

## Privacy Notice

This privacy notice ("**Privacy Notice**") informs our website visitors, clients and business partners (or persons acting on behalf of our clients and business partners) and job applicants ("**you**") about how GLOBAL GATE ASSET MANAGEMENT SA ("**we**", "**us**") treats personal data ("**Data**") in accordance with the Swiss Federal Act on Data Protection ("**FADP**") and the EU General Data Protection Regulation ("**GDPR**"), as applicable, when using our website, when using any of our services/products ("**Services**"), when supplying services/products to us, when applying for a job vacancy or in any of the other situations set out in Section 3 below. Within the scope of the FADP, references in this Privacy Notice to the GDPR shall be understood as references to the corresponding provisions in the FADP.

### 1. Controller and Contact Details

Controller is GLOBAL GATE ASSET MANAGEMENT SA, Rue de la Rôtisserie 1, 1204 Geneva, Switzerland (email address: [info@globalgate-am.com](mailto:info@globalgate-am.com)).

### 2. Obligation to Provide Data and Your Sharing of Third-Party Data

You are in general under no obligation to provide us with any Data. However, if you do not provide the required information regarding certain use cases set out in Section 3, we may not be able to process your corresponding request, get in contact with you or provide the Services to you.

If you share with us Data regarding any other individual (e.g. regarding your employer/employees, relatives, family members, colleagues, ultimate beneficial owners, etc.), we assume that this Data is correct. By sharing such Data with us, you confirm that you are authorized to do so and that you have informed the affected individuals about this Privacy Notice and our processing of their Data.

### 3. Processed Data, Purpose and Legal Basis

#### 3.1 In General

We may process various categories of Data, depending on the circumstances as set out hereinafter. To the extent required under the GDPR, our processing is generally based on:

- a) the need for performance of our contract with you or for processing your request for a contract (Art. 6(1)(f) GDPR; e.g. in relation to services/products provided by us or supplied by you), and in particular, in the case of a mandate, for the performance, execution and monitoring of investment transactions;
- b) the need for compliance with legal obligations to which we are subject (Art. 6(1)(c) GDPR; e.g. in order to comply with statutory requirements, directives and recommendations from authorities);
- c) legitimate interests in fulfilling the purposes mentioned below (Art. 6(1)(f) GDPR; e.g. for security and access control purposes as well as to comply with internal regulations, including such purposes as compliance, risk management, corporate governance and business organization); and/or
- d) as otherwise specified hereinafter.

### 3.2 Website Use

The Data processing related to your use of our website is limited to Data that is required to operate, provide and secure the website and the services provided thereon ("**Website Use Data**") and for web analysis purposes ("**Website Analysis Data**").

Categories of Data: When accessing our website (and, through our website, the Services), the following information about your device may be collected automatically: IP address, operating system, type of device, browser name and version, date and time of access, address of the website from which you were redirected to our website (if applicable), etc. We may analyze your use of our website with web analysis tools. Further information on the use of data by Google and configuration options can be found here: <https://www.google.com/intl/en/policies/privacy/partners>.

Purpose and legal basis: The processing regarding website use is based on our legitimate interest to operate and secure our website and our Services, in particular for security reasons to ensure the stability and integrity of our systems (Art. 6(1)(f) GDPR). In addition, we may perform basic web analysis based on our legitimate interest (Art. 6(1)(f) GDPR) to optimize the website regarding usability and to gain insights about the use of our website and Services. The collected data will not be merged with other personal data or disclosed to third parties.

### 3.3 Cookies

Website Analysis Data may also be collected via the use of cookies. Cookies are small files that are managed by your browser and are directly stored on your device whenever you visit our website. You can disable the use of cookies in the preferences of your browser, but this might result in not all functions of our website or Services being available to you or functioning properly anymore.

Categories of Data: Website Use Data, Website Analysis Data.

Purpose and legal basis: We may use cookies on our website to ensure a user-friendly experience (e.g. session cookies), based on our legitimate interest (Art. 6(1)(f) GDPR). Enhanced web analysis using cookies is, within the scope of applicability of the GDPR, based on your consent (Art. 6(1)(a) GDPR).

