

FIDEPAR S.A. – PRIVACY POLICY 2018 (Data protection)

We are committed to protecting your privacy – in this privacy policy, we set out how we collect your personal data, how we use it, and what rights and choices you have in relation to the personal data we hold and process.

What personal data might we collect?

We collect different types of personal data about you or any related person, namely: beneficial owner, Power of Attorney holder, employees, directors, shareholders, trustee, settlor, founder, beneficiary, controlling party, bank signatory, instructing party, party to a contract, service providers, nominees and any other person/ entity linked to the relationship we hold with you – this may include:

- **Contact information:** such as your name, job title, postal address, home address, business address, telephone number, mobile number, fax number, email address etc.
- **Compliance details, identification data and documents:** Information we are legally required to collect for compliance purposes, such as 'know your client' information (Passport, ID Cards, education, employment, tax status, family situation, financial data, business details etc.) and details relevant to international sanctions, restrictive measures and significant litigation information, which may impact our ability to act.
- **Payment data:** Data necessary for us to process payments and relevant billing details.
- **Publicly available information:** Information collected from publicly available resources, including but not limited to information collected from databases we use to carry out compliance checks.
- **Statutory Register Information:** Information about you on account of an interest or office you may hold in or relationships you may have with a corporate entity, trust or other vehicle to which we provide services.

When do we collect your personal data?

We may collect personal data about you in various cases, such as for example:

- when you or your organization seek our services – i.e. accounting and tax services, corporate administration and family office services, advice or any fiduciary services;
- when you make an enquiry in person, over email or over the telephone;
- when a third party entity engages us to provide services and you hold an office or an interest in or have certain relationships with that Third Party Entity; or
- when you provide services to us, or otherwise offer to do so.

How will we use your personal data?

We will use your personal data for the following purposes (Permitted Purposes):

- to provide corporate services you may have requested as instructed or requested by you, your organization or appointed instructing party;
- to manage and administer your business relationship with us, including processing payments, accounting, auditing, billing and collection or support services;
- for compliance with our legal obligations, compliance screening or recording obligations (such as international sanctions embargo laws, for anti-money laundering, fraud and crime prevention), which may include checks against applicable sanctioned-party lists and contacting you to confirm your identity in case of a potential match;
- to provide updates, reminders, requests and directions relevant to the role or capacity in which you are interested in a third party entity.
- to protect the security of and managing access to our premises, IT and communication systems, website and other systems, preventing and to detect security threats, fraud or other criminal activities;
- to monitor and assess compliance with our policies and standards;
- to identify persons authorised to act on behalf of our clients, and/or service providers;
- to comply with our legal and regulatory obligations/ requests anywhere in the world, including reporting to and/or being audited by national and international regulatory, law enforcement and tax reporting bodies;
- upon instruction or request from you or a relevant third party entity;
- to communicate with you through the channels you have approved
- to comply with court orders and exercises and/or defend our legal rights; and
- for any purpose related and/or ancillary to any of the above or any other purpose for which your personal data was provided to us.

Depending on for which of the above Permitted Purposes we use your personal data, we may process it on one or more of the following legal grounds:

- because processing is necessary for the performance of a client instruction or other contract with you or your organisation or a third party entity
- to comply with our legal obligations; or
- because processing is necessary for purposes of our legitimate interest or those of any third party recipients that receive your personal data, provided that such interests are not overridden by your interests or fundamental rights and freedoms.

We may also process your data based on your consent where you have expressly given that to us.

How/with whom will we share your personal data?

We may share your personal data in the following circumstances:

- among the employees of FIDEPAR S.A. and its partners on a confidential basis where this is required for providing our services, as well as for administrative, billing and other business purposes;
- to other corporate providers, other accountants, registered agents, legal advisors or experts engaged in your matter, domestically or abroad, when you are a FIDEPAR S.A. client, or you are otherwise contracted by, are an agent of, or otherwise represent a FIDEPAR S.A. client;
- with companies providing services for money laundering checks, credit risk reduction and other fraud and crime prevention purposes and companies providing similar services, including financial institutions.
- with courts, law enforcement authorities and regulators.

