

## Client information on data protection

B&P Beerli & Partner AG (hereinafter: the company) provides this client information document to inform you about the collection and processing of your personal data in relation to your asset management mandate.

### Identity and contact details of the data controller of the company

B&P Beerli & Partner AG  
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This privacy notice is in accordance with the Swiss Data Protection Act («DPA»). However, the application of this law depends on each individual case.

#### A. Collection and processing of personal data

Personal data includes any information relating to an identified or identifiable natural person. As part of your mandate, the company collects several types of your personal data. These include among others:

- Personal details (e.g. name, address, date of birth, civil status, profession)
- KYC information (e.g. source of wealth, profession, transaction details)
- Bank account information (e.g. IBAN)

This also includes all other information that you provide to us or is inevitably collected in the course of providing the agreed-upon service.

Insofar as it is permitted to us, we may also receive your personal data from affiliated companies, authorities, or other third parties (e.g., custodian banks). Apart from data you provided to us directly, the categories of data we receive concerning you from third parties include, but are not limited to:

- information from public registers
- information about you in correspondence and discussions with third parties
- information about you given to us by individuals associated with you (family, consultants, legal representatives, etc.) in order to conclude or process contracts with you or with your involvement (e.g. powers of attorney)
- information related to legal requirements such as for example anti-money laundering regulations
- information about you found in the media or internet (e.g. in connection with job applications, media reports, marketing/sales)
- data received in connection with administrative or court proceedings

## **B. Purpose of data processing and legal bases**

The company primarily uses collected data in order to perform the agreed-upon services vis-a-vis our clients and to procure products and services from our suppliers and subcontractors, as well as in order to comply with domestic and foreign legal obligations.

In addition, in line with the applicable law and where appropriate, we may process personal data for the following purposes that are in our interest (or, where applicable, in the legitimate interest of a third party), for example:

- Providing and developing our products, services and websites, apps and other platforms, on which we are active.
- Advertisement and marketing (including organizing events), provided that you have not objected to the use of your data for this purpose (if you are part of our client base and you receive advertisement, you may object at any time and we will place you on a list against further advertising mailings).
- Asserting legal claims and defense in legal disputes and official proceedings.
- Prevention and investigation of criminal offences and other misconduct.
- Ensuring the operation of our IT, websites, apps, and other devices.

## **C. Data subject rights**

In accordance with the applicable law, individuals whose personal data is processed (“data subjects”) are guaranteed a number of rights in relation to the processing of their data. It is important to the company that you can exercise your rights easily and transparently, should you wish to do so.

Among others, you have the following rights:

- The right to request and receive information as to whether and which of your data we are processing
- The right to have inaccurate or incorrect data corrected
- The right to object to all or specific instances of processing
- The right to request the deletion of your data
- The right to request that we provide you with certain personal data in a commonly used electronic format or transfer it to another data controller (data portability)
- The right to withdraw consent where our processing is based on your consent

To exercise these rights, it is necessary for you to provide proof of your identity (e.g., by a copy of identification documents where your identity is not evident otherwise or can be verified in another way). In order to assert these rights, please contact us in writing using the contact details provided above. It is important to note that we reserve the right to enforce statutory restrictions or exceptions in certain cases. For example, if we are obligated to retain or process specific data, have an overriding interest (insofar as we may invoke such interests) or need the data for asserting claims.

Please further note that the exercise of these rights may be in conflict with your contractual obligations, and this may result in consequences such as premature contract termination and

may involve costs. If this is the case, we will inform you in advance unless this has already been contractually agreed upon.

In addition, every data subject has the right to enforce his/her rights in court or to lodge a complaint with the competent data protection authority. The competent data protection authority in Switzerland is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

#### **D. Sharing data with third parties and transfer of data abroad**

In connection with our mandate and in accordance with the previously stated purposes of data processing, we may transfer data to third parties. Such transfers will occur when permitted and considered appropriate, either for the purpose of data processing on behalf of the Company or, as the case may be, their own purposes. Among others, the following categories of recipients may be concerned:

- Our service providers (e.g. custodian banks, risk management & compliance, IT-provider, data hosting providers, CRM-system)
- Domestic and foreign authorities, official bodies and courts
- Other parties involved in potential or ongoing legal proceedings

Certain recipients are located within Switzerland but others may be located in any country worldwide. In particular, you must anticipate your data to be transmitted to any country where our service providers are located.

If a recipient is located in a country without adequate statutory data protection, we require the recipient to undertake to comply with data protection. An exception may apply for example in case of legal proceedings abroad, but also in cases of overriding public interest or if the performance of a contract requires disclosure.

#### **E. Duration of data storage**

Your data, which includes personal data, will be processed and stored only for as long as necessary to fulfil our contractual and legal obligations or for the purposes stated in the data processing activities. This may include the entire duration of the business relationship and beyond, based on legal retention requirements and documentation obligations. It is possible that personal data will be retained for the time in which claims can be asserted against our company and insofar as we are otherwise legally obliged to do so, or if legitimate business interests require it (e.g. for evidence and documentation purposes). As far as possible, your personal data will be erased or anonymized within 12 months after the expiry of the above-mentioned periods.

#### **F. Changes to this information on data protection**

We may amend this information on data protection at any time without prior notice. The current version published on our website shall apply.