

PRIVACY NOTICE FOR SELVI

Person responsible for personal data / Contact person

Within the framework of your business relationship with SELVI & CIE SA (hereafter « SELVI »), we process information and personal data related to you and/or any “Related party” (hereafter “Data Subject”). This data processing is made as a “Data Controller”. **The Data Protection Officer « DPO » of SELVI is the Chief Operating Officer.**

During the course of business, you provide us at times with information and/or, by other means, we receive information on another person related to your account. This person is a « Related party ». It can be (i) any director, officer or employee of a company, (ii) a Trustee, Settlor or Protector of a trust, (iii) any nominee or beneficial owner of an account, (iv) a substantial interest owner in an account, (v) a controlling person, (vi) a payee of a designated payment, or (vii) any representative or agent (e.g. holder of a power of attorney).

For this reason, we kindly ask that you contact all Related parties within the framework of your relationship with SELVI, so as to provide them with a copy of this Privacy Notice or inform them of its content (also available on SELVI’s website).

In case of any question relating to this *Privacy Notice* or the processing of your personal data (including that of your Related parties), you can contact your contact person within SELVI or our Data Protection Officer (DPO).

Personal data handling

Deriving from various applicable legislations, SELVI is subject to certain confidentiality/secretary obligations, notably data protection, contracts, professional secrecy and banking secrecy. Personal data processed within the framework of business relationships falls under the scope of these obligations, within the limits relevant to these legislations and regulations.

This *Privacy Notice* describes how your personal data is processed (i.e. collection, handling, use, storage, transmission). It does not replace our General Conditions and other contractual terms.

Transmission of certain personal data of SELVI’s clients can be mandatory within the scope of legal and regulatory obligations imposed on SELVI. Absence of reception of this data can imply the impediment/termination of the business relationship or the providing of certain services.

Data processing operations are usually directly handled by SELVI, but in certain circumstances can be subject to handling by third parties delegated by SELVI (« subcontractors »).

SELVI is only responsible for the Processing of personal data as per this Privacy Notice.

Processed Data

« Personal data » includes any information that enables one to identify directly or indirectly a natural person (e.g. name, surname, passport number or data combination).

Personal data of Data Subject processed by SELVI can include:

- Identification data (e.g. name, address, phone number, email address);
- Personal characteristics (e.g. date of birth, country of birth);
- Professional information (e.g. employment and job history, title, power of representation);
- Identifiers issued by public authorities (e.g. passport, identification card, tax identification number, national insurance number, social security number);
- Financial information (e.g. bank details);
- Investment data (e.g. investment profile, investment preferences, invested amounts, types of held investments, role in a transaction, detail of transactions);
- Information relating to the use of technologies such as websites and email addresses.

Purpose and legal Basis of Data Processing

Personal Data available to SELVI is processed for special purposes (hereafter « Purposes ») and in conformity with applicable legal basis.

Data Processing can derive from contract execution to which the Client (or a Related Party) is party to, legal or regulatory obligations applicable to SELVI, predominant public interest or pursuit of SELVI's legitimate interests.

The processing of Personal Data which is handled outside of legal or otherwise authorised framework, will be subject to prior consent thereto by the involved Data Subject.

The Processing Operations handled by SELVI include the following:

Contractual basis:

- Initiation of a business relationship, account opening and management, including all related operations for client and related party identification;
- Any related services provided by a subcontractor of SELVI within the framework of the business relationship;
- Management, administration of transactions and investments, including all ancillary services/obligations thereto related and identification of the person as an investor;
- Processing of subscription, conversion and redemption requests related to investment funds, as well as the maintaining of the ongoing relationship with respect to holdings in investment funds.

Legal and regulatory basis, including public interests' requirements:

- Comply with legal and regulatory requirements on financial markets and comply with accounting legislation;
- Provide offering documentation about products and services to Data Subjects;
- Carry out any form of cooperation with administrative authorities, surveillance authorities, police authorities and all/any other public authority, including the fact of communicating personal data and data related to the account held by the Client with SELVI within the framework of information requests related to money laundering issues, tax crime detection and all other Swiss or foreign applicable provisions to which SELVI is subject to in order to prevent tax evasion or fraud (e.g.: FATCA, automatic exchange of information).
- Prevention of fraud, bribery, corruption and the provision of financial or other services to persons subject to economic or trade sanctions, as well as retain any records produced in this context for screening purposes;
- Risk management within SELVI, including but not limited to operational and legal risks, as well as risks related to markets, credit, payment default, processes, liquidity and image;
- Record conversations with Data Subjects.

