Relationship with Cité Gestion, including all formalities relating to the identification of the Person Concerned and persons linked to the Business Relationship;
- the provision of any other ancillary services provided by Cité Gestion's service providers and subcontractors in a Business Relationship;
- compliance with the legal and regulatory obligations to which Cité Gestion is subject under the applicable regulations (in particular: law on money laundering and application of related regulations,

international financial regulations such as for example FATCA, automatic exchange of information taxes, etc.).

- the protection of the overriding interests of Cité Gestion or third parties: prevention and elucidation of criminal offenses, risk management, exercise of rights and defense in disputes, consultation and exchange of information with information offices, sale of all or part of Cité Gestion's activities, IT security, building security (e.g. through badge systems or video surveillance) and installations.
- the development, improvement and analysis of products and services and the proper functioning of the website.

Cité Gestion may also combine your Data with other information (aggregation) or erase any information allowing you to be identified (anonymization), so that it is no longer considered personal data under applicable protection legislation. data, in which case this Statement will no longer apply and we may use such data for purposes not intended by this Statement (for example, for benchmarking purposes, internal research and development, analysis or to develop and market new services or for other needs of Cité Gestion or third parties).

4. Policy regarding the use of Cookies

If you visit our website, we may use cookies to study certain aspects of your use. Cookies are small data files (text file) that are stored on your terminal (e.g. computer or mobile device).

In general, the *cookies* that we may use aim to ensure the security of our services, to facilitate and improve your navigation on our website, or to establish statistics and volume of attendance and use of the functionalities of our website. to improve its use.

You can object to the use of non-essential *cookies at any time* by contacting us using the contact details given in ch. 11 .

5. What Data is collected?

5.1. Data Types

Cité Gestion is required to collect the following data (exemplary list, non-exhaustive) from its counterparties (current or potential clients, business providers, third-party managers, trustees, administrators of private investment vehicles, lawyers, banks , others financial intermediaries and counterparties) or from authorities:

- Identification data: personal identification data (surname, first name, title, tax number) and structural identification data (information relating to investment entities), commercial and professional activities, professional functions, personal or professional links with third parties, exposure in the media or national or international, public or private databases, agents or representatives (including their respective contact details), etc.
- Identification data issued by public services and other registers: identity cards, passports, certificate of incorporation, statutes, commercial register, land register, share registers.
- Location data: personal and professional addresses relating to investment entities.
- Communication and electronic identification data (personal and professional): telephone numbers, email addresses, WhatsApp, etc.
- Financial data: identification and bank account numbers, financial means, assets, income, investments, debts, financial transactions and origin of funds.

Additional data: information related to the use of our *Newsletter* and participation in our events, as well as other information transmitted to us by Data Subjects or persons linked to them.

5.2. Information collected directly from Data Subjects

Cité Gestion collects and records all the information communicated to it within the framework of the Business Relationship, in particular using its customer relationship management systems, or which results from interactions with the services provided (recording of transactions, etc.). The refusal by the Data Subject or their representative to communicate certain information may make it impossible for Cité Gestion to enter into or maintain a Business Relationship. In certain cases, the refusal to provide certain data imposed by the applicable law or regulation may result in (i) a search by Cité Gestion to obtain this information by other means, particularly if the legislation requires it to do so and/or (ii) the communication of the Business Relationship to the criminal authorities or to the competent authorities in the fight against money laundering.

5.3. Information collected from third parties or subcontractors

As part of the Business Relationship, Cité Gestion may also be required to collect Data from third parties or subcontractors (business providers, trustees, administrators of private investment vehicles, lawyers, banks, other intermediaries financial statements, lists of international sanctions, or other information available from public authorities as well as information available to the public either freely or on the basis of paid services, such as data resulting from official registers (commercial register, land register, property registers). prosecutions, etc.) or data processed by professional databases, in particular Bloomberg, World-Check, FACTIVE, LexisNexis, Polixis or their competitors).

Data collected from third parties is treated in the same way as Data collected directly from Data Subjects (see paragraph 4.2 above).

The categories of data collected from third parties are:

- Identification data: personal identification data (surname, first name, title, tax number) and structural identification data (information relating to investment entities), commercial and professional activities, professional functions, personal or professional links with third parties, exposure in the media or national or international, public or private databases, agents or representatives (including their respective contact details), etc.
- Identification data issued by public services and other registers: identity cards, passports, certificate of incorporation, statutes, commercial register, land register, share registers.
- Location data: personal and professional addresses relating to investment entities.
- Communication and electronic identification data (personal and professional): telephone numbers, email addresses, WhatsApp, etc.
- Financial data: identification and bank account numbers, financial means, assets, income, investments, debts, financial transactions and origin of funds.

5.4. Information collected automatically

Cité Gestion may also collect Data in an automated manner, in particular regarding the use of our digital services, the location of connection, the IP address, including by means of cookies and other active elements, as described in more detail. in this Declaration.

6. Data processing methods

The Data is processed by Cité Gestion (in particular its bodies, employees, Swiss or foreign subsidiaries) – or by subcontractors selected based on their reliability and skills, as well as by duly appointed data controllers – only in the aim of executing the purposes specified in paragraph 3 above (hereinafter, the “ **Purposes** ”), mainly through IT tools, but also on paper.

