

Data Privacy Notice

1. General information

Loyal Finance AG (LF) takes the protection of your personal data and your privacy very seriously. The purpose of this Notice is to describe how LF collects and processes personal data in the course of its business activities. "Personal data" refers to any information relating to an identified or identifiable natural or legal person. The processing of such data includes any operation relating to personal data – regardless of the means and procedures used – and in particular the collection, recording, use, alteration, communication, archiving, erasure and destruction of data (non-exhaustive list).

Other regulations, such as conditions of use, conditions of sale and contractual conditions relating to specific situations, may be applicable to certain data processing, for example when concluding a contract with LF or in connection with LF web pages.

If you make personal data of other individuals (e.g. family members, co-workers) available to us, please make sure that these individuals are aware of this Notice. Please provide us with their personal data only if you are entitled to do so and only if such data are accurate.

2. Data security

LF undertakes to protect personal data and privacy in accordance with the Federal Act on Data Protection (FADP) and the Data Protection Ordinance (DPO). To this end, LF takes various security measures at the technical and organisational levels (e.g. access restrictions, firewalls, personalised passwords as well as encryption and authentication technologies, employee training, etc.) to ensure that the processing of personal data complies with the legal data protection requirements in force.

3. Personal data

The term "personal data" refers to any information that directly (e.g. first name, last name) or indirectly (e.g. a passport number) identifies an individual. LF primarily processes personal data provided by its clients and other business partners but also processes personal data of other individuals in the course of its business relations with them, and that of users during the operation of its web pages, applications and the like.

LF processes various types of personal data, including:

Type of personal data	Examples
Identifying data	Name, address, telephone number, e-mail address, professional contact information, photographs, video and audio recordings
Personal characteristics	Date, place, and country of birth
Means of identification issued by public authorities	Passport, identity card, tax identification number, social security number
Professional information	Professional experience, powers of representation, possible sanctions or proceedings
Financial information	Account history information, bank details
Information relating to transactions or investments	Current and past investments, investment profile, investment preferences, amounts invested, number and value of financial instruments held, role played in a transaction (seller / buyer), details of a transaction
Technical information	IP address, internal and external identifiers, access log
Business information	Preferences, needs

4. Origin of personal data

LF may process personal data from the following sources:

- Personal data provided directly by the data subject, for example when entering into a business relationship, executing a contract, looking to benefit from products and services and visiting websites.
- Personal data required for the use of products or services and transmitted to LF through digital or technological processes, such as through payment transactions, securities trading, e-banking, websites, partnering financial or IT service providers, marketplaces, and stock exchanges.
- Personal data from third-party sources, such as public sources (e.g. UN and EU sanctions lists) or other third parties (e.g. business providers, third-party managers).

5. Purposes of data processing

We use personal data primarily for the purpose of entering into and performing contracts with our clients and business partners, in particular in connection with the provision of financial services and the acquisition of products and services from our suppliers and subcontractors, as well as to comply with national and international legal obligations.

LF processes personal data for various purposes (objectives), including:

- The fulfilment of a contractual obligation
 - The initiation of the business relationship with LF, including all operations related to the identification of the data subject.
 - Any other financial service related to the business relationship, including financial services specifically requested by the Client.
 - The management of collective investment schemes, including services related to such activities.
- The fulfilment of a legal or regulatory obligation
 - The provision of information on LF products and services to the data subject.
 - The monitoring of compliance with legal obligations in the area of financial market regulation.
 - Any form of cooperation with competent authorities, in particular supervisory authorities, authorities responsible for combating money laundering and terrorist financing, and authorities involved in the automatic exchange of information in tax matters (including the Common Reporting Standard and the US Foreign Account Tax Compliance Act (FATCA)).
 - Any measure to implement international sanctions in accordance with the procedures established by LF, including the processing of personal data for screening purposes.
 - Any risk management measures, including market, credit, operational, liquidity, legal and reputational risks.
 - The recording of telephone conversations and electronic communications with data subjects in order to combat fraud and other criminal offences.
 - The assessment of risks to which LF is exposed and the decision-making process for risk management.
- LF's legitimate interest
 - Any processing aimed at developing the business relationship.
 - Any processing aimed at improving LF's internal organisation and procedures, including risk management.
 - The use of personal data for commercial canvassing (marketing), unless the data subject has refused the use of his or her personal data for this purpose.
 - Any processing necessary to enable LF to establish, exercise or oppose a current or future claim, or to enable LF to handle an investigation by a public authority, in Switzerland or abroad;
 - The recording of telephone conversations and electronic communications with data subjects for the purpose of protecting LF's interests, analysing and improving the quality of the services and products provided, training the company's employees or managing risks.

6. Transfer of personal data to third parties and third countries

LF reserves the right to share personal data with:

- Administrative authorities (e.g. prudential supervisory authorities), judicial authorities, financial market participants (e.g. operators of a financial market infrastructure [such as a stock exchange], brokers, bank correspondents, sub-custodians, issuers, and financial market supervisory authorities and representatives thereof).
- Subcontractors in the context of outsourcing.
- LF's auditors and certain LF service providers.
- Affiliated entities.

