

Preamble

This document reflects the DNM Swiss AG Group's policies in terms of processing of personal data.

Notwithstanding anything, contained herein, the DNM Swiss AG strictly applies the data protection rules that are in force in the jurisdictions where DNM Swiss AG is established.

We kindly ask you to read the following text, issued by DNM Swiss AG, carefully. It provides you with important information with regards to the processing of personal data by DNM Swiss AG and to the rights granted to any identified or identifiable natural or legal person whose data are processed (the "Data Subjects"). Please note that in certain jurisdictions, e.g. in the EEA, the Applicable Legal Regulations does not apply to data pertaining to legal persons and the thus the relevant terms defined herein are to be understood as referring solely to natural persons.

DNM Swiss AG acting as data controller

DNM Swiss AG
Talstrasse 82
8001 Zürich
Phone

Contact details of the DNM Group Data Protection Officer

DNM Swiss AG
Group Data Protection Officer
Talstrasse 82
8001 Zürich
Phone
Email: group-dataprotection@dnmswiss.com

Categories of Data Subjects whose personal data are processed

Within its business activity, DNM processes personal data of the categories of Data Subjects listed below:

a) Natural or legal person maintaining a contractual relationship with DNM (hereinafter referred to as "the Contracting Party") or natural or legal person being in contact with DNM prior to entering into a contractual relationship with DNM (hereinafter referred to as "the Prospect"), e.g.:

- holder or potential holder of a bank account
- person receiving or intending to receive discretionary -management services or advisory services
- business introducer or potential business introducer
- employee at DNM or job candidate

b) Natural or legal person related to a Contracting Party or a Prospect (hereinafter referred to as "the Related Person"), e.g.:

- Director, board member of a legal entity
- trustee, settlor, protector of a trust
- member of the council, founder of a foundation
- direct or indirect shareholder, beneficial owner, controlling person of a legal entity
- beneficiary of a trust or a foundation
- authorized signatory on a bank account
- person receiving correspondence

- person to be contacted in the event of loss of contact with the Contracting Party
- family member, friend, lawyer, consultant, adviser, etc. of a Contracting Party or of a Prospect
- authorized representative and staff of directors, councils of foundations, trustees, protectors, authorized signatories, in case that these are legal entities
- authorized representatives and staff of external asset managers
- authorized representative and staff of institutional clients, fund distributors, corporate fund investors, fund providers, banking infrastructure clients, etc. to whom DNM provides products and services
- authorized representative and staff of service providers, vendors, counterparties, brokers, traders, etc. rendering services to DNM.
- authorized representative and staff of law firms, consulting firms, advisors, etc., mandated by DNM

c) Natural or legal person not maintaining a contractual relationship with DNM but being for other reasons in contact with DNM (hereinafter referred to as "the Other Data Subject"), e.g.:

- potential client
- authorized representative and staff of third-party banks and financial service institutions
- authorized representative and staff of professional associations
- any person contacting DNM for whatever reason

Categories of personal data collected from Data Subjects

Personal data means any data that identifies a person or that allows, together with other information, for the identification of a person, e.g.:

- personal details, e.g. name, address, phone number, fax number, e-mail address, date of birth, place of birth, nationality(ies)
- identification numbers, e.g. passport number, ID-number, TIN-number
- personal background, e.g. professional activity, public function
- family situation, e.g. marital status, number of children, number of grand-children
- economic data, e.g. financial assets, origin of funds
- contract data, e.g. mandates granted to DNM
- account information, e.g. account number, IBAN number
- due diligence information, e.g. results of anti-money-laundering checks, credit checks
- investment related information, e.g. investment profile, risk profile, suitability test, asset allocation, investments
- transaction data, e.g. payment instructions, investment instructions
- personality profiles, such as with regards to behavior and moods
- online identifiers, e.g. IP address and information on how the Data Subject uses the DNM website, including tracking information related to opening/deletion/reading of our marketing emails.
- physical data, e.g. CCTV footages, pictures
- records of telephone calls
- additional data with regards to DNM's employees, staff and job candidates, e.g. CV, job references, education, trainings, job performance, absence due to illness, holidays, business trips.

DNM limits the type and amount of personal data collected to the level required for the provisions of our services and in line with our obligations

Legal basis for and purpose of processing of personal data

DNM Swiss AG always processes personal data for a specific purpose. In particular for:

- a) The fulfilment of contractual obligations
- b) Personal data is processed to provide financial intermediary services such as asset management, investment

- c) advisory, investment reporting, concierge, etc. or pre-contractual clarifications (hereinafter altogether "services").
- d) b) The context of balancing and / or public interests
- e) Where required, personal data is processed for legitimate interests pursued by DNM Swiss AG or a third party, due to statutory provisions or in the public interest. In particular for:
- f) meeting regulatory and other compliance obligations (laws applicable to financial service providers (e.g. anti-money-laundering, record keeping and / or monitoring reasons), disclosure obligations towards tax authorities,
- g) regulators, other authorities and administrative bodies;
- h) valuation and enhancement of IT security and IT operation;
- i) risk control and security reasons of contracting parties, employees and shareholders of DNM Swiss AG.