Cité Gestion keeps the Data for the time necessary for the execution of the Purposes for which they were collected and in accordance with applicable regulations. Unless otherwise agreed in writing by the Data Subject, Cité Gestion is authorized to destroy all files or recordings 10 years after the date of the services provided.

Likewise, Cité Gestion deletes or anonymizes the Data (or takes equivalent measures) as soon as it is no longer necessary to achieve the Purposes, subject to (i) the legal or regulatory requirements applicable to the retention of data over a period longer, or (ii) for the determination or exercise of its rights, as well as to defend its interests, in legal proceedings, investigations or similar procedures, including legal declarations that Cité Gestion could impose to preserve the relevant information.

7. Profiling

Cité Gestion may evaluate certain characteristics of Data Subjects on the basis of automatically processed data in order, in particular, to offer them personalized offers, advice or information on its services.

However, Cité Gestion does not in principle use an automated decision-making process in relation to a Business Relationship, a Data Subject or a person linked to it. However, if this is the case in a particular case, Cité Gestion will comply with the applicable legal and regulatory requirements.

8. Data Transmission

The Data may be transferred abroad. However, we only transfer the Data to states OUTSIDE Switzerland if (i) there is appropriate data protection, comparable to that applied by Switzerland or (ii) the recipient concerned makes a contractual commitment to Cité Gestion to ensure equivalent protection according to protection clauses previously communicated, approved, established or recognized by the Federal Commissioner for Data Protection and Transparency or (iii) such transfer results from a legal obligation of any nature whatsoever or is otherwise authorized, in particular under one of the reasons listed in article 17 al. 1 LPD.

We do not transmit any personal data to third parties without the consent of the person concerned, except when this takes place in connection with the performance of the services provided within the framework of the Business Relationship or when this is necessary for the purposes described in this Declaration. In particular, Cité Gestion does not sell or rent the Data to any third party.

Information may in particular be transmitted to Swiss or foreign custodian banks, Swiss or foreign financial intermediaries, or to Swiss or foreign authorities, in particular to tax authorities, in accordance with tax reporting *obligations* . It is specified that as part of the implementation of FATCA regulations, Data transfers may take place with the *Internal Revenue Service* (IRS) in the United States or any other competent tax authority recognized by the IRS . Likewise, as part of the implementation of the Automatic Exchange of Information (EAR), Data transfers can take place with any competent tax authority, it being specified that the condition of

data confidentiality is a sine qua obligation . *not* stipulated by the OECD to adhere to the Automatic Exchange of Information mechanism.

Cité Gestion may also transmit Data to subcontractors in Switzerland or abroad, in particular to IT service providers, including service providers offering cloud solutions, and to other service providers necessary for the provision of services , including some may be located outside Switzerland or have links abroad, including the United States. In this context, we take technical and organizational measures, including encryption, to limit access to the Data by our subcontractors as far as possible.

9. Confidentiality, security and data protection

Cité Gestion is subject to certain obligations of confidentiality and/or respect for secrecy arising from legal provisions, banking secrecy, professional secrecy and contracts concluded with the Data Subjects, as applicable.

Cité Gestion also takes appropriate measures to preserve the confidentiality of the Data, in accordance with applicable legal and regulatory requirements, in particular those relating to banking secrecy and data protection.

10. Rights of Data Subjects

Data Subjects may exercise their rights in accordance with applicable Swiss data protection law. In particular, Data Subjects have the following rights, subject to applicable legal provisions (e.g. financial markets law, FACTA law, EAR, etc.):

- right to request access to the Data stored;
- right to request rectification of the Data stored;
- right to request erasure of stored Data;
- right to request a limitation of the processing of the Data retained;
- right to object to the processing of stored Data; And
- right to delivery or transmission of personal data in an interoperable format.

If Cité Gestion's processing is based on the consent of the Data Subject, the Data Subject has the right to revoke their consent at any time with effect for the future. In such a case, Cité Gestion may find it impossible to continue the Business Relationship due to its legal obligations and reserves the right to terminate it.

To exercise their rights, Data Subjects can contact Cité Gestion at privacy@cite-gestion.com . Cité Gestion processes these requests in accordance with Swiss data protection law and may also refuse or execute them in a restricted manner in accordance with legal provisions.

Furthermore, Data Subjects have the option of contacting the Federal Data Protection and Transparency Commissioner (www.edoeb.admin.ch).

11. Notices

If you have any questions regarding Data protection by Cité Gestion or any other question relating to data protection, you can send us a detailed message at (privacy@cite-gestion.com) and we will try to resolve them. provide a solution as quickly as possible.

12. Changes

There may be times when changes to this Statement are necessary, e.g. ex. in the event of a legislative change, a modification of the way in which Cité Gestion processes Data, the evolution of Cité Gestion's activities or even the modification of its general conditions. In this case, Cité Gestion will publish the new version on its website. As a general rule, we also notify Data Subjects in the usual manner of communication when we make changes to this Statement.