Legitimate interest basis:

- Assess certain characteristics of Data Subjects based on personal data automatically processed (Profiling, see point 5 hereafter);
- Develop business relationships with clients;
- Pursue/develop/improve/modify our commercial organisation and operations;
- Evaluate inherent risks related to our business and take decisions based on this evaluation;
- Establish, exercise and/or defend actual or potential legal claims, investigations or other similar proceedings;
- Record conversations with Data Subjects.

Profiling and automation

SELVI never takes automated decisions with respect to its business relationships or Data Subjects.

However, SELVI can be brought to assess certain characteristics of Data Subjects through Profiling, in particular so as to provide certain tailor-made services, advice or information relating to investments under the framework of applicable legislation and regulations.

In this context, SELVI can be brought to use specific technologies enabling to identify risk levels associated to Data Subjects or account activity.

Sources used for personal data collection

The sources used can derive directly from the Data Subjects and/or other external sources, such as information received from third parties, publicly available sources (e.g. published sanctions lists of SECO, UN, E.U.) or available through subscription (e.g. Bloomberg, World-check).

Sharing of personal data

Personal data is not shared with third-parties, except in cases where it is necessary or useful in terms of Purposes, under the condition that the communication is legally authorised or required, in particular:

- Disclosure to public administrations (including tax administrations), governmental administrations, courts, prosecution authorities, financial surveillance authorities or actors of financial markets (e.g. third-party or central depositories, brokers, exchanges, registers). In such cases, SELVI reserves the right to proceed with the said communications;
- Subcontractors authorised by SELVI who undertake to uphold the same level of data protection;
- Auditors or legal advisors.

Data transfer outside of Switzerland

Within the framework of a business relationship, SELVI can be brought to transfer personal data outside of Switzerland, in particular:

- In relation to the conclusion or execution of a contract directly or indirectly pertaining to the business relationship;
- In case of communication deriving from a predominant public interest;
- In cases duly planned for by the applicable legislations and regulations.

These international transfers may include transfers towards jurisdictions that (i) ensure an adequate level of data protection with regards to Data Processing, (ii) benefit from adequacy decisions with regards to their level of data protection, (iii) do not benefit from such adequacy decisions and do not offer an adequate level of protection. In the latter case, SELVI will only proceed to the transfer after reception of a specific instruction from the Client (e.g. transaction towards a country that does not benefit from an adequate level of data protection) or by ensuring that appropriate guarantees are provided.

Rights in connection with data protection

Subject to applicable legislations, the Client has the right, free of charge, to contact SELVI Data Protection Officer (subject to the local provisions on data protection) to:

- Request access to, and receive a copy of, all personal data held by SELVI;
- If appropriate, request a rectification or deletion of inaccurate personal data;
- Require personal data deletion when its processing is no longer necessary for the Purposes, or has become unlawful for other reasons (subject to mandatory conservation periods);
- Require a restriction to the processing of personal data where its accuracy is contested, where the processing is unlawful or if the Data Subject has objected to the processing;
- Oppose the processing of personal data (subject to SELVI's legitimate interests and legal obligations);
- Receive the personal data in a structured format (data portability rights);

- Case being, obtain a copy of the adequate guarantees received within the framework of the transfer of personal data outside of Switzerland;
- File a complaint with SELVI's Data Protection Officer in relation to the personal data processing;

SELVI does not use personal data for marketing purposes. Should this be the case, the Data Subject is entitled to require that SELVI abstains therefrom.

Absent a satisfactory resolution of an issue pertaining to personal data processing with SELVI, the Data Subject can file a complaint with the relevant data protection supervisory authority.

SELVI can process personal data, in spite of Data Subjects' opposition, in the following cases: (i) legal obligation, (ii) necessary processing for the performance of a contract, which the Data Subject is party to, (iii) necessary for the carrying out of a predominant public interest, (iv) necessary in view of SELVI's legitimate interests, including the establishment, exercise or defence of legal claims.

Conservation and archiving of personal data

Personal data is kept as long as necessary to satisfy the Purposes, subject to (i) legal or regulatory requirements to retain personal data for longer periods of time, (ii) conservation for legal purposes to preserve necessary information, (iii) necessary conservation in order to establish, exercise or defend SELVI's rights in actual or potential legal claims.
