

Information on data protection under the Swiss Data Protection Act (LPD)

In the framework of its activities, Soave Private Investors SA (hereinafter also referred to as the “Company”, “OPERATOR” or “we”) processes data relating to natural persons and legal entities (hereinafter referred to as “personal data”). This personal data includes information on clients (current and past), potential clients, business partners and their employees, and any other person with which the Company (hereinafter also referred to as “You”) might have any dealings.

The Company complies with the laws and regulations in force to ensure the protection and confidentiality of personal data. This document provides an overview of how we process Your personal data and Your personal rights.

1. Types of data processed

The Company notably collects the following personal data, depending on the product or service provided:

- personal information such as name and surname, date and place of birth, nationality, registered address, gender, telephone number, postal address and e-mail address, as well as information relating to family members and those close to the person in question, such as the name(s) of their spouse/domestic partner and/or children;
- financial information, such as payment and transaction records, information regarding the client’s property (both movable and immovable), financial statements, liabilities, taxes, profits, gains and investments;
- tax residence and other tax documents and information such as the person’s tax code;
- professional information about the client, such as both past and present positions and professional experience;
- knowledge of and experience in the investment field;
- details of previous contact with the client and the products and services requested, along with details of any mandates issued;
- recordings of telephone conversations between the client and the Company;
- in some cases (where permitted by law), special categories of personal data, such as biometric data, political opinions and affiliations, health, and medical information, racial or ethnic origin, religious or philosophical beliefs and, insofar as permitted by law, data relating to any criminal convictions or offences.

In some cases, the Company may also collect such information by consulting public registers, public administrations, or other third-party sources such as the custodian bank. Where relevant to the services provided to its clients, the Company also collects information on any joint card or current account holders, partners (including other shareholders or beneficiaries), dependants and family members, representatives, and agents.

When a client accesses the Company’s website (www.soavepi.com), the data transmitted by their browser are automatically recorded by our server (including the date and time of access,

the name of the file viewed, the volume of data transmitted and access performance, as well as the client's browser, language and domain, and IP address). Additional data will be recorded via the Company's website only when voluntary consent is given, e.g. during a registration process or when submitting a request.

The Company may use cookies, tracking technologies and other means (e.g. web beacons, pixels, gifs, tags, unique identifiers, etc.) to collect and process the above information from various channels, including e-mails and devices that you might use to interact with us through our website. Regarding the use of cookies and other tracking technologies, please also refer to our cookie policy, which can be found here: www.soavepi.com.

2. Purpose of data processing and legal bases

The Company processes the aforementioned personal data in accordance with the provisions of the Swiss Federal Data Protection Act (LPD). Your personal data is always processed for a specific purpose and only insofar as is necessary to achieve that purpose. The main reasons for such processing of data are as follows:

2.1. Fulfilment of contractual obligations

Data are processed to provide financial services within the execution of contracts concluded with clients or to perform pre-contractual activities in anticipation of the conclusion of such contracts. The purposes for which data are processed will depend primarily on the specific service requested by the client and may include an analysis of needs.

2.2. Fulfilment of legal obligations

The Company is subject to various legal obligations (e.g. the Financial Institutions Act, the Money Laundering Act, the Financial Services Act), FINMA regulations, and any regulations imposed by the AOOS supervisory body with which the Company is affiliated that might require the processing of personal data.

2.3. Pursuit of legitimate interests

Where necessary, we process data beyond what is strictly necessary for the effective fulfilment of our contractual obligations for the purposes of pursuing our legitimate interests or those of a third party, provided that these do not override the interests, rights or fundamental freedoms of the client. In addition to the following examples, we also obtain personal data from publicly available sources for client acquisition purposes:

- to make legitimate claims and develop our defence in the event of litigation;
- to ensure IT security and the smooth functioning of the Company's IT systems;
- to prevent and identify any violations;
- video surveillance, for the purposes of preventing unauthorised access, gathering evidence in the event of theft or fraud, or ascertaining availability and deposits;
- measures designed to ensure the security of buildings and places (e.g. access control);
- measures designed to manage activity and further develop services and products.

Where the Company processes personal data in accordance with points 2.1, 2.2 and 2.3, it is not necessary to obtain the prior express consent of the data subject for the data to be processed.

2.4. Specific purposes

If the data subject has consented to the processing of personal data for specific purposes (analysis of trading activity for marketing purposes, etc.), the lawfulness of such processing is based on consent. The consent given may be revoked at any time.

3. Access to and protection of personal data

Within the Company, access to data is granted to employees who need it in order to fulfil contractual, legal or supervisory obligations. Any service providers and representative agents (typically providers of banking, IT, logistics, printing, telecommunications, collection, consultancy, sales or marketing services) that might be appointed by the Company may also receive data for these purposes, provided that they comply with the applicable data protection regulations.