We will otherwise only disclose your personal data when you direct us or give us permission to do so, when we are required by applicable law or regulations or judicial or official request to do so, or as required for investigation purposes.

Can you refuse to share your personal data with us?

In general, we receive your personal data where you provide this on a voluntary basis. You may withhold your consent for it to be processed. However, there are certain cases where we will unfortunately be unable to act without receiving such data, for example where we need to carry out legally required compliance screening or require such data to process instructions or orders. Where it is not possible for us to provide you with what you request without the relevant personal data, we will let you know accordingly.

How do we keep your personal data safe?

We take appropriate technical and organisational measures to keep your personal data confidential and secure, in accordance with our internal policies and procedures regarding storage of, access to and disclosure of personal data. We may keep your personal data in our electronic systems, in the systems of our contractors, or in paper files.

Personal data we receive from you about other people

Where you provide us with the personal data of other people, such as beneficial owners of entities, employees of your companies, or other persons you may have dealings with, you must ensure that you are entitled to disclose that personal data to us and furthermore that, without being required to take further steps, we can collect, use and disclose that data in the manner described in this policy. More specifically, you must ensure that the individual whose personal data you are sharing with us is aware of the matters discussed in this Privacy Policy, as these are relevant to that individual, including our identity, how to get in touch with us, the purposes for which we collect data, our disclosure practices, and the related rights of the individual.

Transfers of personal data abroad

FIDEPAR S.A. is active across the world – this means that we may transfer your personal data abroad if required to do so for the Permitted Purposes. In certain cases, this may include transferring data to countries which might not offer the same level of protection as the laws of your country. When making such transfers, we will ensure that they are subject to appropriate safeguards required by applicable law to ensure the integrity and security of your personal data in accordance with the General Data Protection Regulation or other relevant data protection legislation.

How long do we keep your personal data?

We delete your personal data once it is no longer reasonably necessary for us to keep it for the Permitted Purposes, or, where we have relied on your consent to keep your personal data, once you withdraw your consent for us to do so, and we are not otherwise legally permitted or required to keep the data. For information, according to Swiss law, mandatory data should be kept for a period of 10 years.

What rights do you have?

Subject to certain conditions under applicable legislation, you have the right to:

- request a copy of the personal data which we hold about you;
- have any inaccurate data we hold about you corrected;
- object or restrict our use of your personal data;
- submit a complaint if you have concerns about the way in which we are handling your data.

To do any of the above, **please contact us at: FIDEPAR SA, Rue de Hesse 1, CH-1204 Geneva Attn: Data Protection Officer, dataprotection@fidepar.ch.**

To enable us to process your request, we may require that you provide us with proof of your identity. This is to ensure that we appropriately protect the personal data we hold from unauthorised access requests and comply with our security obligations. We may charge you a reasonable administrative fee for any unreasonable or excessive requests we may receive, and for any additional copies of the data you may request.

Correcting and updating your personal data - Your commitment

Where any personal data you have provided us with has changed, or where you believe the personal data we hold is inaccurate, please let us know immediately. In addition, please note that if you hold an office or are interested in or have certain relationships with a third party entity to which we provide services, you and/or the Third Party Entity may have a contractual or legal obligation to notify us of any change within a prescribed time period. We cannot be responsible for any loss that may arise due to us having any inaccurate, incomplete, inauthentic or otherwise deficient personal data which you or a third party entity have provided to us. Please also let us know if you wish to withdraw any request.

Changes to our Privacy Policy

This Privacy Policy was last updated on 24 May 2018. We have the right to update the contents of this Privacy Policy from time to time to reflect any changes in the way in which we process your personal data or to reflect legal requirements as these may change.