### 3.4 Communication

We may be in contact with you by use of different channels, e.g. if you send us emails or by using other electronic (or hardcopy) communication means, whereby Data may be exchanged ("**Communication Data**").

Categories of Data: If you send us an email or another form of electronic message (or a hardcopy message, e.g. a letter), we may collect such information as your name, email address (or other form of communication identifier, e.g. messenger nickname), phone number, subject matter, message content, related metadata and any other information you choose to disclose in your communication to us.

Purpose and legal basis: We use Communication Data to process your inquiry and any possible further questions you might have in relation to the performance of our Services (Art. 6(1)(b) GDPR) and any other related questions and matters based on the content of your communication with us (Art. 6(1)(a) GDPR). We may keep this data to document our communication with you, for training purposes, for quality assurance, for follow-up inquiries (Art. 6(1)(f) GDPR) and for regulatory purposes (Art. 6(1)(c) GDPR).

### 3.5 Marketing, Events and Newsletters

We may process your Data for marketing purposes and relationship management, including events and newsletters, as well as online meetings or conferences via Zoom or other providers ("**Marketing Data**").

Categories of Data: Marketing Data may in particular include your contact information (e.g. name, company type and name, business function / title, email, address, etc.) and further data categories such as your preferences (e.g. your areas of interest), information relating to your participation in events (including photos), online meetings or conferences and to your use of our newsletters, references provided by you (e.g. for recommendations) as well as Communication Data.

Purpose and legal basis: We process Marketing Data for marketing purposes and relationship management, for example to send personalized advertising for our services and products, e.g. in the form of newsletters or other regular contacts either in person, via email or other electronic form, by phone or any other communication channel for which we have contact information from you and by any other marketing means (e.g. through events, etc.), or to publish photos of events on our website and in other media. We do so based on our legitimate interest to keep you and other interested parties informed about our products and services (Art. 6(1)(f) GDPR), to the extent permitted by applicable marketing regulations, or, where required, based upon your consent in this regard (Art. 6(1)(a) GDPR). In either case, you can object at any time, or refuse or withdraw your consent to be contacted for marketing purposes.

### 3.6 Services

When using our Services, you may be required to register, e.g. by opening an account or creating a login, and we may collect further Service related Data, including Contract Data (as defined in Section 3.7), in relation to the Services (altogether "**Service Data**", including Registration Data and Usage Data as defined hereinafter).

Categories of Data: When registering for our Services, you may be required to open an account or create a login, for which we may require such information as for example first name, last name, username, password, email, etc. This may also include further information we require from you in order to be able to provide you with the Services, e.g., depending on the Service, such further information as address, phone number, date of birth, nationality, identity document details, profession, role and function, financial details (such as income information, assets owned, portfolio information, investment information and tax status etc.), client history, etc., including information from third parties and public sources (e.g. from fraud prevention or government agencies, internet sites and government registries) ("**Registration Data**"). Furthermore, when using our Services, we may process information relating to transactions (e.g. dates, currencies, individual transactions, investment orders and instructions etc.) and record calls, emails, text messages, social media messages and other communications (including related metadata) between you and us. We may also analyze your use of our Services in order to get to know you better and tailor our Services to you, by collecting data about your behavior and preferences, including supplementing such data with third-party information, including from public sources (altogether "**Usage Data**").

Purpose and legal basis: In general, Service Data will be used to provide our Services to you (Art. 6(1)(b) GDPR) and to comply with the applicable legal requirements and our internal regulations, including for anti-money laundering and fraud prevention purposes (Art. 6(1)(c) GDPR and Art. 6(1)(f) GDPR). We may also process Service Data to document our Service delivery, for training purposes or for quality assurance as well as for market research to improve our Services and operations and for product development, based on our legitimate interest (Art. 6(1)(f) GDPR).

### 3.7 Contracts

If we enter into a contract with you, or into negotiations regarding such contract, we may collect Data in relation to the conclusion and performance of such a contract ("**Contract Data**"). In general, we collect this Data from you or other contractual partners and from third parties involved in the performance of the contract, but may also use Data from third-party or public sources (for example fraud prevention agencies and government registries).