Personal data transfer and sharing

Personal data concerning a Data Subject are disclosed by DNM in compliance with the Applicable Legal Regulations. DNM may have to disclose personal data to the following persons / parties:

DNM staff members - DNM has taken appropriate technical and organizational measures to ensure that personal data are only disclosed to staff members (i.e. employees) which are assigned to fulfill, on DNM's behalf, the contractual, legal and supervisory obligations to which DNM is submitted in the context of disclosing personal data.

The staff members, to which personal data are disclosed, are contractually submitted to the applicable legal confidentiality requirements and to banking and business secrecy.

Third parties - Personal data of DNM's staff members may be disclosed to Data Subjects, e.g. to Contracting Parties, Prospects, Related Persons, Other Data Subjects.

Third party processors - DNM may disclose personal data to a third party that acts as data processor for DNM within delegation and outsourcing relationships (e.g. Entities pursuing asset management-activities, cloud service providers, IT systems providers, email delivery service providers or IT development providers).

DNM contractually obliges this third-party processor to take appropriate technical and organizational measures to ensure that personal data are only disclosed to staff members of the third-party processor that are responsible for the execution and implementation of the contract concluded between DNM and the third party processor.

Other third parties - DNM discloses personal data to third parties other than data processors in order to fulfill its legal and regulatory obligations as well as its obligations arising from contracts that it maintains with its Contracting Parties.

Third parties in this respect are for example:

- National and foreign judicial, administrative or supervisory authorities
- National and foreign brokers, stock exchanges
- National and foreign central banks, correspondent banks, depository banks
- National or foreign transaction registers, central trade repositories
- Issuers of the securities or products, collective investment vehicles and their agents
- Brokers
- Counterparties
- Auditors, professional advisers, lawyers

Legal obligation of Data Subject to provide personal data to DNM Swiss AG

In order to enter into a contractual relationship with DNM and to maintain a contractual relationship with DNM, the provision of certain personal data is a legal and/or contractual requirement. According to the Applicable Legal Regulations in terms of anti-money laundering and terrorist financing, DNM is in particular obliged to identify its contracting party and the beneficial owner or controlling person of the assets that are deposited with or managed by DNM.

DNM is also legally obliged to keep personal data up to date, so that the relevant Data Subject is obliged to communicate to DNM any change that occurs in respect to the relevant personal data.

Consequences of failure to provide personal data to DNM Swiss AG

Where the Contracting Party is not willing to provide the required personal data to DNM before entering into a contractual relationship, DNM will not be in a position to conclude a contract.

Should the Contracting Party not communicate the necessary personal data to DNM during the existence of a contractual relationship with DNM, DNM may have to terminate such a contractual relationship

How long will personal data be stored

DNM Swiss AG will only retain personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or contractual requirements. To help us doing so, we apply criteria to determine the appropriate periods for retaining personal data depending on its purpose (e.g. account maintenance, facilitating client relationship management, responding to legal claims and / or regulatory requests). In general, DNM Swiss AG retains personal data for the entire duration of a business relationship plus 10 years since its termination. A longer retention period might be required in case of an ongoing legal and / or regulatory proceeding.

Rights of the Data Subject

Each Data Subject whose personal data is processed by DNM may be entitled to exercise, always within the limits of the relevant Applicable Legal Regulations, the below mentioned rights in respect to the processing of its personal data.

Any request should be addressed to the DNM Group-Data Protection Officer.

- Right to request access to and receive a copy of the personal data
- Right to request rectification
- Right to request erasure
- Right to request a restriction of processing
- Right to request objection to processing
- Right to request data portability
- Right to not be subject to a decision based solely on an automated processing, including profiling
- Right to lodge a complaint with a supervisory authority

Exercising rights and complaints

In case a data subject is not satisfied with any aspect of the processing of his / her personal data by DNM Swiss AG, the data subject can contact us by email at:

group-dataprotection@dnmswiss.com

or via mail at:

DNM Swiss AG
Talstrasse 82
8001 Zurich
Switzerland

In case DNM's response is not satisfactory, the data subject may file a complaint to the data protection authority in the jurisdiction of his / her domicile or in the jurisdiction where the data subject believes an issue in relation to his / her personal data has arisen

Status of this Privacy Notice

DNM may change the content of this Important Information from time to time and at its sole discretion, in particular if the legal basis for processing personal data is amended or if the processing of personal of data by DNM is subject to modifications.

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