

1. General information

This Data Protection Notice is provided by AMP PARTNERS SA (hereafter “AMP” or “we”), a Swiss limited company (*société anonyme; Aktiengesellschaft; società anonima*) with registered seat at rue des Alpes 3, 1201 Geneva, Switzerland, and registered with the Commercial Register of the Canton of Geneva under number CHE-105.461.797.

AMP is a Swiss independent asset management firm, authorized by the Swiss Financial Market Supervisory Authority (FINMA) and supervised by the SO-FIT (Supervisory Organization for Financial Intermediaries & Trustees), which provides financial services (such as investment advisory and asset management services) in Switzerland.

In the course of our activities, we may be required to collect and process information relating to identified or identifiable natural persons (hereafter “**Personal Data**”), such as our current or prospective clients, natural persons related to business relationships (e.g. authorized representative, person holding a power of attorney or beneficial owner) or our employees or candidates.

We are committed to maintaining the highest standards of confidentiality and integrity in all our operations. This Data Protection Notice outlines our unwavering dedication to safeguarding your Personal Data and explains the measures we take to ensure that they remain protected at all times.

2. Who is responsible for the processing of your Personal Data?

Unless communicated otherwise, the controller of the data processing described in this Data Protection Notice is:

AMP PARTNERS SA
Rue des Alpes 3
1201 Genève

3. How is your Personal Data collected?

Your Personal Data is primarily obtained directly from you, through our contractual documentation, forms and communications (letters, email exchanges, meetings, telephone calls, etc.).

We may also collect Personal Data about you from external sources, including publicly available sources (e.g. internet, press, sanctions lists), information available through subscription services (e.g. Bloomberg, World-Check, Factiva or LexisNexis) or through other third parties (e.g. from your custodian bank or a business introducer and, for employees or candidates, from previous employers or headhunters).

If you provide us Personal Data about third persons, we assume that you are authorized to do so and that you have informed such third persons about this Data Privacy Notice.

4. Why are you required to provide your Personal Data?

We ask you to provide the Personal Data necessary for the acceptance and execution of your business relationship with us and for the fulfilment of the associated contractual and/or legal obligations. If you do not provide the Personal Data, we will most likely be unable to enter into a contractual relationship with you and/or provide the agreed services.

Furthermore, as a financial intermediary, we are subject to certain obligations under the regulations on combating money laundering and the financing of terrorism, in particular to verify your identity based on your identification document and, in this context, to collect and store your name, date and place of birth, address, nationality, as well as identification data prior to entering into a business relationship. If you refuse to provide the required information, we will not be able to commence or continue a business relationship with you.

Finally, as an employer, we are subject to insurance, tax and social security regulations that require us to collect Personal Data about our employees such as, but not limited to, name, address, date of birth, nationality and marital status.

5. What kind of Personal Data is processed?

The amount and type of Personal Data that we collect largely depends on the nature of your business relationship with us.

For **prospective clients**, we generally collect and process limited personal details and identification data (e.g. name, address, telephone number, email address, occupation, interests and preferences, business connections).

For **current and former clients**, we collect and process a larger amount of Personal Data, the extent of which also depends in part on the services provided, that includes the following:

- your personal details and contact information (e.g. your, address, telephone number, email address, date and place of birth, nationality, occupation, interests and preferences, which may include sensitive data such as biometric information, data on religious, philosophical, or political opinions or activities, health-related information and records of legal or administrative actions or sanctions);
- your identification details (e.g. specimen signatures, ID documents, tax identification number);
- personal and identification details about affiliated third parties such as beneficial owners, employees, family members, authorized signatories, agents, and/or representatives;
- financial information (e.g. bank accounts, bank statements, credit reports, financial situation (sources of income, wealth, living expenses and costs) and investment objectives as well as knowledge and experience about the financial services);
- communications and interactions with us and custodian banks (e.g. letters, emails, faxes, telephone call recordings and reports as well as visit reports);
- Personal Data generated from the performance of our contractual obligations and compliance with legal obligations, especially concerning services or transactions (e.g. account, deposit, and transaction details, including information about the sender and recipient, powers of attorney, and related inquiries);
- Personal Data collected and automatically recorded through the use of our website or any other electronic service offered by us (e.g. date and time of access, type of device, web browser, browser language, requesting domain, IP address, the names of downloaded files and the volume of data transferred); and
- any other Personal Data similar to the above-mentioned categories.

Finally, for **candidates and employees**, we generally collect the following Personal Data:

- your personal details and contact information (e.g. name, address, telephone number, email address, date and place of birth, marital status, family details, household composition and gender);
- your identification details (e.g. as digital signatures, ID documents, work/visa status, tax status);
- financial information (e.g. your salary and other benefits as well as your bank account details); and
- health-related information (e.g. accidents, sick or maternity leave or any information about an inability to work);
- your application file (e.g. resume, employment and education history, professional qualifications, educational certificates, references and interests/hobbies);
- background check prior to starting employment where legally permissible and in acknowledgment of your consent (e.g. checks on employment history, educational credentials, criminal records, credit history, and debt collection register details);
- assessments to evaluate your skills and performances (e.g. internal notes on role suitability, interview feedback or annual review);
- recordings (e.g. video surveillance footages, telephone recordings, emails exchanges); and
- any other Personal Data similar to the above-mentioned categories.

6. Why is your Personal Data processed and on what basis?

We always process your Personal Data for specific purposes and limit the processing to what is necessary to fulfill the intended purposes. We generally process your Personal Data for the purpose of ensuring proper performance of our services based on our contractual obligations, in compliance with our legal or regulatory obligations, as well as in our legitimate interests.