Categories of Data: Contract Data may include Registration Data, Service Data in general and such further information as e.g. relating to the Services to be provided, to your preferences or to your feedback, etc.

Purpose and legal basis: We use Contract Data for the preparation, conclusion, performance and administration of our contractual relationships and any questions or inquiries that might arise in that relation (Art. 6(1)(b) GDPR). Such processing may be required to comply with legal requirements and internal regulations, including Know Your Client processes (Art. 6(1)(c) GDPR and Art. 6(1)(f) GDPR). We may keep this Data to document our communication with you, for training purposes, for quality assurance and for follow-up inquiries (Art. 6(1)(f) GDPR).

### 3.8 Job Applications

We may process Data you provide to us in connection with an application for a job vacancy ("**Application Data**").

Categories of Data: Application Data may in particular include your contact information, information about your working permit situation, your education and professional experience and any other information you choose to provide to us in connection with your application.

Purpose and legal basis: We process Application Data for the assessment of your application and potential negotiation, preparation, conclusion and performance of an employment contract with you (Art. 6(1)(b) GDPR). In case no employment contract is concluded, but you provide us with your consent to retain your application for further job vacancies, we may do so based on your consent (Art. 6(1)(a) GDPR).

### 3.9 Profiling

We may use your Data to automatically evaluate personal aspects relating to you (so-called "**Profiling**") but will not use it for automated decision making.

Categories of Data: Depending on the specific circumstances, the Data categories listed in this Section 3 may be used for Profiling.

Purpose and legal basis: Profiling may be performed for the purposes set out in this Section 3, in particular in order to determine preferences, to detect misuse and security risks, to perform statistical analysis or for operational planning (Art. 6(1)(f) GDPR). Profiling will only be used to gain a better understanding of certain aspects and will not lead to automated individual decision making.

#### 4. Disclosure and Transfer of Data

We may disclose your Data to recipients as set out in Section 4.1, which may include cross-border data transfers as further described in Section 4.2.

##### 4.1 Categories of Recipients

We may make your Data available to the following recipients (in compliance with the applicable legal requirements):

- a) Other involved parties (where relevant, e.g. for the purpose of executing a transaction in the services we provide to you, if a person has power of attorney over your affairs or if the Services require the disclosure of certain Data to counterparties, legal representatives, banking companies or other companies in relation to the provision of asset/wealth management, consulting, investment solutions and related services);
- b) our group and affiliated companies;
- c) external service providers (e.g. IT services providers, business information providers, etc.);
- d) competent authorities, including tax authorities and courts (in Switzerland and abroad, if we are legally obliged or entitled to such disclosure or if it appears necessary to protect our interests);
- e) legal and professional advisors, including accountants and auditors;
- f) transaction partners and advisors (e.g. in relation to mergers, acquisitions or other business transactions involving us or our group companies).

##### 4.2 Cross-Border Transfer of Data

We may transfer your Data to countries within the EEA or to the UK and to the countries outside of Switzerland or the EEA/UK, such as the Cayman Islands, based on your consent.

#### 5. Storage Periods and Erasure

We process and retain Data for as long as our processing purposes, the legal retention periods and our legitimate interests regarding documentation require it or for reasons of limited technical feasibility. Except in case of contrary legal or contractual obligations, we will erase or anonymize your Data once the storage or processing period has expired. Regarding specific use/Data categories, we will in general retain your Data as follows:

- **Website Use Data**: Website Use Data will be processed for as long as required to enable the requested access and secure the stability and integrity of the relevant systems.
- **Website Analysis Data**: Website Analysis Data will be stored for as long as required to perform the analysis and will thereafter be deleted or anonymized.