With regard to the transfer of data to recipients outside the Company, it should first of all be noted that Soave Private Investors SA employees are obliged to ensure the confidentiality of any facts and assessments concerning the client of which they may become aware.

The Company is, under certain conditions, authorised to disclose information to third parties such as the following:

- public authorities and institutions (e.g. FINMA, supervisory bodies, audit firms, financial authorities or criminal prosecution authorities), provided that there are legal obligations to do so;
- other financial service providers, similar institutions and processors with whom we might share personal data in order to fulfil our mandate (support/maintenance of data processing/IT applications, archiving, document processing, compliance and risk management services, etc.).

Appropriate technical and organisational measures have been put in place to prevent any unauthorised or unlawful access to the personal data provided by clients.

4. Transfer to a third country

Data may only be transferred to countries outside Switzerland if this is necessary for the provision of the agreed service, if it is required by law (e.g. reporting obligations under tax law) or if the client has given their consent. If any service providers in a third country are used, they, too, are obliged to comply with the levels of data protection required in Switzerland.

5. Duration of storage

The Company retains personal data only for as long as necessary to achieve the purpose for which it was collected or to comply with the relevant legal, regulatory, or internal regulatory requirements. To this end, specific criteria are applied to determine the appropriate periods for retaining personal data based on the purpose, such as proper book-keeping, facilitating customer relations, defence in the event of legal action or responding to requests from the regulator. Generally speaking, the Company retains personal data for the duration of the relationship or contract plus a further ten years, which corresponds to the period of time during which a legal claim can be filed following the termination of such a relationship or contract.

Pending or threatened legal or regulatory proceedings may result in data being retained beyond said period.

6. Data protection rights

6.1. General

Every data subject has the right to be informed about their data, the right to have their data rectified or erased and the right to restrict and/or object to the processing thereof, as well as to have such data transferred as far as applicable. The right to complain to a competent data protection supervisory authority is also provided for, within the applicable limits.

The subject may withdraw consent to the processing of their personal data at any time. This withdrawal will apply only in the future, meaning any processing carried out prior to the withdrawal of consent will not be affected.

The rights of access, withdrawal and objection of each data subject are not absolute as they are not applicable in certain circumstances and may be subject to certain exceptions (e.g. for the fulfilment of legal obligations). We will follow up on any requests received in accordance with the applicable data protection regulations. Moreover, when a data subject exercises their rights, we may first ask them for proof of identity. We may also ask for further information in the event that the request is unclear. If we are unable to fulfil the request, we will provide an explanation for this.

Please use the contact details provided in Section 11 should you wish to exercise your rights.

6.2. Right to object to data processing for marketing purposes

In some cases, so far as we are required to process personal data for direct marketing purposes. The data subject has the right to object at any time to the processing of personal data for such purposes, including profiling insofar as it is related to such direct marketing. In the event that a data subject should object to the processing of their data for direct marketing purposes, their personal data are no longer processed for such purposes. Please use the contact details provided in Section 11 should you wish to file an objection.

7. Obligation to provide data

For the purposes of providing our service, the data subject is required to provide the personal data necessary to issue and perform the mandate and to fulfil the associated contractual and legal obligations. Without such data, we are theoretically unable to enter into or perform a contract with the client.

Specifically, the provisions of the Anti-Money Laundering Act require us to verify identity before entering into a business relationship. In order for us to comply with this legal obligation, data subjects are required to provide us with the necessary information and documents and to notify us immediately of any changes that may occur over the course of the mandate. Without the necessary information and documents, we are not permitted to provide our services.

8. Use of automated decision-making procedures

As a rule, the Company does not make decisions based solely on automated procedures when it comes to establishing and implementing business relationships. Should the Company use

such procedures in individual cases, it will inform those concerned separately, to the extent required by law. A right of objection will be granted under certain circumstances.

9. Profiling by the Company

In some cases, we automatically process client data for the purposes of assessing certain personal factors (profiling). The following are some examples:

- the law requires us to implement anti-money laundering and anti-fraud measures, as well as measures against the funding of terrorism and crimes that pose a threat to heritage. Data assessments might also be performed in such situations (in the case of payment transactions, for example);
- we may carry out client profiling in order to comply with regulatory and contractual requirements (e.g. for the purposes of determining the client's investment profile).

10. Data security

The Company implements appropriate technical (e.g. encryption, pseudonymisation, logging, access control, data back-up, etc.) and organisational measures (e.g. instructions for our employees, confidentiality agreements, inspections, etc.) to ensure the security of the information gathered and processed and to protect it against unauthorised access, misuse, loss, falsification and destruction. Access to personal data is permitted only in the event of actual need.

That said, it is generally impossible to completely rule out any security risk, since some residual risks are more often than not unavoidable. Since complete data security cannot be guaranteed when communicating by e-mail, instant messenger or similar means of communication, we advise you in particular to send confidential information by particularly secure means.

11. Data processor and contact details

The responsible unit is the Company's Data Protection Officer, whose contact details are as follows:

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