We collect and process your Personal Data to meet our **contractual obligations** (it being specified that some of these processing operations may also be based on other justifiable grounds), including:

- to establish and set up a client relationship with us, including all procedures related to your identification;
- to manage and maintain your client relationship, ensuring the provision of agreed-upon services, and responding to your requests and queries;
- to provide tailored and personalized investment advice and portfolio management, executing transactions, and managing investments as per the strategies and objectives agreed upon;
- to communicate with you about our services, provide regular updates, and inform you of any changes or opportunities relevant to your investment strategy;
- to generate and provide reports on service performance, transaction history, and other account-related information as required by the service agreement; and
- to calculate fees, issue invoices, and process payments related to the services provided.

We also collect and process your Personal Data in order to meet our **legal or regulatory obligations** (it being specified that some of these processing operations may also be based on other justifiable grounds), including:

- to conduct necessary due diligence under anti-money laundering and combating the financing of terrorism laws and regulations, including verifying your identity and monitoring transactions;
- to comply with financial and securities regulations relevant to the asset management sector, provide you with detailed information before offering any financial service and assess the appropriateness and/or suitability of our investment advices;
- to report relevant information to the competent tax authorities as required under applicable tax laws and regulations, in particular under the automatic exchange of information in tax matters (including the Common Reporting Standard and the US Foreign Account Tax Compliance Act (FATCA));
- to comply with international sanctions, including monitoring transactions and implementing necessary measures to prevent and detect any prohibited activities;
- to monitor and, if necessary, report trading activities to ensure compliance with insider trading laws and regulations;
- to maintain records of our interactions, transactions, and other relevant activities for a period as required for audit and review purposes;
- to respond to subpoenas, court orders, administrative assistance or requests from competent authorities;
- to conduct risk assessments and reporting on risks as required by financial and banking regulations.

Finally, we collect and process your Personal Data in order to protect **our legitimate interests** (it being specified that some of these processing operations may also be based on other justifiable grounds), including:

- to manage and maintain existing relationships with you, including communications and interactions that are not strictly contractually required but are necessary for good customer relations;
- to conduct direct marketing activities for new client acquisition and informing existing clients about additional services or investment opportunities that could be of interest;
- to identify, prevent, and mitigate financial and operational risks, including fraud detection and prevention strategies;

- to ensure the security of our network, information, and property, including preventing unauthorized access and damage;
- to perform data analysis and business intelligence to improve our services, efficiency, and client satisfaction, as well as for our general business strategy and development purposes;
- to establish, exercise, or defend legal claims, whether in court or out-of-court proceedings; and
- to develop new services or enhancing existing services to meet your needs and preferences more effectively.

If we process Personal Data for purposes other than those listed above, we will inform you in advance and, if necessary, request your consent.

7. Do we use profiling or automated individual decision-making?

We do not engage in profiling or automated decision-making that has a legal or similarly significant effect on you, without first obtaining your explicit consent.

8. How is your Personal Data protected?

All our employees accessing your Personal Data must comply with our internal guidelines and procedures designed to protect them and ensure their confidentiality.

We have also implemented adequate technical and organizational measures to protect your Personal Data against a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, your Personal Data transmitted, stored or otherwise processed.

9. Is your Personal Data communicated to third parties?

In the course of conducting our usual business, your Personal Data may be communicated to third parties in order to provide you with the agreed services, to comply with a legal or regulatory obligation, or to follow one of your instructions with your consent. The recipients of such Personal Data may be:

- other credit or financial institution, such as you custodian bank, brokers, clearing agencies, trade repositories, transfer agents, administrators, issuers, investment funds, stock exchanges, and other institutions to execute transactions and provide a comprehensive range of financial services;
- regulatory and government bodies to comply with legal or regulatory obligations such as tax, anti-money laundering and/or financial supervisory laws;
- our external service providers, including IT, legal, and audit professionals;
- our affiliated entities; and
- other third parties as you may instruct us (e.g. other advisors or family members).

10. Is your Personal Data communicated outside Switzerland?

Your Personal Data is in principle not communicated outside Switzerland, unless this is necessary to deliver our services. In such case, we generally only transfer your Personal Data to countries which legislation is considered to provide an adequate level of data protection. In the absence of such legislation, we may transfer your Personal Data based on appropriate safeguards (e.g. standard contractual clauses or another statutory exemption).

11. How long is your Personal Data stored?

Your Personal Data is retained only for the period necessary to serve the purposes for which it was collected, typically for the duration of our business relationship and as required by legal or regulatory obligations.

12. What are your rights?

Under the relevant data protection laws, you have the following rights:

- to obtain confirmation as to whether or not Personal Data concerning you are being processed and to request a copy of such Personal Data (**Right of access**);
- to obtain the rectification of inaccurate Personal Data (**Right to rectification**);
- to obtain the erasure of your Personal Data when we are not legally required or permitted to retain it (**Right to erasure** or **Right to be forgotten**);
- to obtain the restriction of the Personal Data processing (**Right to restriction of processing**) where (i) you contest the accuracy of your Personal Data, (ii) the processing is unlawful, (iii) we no longer need your Personal Data for the purposes of the processing or (iv) you have objected to the processing of your Personal Data;
- to receive the Personal Data which you have provided us, in a structured, commonly used and machine-readable format or have it sent to a third party (**Right to data portability**); and
- to object, on grounds relating to your particular situation, at any time to the processing of your Personal Data which is based solely on our legitimate interest or processed for direct marketing purposes (**Right to object**).

13. Whom should you contact?

To exercise any of the above-mentioned rights or for any privacy-related question or concern, please contact us at:

AMP PARTNERS SA
Rue des Alpes 3
1201 Genève
Email: privacy@amp-partners.com

* * * * *

We reserve the right to amend this Data Protection Notice from time to time and will inform you of such an amendment in an appropriate manner.