- **Cookies:** Cookies will be stored on your device for the time period required to achieve the related purpose and will thereafter be deleted by your browser.
- **Communication Data:** Communication Data will be deleted after responding to / completing your inquiry if and to the extent (a) we are not legally obliged to retain such Data (e.g. for accounting or document retention purposes) and (b) we do not have an overriding legitimate interest to retain such data for documentation, quality assurance or similar business purposes or for the assessment or exercise of, or defense against, legal claims.
- **Marketing Data:** We generally keep Marketing Data for as long as necessary to achieve the respective purposes. Such Data will be deleted thereafter if and to the extent (a) we are not legally obliged to retain such Data (e.g. for accounting or document retention purposes) and (b) we do not have an overriding or legitimate interest to retain such Data for documentation, quality assurance or similar business purposes or for the assessment or exercise of, or defense against, legal claims.
- **Service Data:** We generally keep Service Data as long as you are accessing/receiving (or have the right to access/receive) our Services, and such Data will be deleted after termination of your contract and/or deletion of your account if and to the extent (a) we are not legally obliged to retain such Data (e.g. for accounting or document retention purposes) and (b) we do not have an overriding legitimate interest to retain such data for documentation, quality assurance or similar business purposes or for the assessment or exercise of, or defense against, legal claims.
- **Contract Data:** We generally keep Contract Data for the duration of the statute of limitations duration regarding contractual claims, as calculated from the end of the contractual relationship if and to the extent (a) we are not legally obliged to retain such Data (e.g. for accounting or document retention purposes) for a longer period and (b) we do not have an overriding legitimate interest to retain such Data for documentation, quality assurance or similar business purposes or for the assessment or exercise of, or defense against, legal claims.
- **Application Data:** We generally keep Application Data for the duration of the application process and 3 months thereafter, unless you ask or allow us to retain your application for a longer time. We may retain Application Data for longer for the assessment or exercise of, or defense against, legal claims.

## 6. Your Rights as the Affected Data Subject

You have the right to request information about your Data we process and further rights regarding such data processing. In particular, you have – or may have, depending on the circumstances – the right to:

- a) **Information**, i.e. to ask us whether we are processing Data about you, and if so, to provide you with further information related thereto.
- b) **Correction**, i.e. to ask us to correct or complement your Data if it is incorrect or incomplete.
- c) **Deletion**, i.e. to delete your Data (to the extent we are not under a legal obligation or have an overriding legitimate interest to retain such Data).

- d) **Object**, i.e. right to object to the processing of your Data based on our legitimate interest (Art. 6(1)(f) GDPR) by explaining your particular reasons and specific circumstances on which your objection is based. Regarding cookies through which certain Data may be collected, you can block the setting of such cookies at any time by changing the settings in your browser accordingly. Please note that a deactivation of cookies may result in a limited user experience and you may not be able to use every function of our website or Services or to access the Services in an appropriate manner altogether.
- e) **Restrict processing**, i.e. to ask us to temporarily restrict our processing of your Data.
- f) **Data portability**, i.e. to ask us to provide you in electronic form (to the extent technically feasible) the Data you have provided to us.
- g) **Withdraw your consent**, i.e. to withdraw your consent if and to the extent you have previously given your consent to any specific purpose of processing of your Data. This will not affect the lawfulness of any processing carried out before you have withdrawn your consent (or any processing based on any legal basis other than your consent) and it may mean that we will no longer be able to provide our Services to you.

In case you wish to exercise any of these rights, please contact us as specified in Section 1. Before responding to your request, we may ask for proof of identity. This helps us to ensure that your Data is not disclosed to any unauthorized person.

## 7. Data Security

We have put appropriate technical and organizational security policies and procedures in place to protect your Data from loss, misuse, alteration, or destruction. We limit access to personal data in general.

## 8. Complaints / Regulatory Authority

If you believe that our processing of your Data contradicts the applicable data protection laws, you have the possibility to lodge a complaint with the appropriate data protection authority.

The data protection authority for GLOBAL GATE ASSET MANAGEMENT SA is the Swiss Federal Data Protection and Information Commissioner (FDPIC), Feldeggweg 1, 3003 Berne, Switzerland (<https://www.edoeb.admin.ch>). Based on your place of residence, you may also have the possibility to lodge a complaint with the appropriate data protection authority of your place of residence.

## 9. Changes to this Privacy Notice

This Privacy Notice does not form part of any contract with you, and we may amend it at any time. The version published on our website is the version that currently applies.

Last update: November 2023