LF may disclose, transfer and/or store personal data outside Switzerland:

- In relation to the conclusion or performance of contracts directly or indirectly related to the business relationship (i.e. a contract concluded with a data subject or with a third party, but in the interest of a data subject), for example in the context of outsourcing.
- If such a transfer is necessary to safeguard the greater public interest.
- If such a transfer is necessary to enable LF to establish, exercise or oppose a current or future claim, or to enable LF to handle an investigation by a public authority, in Switzerland or abroad.
- In exceptional cases, when such a transfer is provided for by the applicable regulations (in particular in order to comply with obligations relating to the notification of stock market transactions).

If such a transfer of personal data is made to a country that does not offer an adequate level of protection of personal data (from a Swiss perspective), LF shall ensure, if required by the applicable regulations, that it obtains the consent of the Client or that it puts in place adequate safeguards, in particular contractual agreements, which may take the form of standard contractual clauses laid down by the European Commission. Any data subject may contact LF if he or she wishes to obtain additional information on this subject.

7. Automated individual decisions and profiling

LF does not use automated evaluations or profiling.

8. Use of the website and cookies policy

When an individual visits LF web pages, the server automatically records the details of the visit (e.g. the web page from which the visit took place, the visitor's IP address, the content accessed from LF's web site and the date and duration of the visit). This tracking data is used to optimise LF web pages and provides information on how visitors find out about LF products, services and offers and how they use them. In general, however, it does not allow the visitor's identity to be determined.

Therefore, no personal data is processed. If the visitor provides personal data, for example by filling in a registration form or a message field for the newsletter, LF may use this data for the following purposes (in addition to the purposes mentioned in point 5):

- client and user administration;
- informing the visitor about products and services;
- marketing (e.g. sending newsletters);
- technical hosting and the development of LF web pages.

During a visit to the LF website, visitor data are transmitted via the Internet, an open network accessible to everyone. Data transmitted electronically (including by e-mail) cannot be effectively protected against access by third parties. This entails in particular the following risks: disclosure of data or modification of content, usurpation of the identity of the sender (e.g. e-mail) and of the content of the message, manipulation of the latter by unauthorised persons, propagation of viruses, technical transmission errors, delays or interruptions, uncontrolled transmission of data abroad where data protection requirements may be less stringent than in Switzerland, etc. By using the LF website, visitors expressly accept this Notice and the aforementioned risks.

In addition, by using the LF website, a visitor agrees to the use of cookies. Cookies are small files that are stored on the visitor's computer to track the corresponding website visit and navigation between different pages and/or to save settings (e.g. selected language). Cookies are used to collect statistical data on the frequency and time of visits to individual website areas, and help to design tailored, useful and user-friendly websites. The visitor can decide against the use of cookies at any time by deleting the cookies set by the LF website. Deletion is possible via the settings in the visitor's Internet browser.

Occasionally, LF uses third-party components (such as plug-ins) to improve user experience and its online advertising campaigns. These components may also use cookies for similar purposes. Neither these third parties nor LF have access to the data collected by the other party through cookies. In addition, LF may use cookies in connection with LF advertisements published on third-party websites with which LF has a business relationship. If third parties collect anonymised information on the use of the LF website and other websites, LF may use such anonymised data to improve the effectiveness of its advertising activities.

Point 8 of this Notice applies only to data obtained by LF as a result of the use of the LF website. It does not apply to third party websites, even if the visitor accesses them through links on an LF website. LF has no influence on the content of third-party websites or the processing of personal data by these websites and therefore declines any liability in this respect.

9. Duration of storage

LF stores personal data for as long as necessary to fulfil its intended purpose. LF erases or anonymises personal data when they are no longer necessary to fulfil a purpose,

- subject to the legal and regulatory obligations applicable to LF regarding the storage of documents and information; and
- subject to cases in which a longer storage period is necessary to enable LF to establish, exercise or oppose a current or future claim, or to enable LF to handle an investigation by a public authority, in Switzerland or abroad (e.g. setting up a legal hold).

10. Data subject rights

Under the applicable regulations, every data subject has the following rights with regard to his or her personal data:

- the right to access his or her personal data;
- the right to have his or her personal data rectified if it is inaccurate or incomplete;
- the right to oppose the processing of his or her personal data;
- the right to request a limit on the processing of his or her personal data; and
- the right to request the deletion of his or her personal data when it is no longer necessary for the purposes for which it was collected or processed, or when the data subject has withdrawn his or her consent (in cases where the processing of the personal data in question is based on the consent of the data subject).

Every data subject may, at any time and without justification, object to the use of his or her personal data for commercial canvassing (marketing) purposes by LF or by third parties, and he or she may, where processing is legally based on consent, withdraw that consent, in writing to LF.

The exercise of some of the above rights may result in LF no longer being able to provide certain products or services.

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11. Additional information

LF, in its capacity as "owner of the file" / "data controller", can be contacted at the following address:

Loyal Finance AG
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8001 Zurich
Switzerland
Tel +41 (0)44 215 50 90
loyalfinance@loyalfinance.ch
www.loyalfinance.ch

If a data subject wishes to obtain further information on the topics dealt with in this Notice, he or she may contact the above address.

If you are not satisfied with LF's response, you have the right to contact the Swiss Federal Data Protection and Information Commissioner.

LF reserves the right to amend this Notice at any time.