

## **Personal data protection declaration**

This personal data protection declaration (hereinafter, the "**Declaration**") informs any person(s) concerned by data processing (hereinafter, the "**Person(s) Concerned**"), as well as any persons or entities about whom the Concerned Person or a third party provides information and/or of which Cité Gestion has knowledge in any other way (hereinafter, the "Related **Person**"), on how we collect, store and process this data. Unless otherwise stated, the Statement applies to any data processing carried out in the context of existing business relationships and/or relationships with potential customers, including when using our website and applications (hereinafter 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 its clients' personal data confidential and protecting their right to privacy. Given its activities and with regard to the data collected by Cité Gestion, the latter intends to apply the most restrictive principles and standards identifiable in terms of the protection of personal data.

Consequently, 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. Consent**

The Data Subject, by requesting or entering into a Business Relationship with Cité Gestion, and in accordance with the legal provisions in force, agrees to the fact that, within the framework of the Business Relationship, Data is collected and processed by City Management. Likewise, the Data Subject accepts the collection of Data concerning him or her from third parties.

By negotiating or concluding a mandate (asset deposit, asset management, investment advice, *family office*, or other) with Cité Gestion, the Data Subject accepts the collection and processing of their Data and adheres to this Declaration.

### **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 collected 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 Persons and Persons Related 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 applicable regulations (in particular: law on money laundering and application of related regulations, international financial regulations such as FATCA, automatic exchange of information taxes, etc.).
- weighing of interests, protection of the 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, sales of all or part of Cité Gestion's activities, IT security, building security (e.g. through badge systems or video surveillance) and installations.
- improving the website and communication using the collection of Data such as IP address in order to improve the provision of services and the proper functioning of the website. The processing of this Data is based on the legitimate interest of Cité Gestion.

#### **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 facilitate and improve your navigation on our website. The *cookies* that we may use aim to establish statistics and volume of traffic and use of the functionalities of our website, allowing us to improve its use.

The recording of a *cookie* on your terminal is, in principle, subject to your approval. Your acceptance of this Statement is deemed to be your consent to any use of *cookies* . .

#### **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):

- 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 number, email addresses, WhatsApp, etc.
- Financial data: identification and bank account numbers, financial means, assets, income, investments, debts, financial transactions.

- 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 Related Persons.

## 5.2. Information collected directly from Data Subjects

Cité Gestion collects and records all the information communicated to it in the context of the Business Relationship, in particular using its customer relationship management systems (CRM, PMS). 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 authorities competent 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 (business providers, trustees, administrators of private investment vehicles, lawyers, banks, other financial intermediaries, sanctions lists international, publicly available information [e.g. Bloomberg, World-Check, Factiva or LexisNexis ]). Data collected from third parties is treated in the same way as Data collected directly from Data Subjects (see paragraph 4.2 above).

## 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 and Related Persons 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 use an automated decision-making process in relation to a Business Relationship, a Data Subject or a Person Related to it.

## **8. Data Transmission**

The Data may be transferred abroad. However, we only transfer Data to states OUTSIDE Switzerland or the European Union if (i) there is appropriate data protection, comparable to that applied by Switzerland or (ii) the recipient concerned contractually undertakes towards Cité Gestion to ensure equivalent protection, (iii) such transfer results from a legal obligation of any nature whatsoever or is otherwise authorized.

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) 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.

We may also transmit Data to subcontractors, in particular to IT service providers and other service providers necessary for the provision of services.

## **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 professional secrecy and Data protection.

The Data of the Persons Concerned will be transmitted and stored on the Cité Gestion servers, access to which is strictly limited. Cité Gestion has taken appropriate technical and organizational precautions to guarantee access to the servers by duly authorized persons, as well as special precautions with regard to the protection of our technical environment (e.g. use of Firewalls) .

## **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; And
- right to request a ban on the processing of stored Data.

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](mailto: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](http://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](mailto: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.