

Data Privacy Statement

In this Data Privacy Statement, bank zweiplus Ltd (the "**Bank**") would like to outline how it collects, processes and protects personal data about the following persons: (i) prospective clients, (ii) natural persons that have or are in the process of applying for an account with the Bank ("**Clients**") (iii) individuals whose information is provided by a Client to the Bank or comes otherwise to the Bank's knowledge in connection with services provided by the Bank to a Client ("**Connected Individuals**") and (iv) Bank's website visitors, social media users, authorized representatives and staff of third parties such as services providers, vendors, counterparties, brokers, traders, etc., rendering services to the Bank or placing transactions from or to the Bank ("**Third Parties**"). A Connected Individual may include, but is not limited to, (i) any director, officer, authorized signatory or employee of a company, (ii) a trustee, settlor or protector of a trust, (iii) any beneficial owner of Client's assets, (iv) a controlling person, (v) a payee of a designated payment, (vi) representative(s) or agent(s) of a Client, (vii) a co-obligor under a loan (e. g. guarantor of a credit) or (viii) any other individual having a relationship with a Client that is relevant to this Client's business relationship with the Bank. Furthermore this Data Privacy Statement shall also inform Clients, Connected Individuals, prospective clients and Third Parties of their rights in relation to personal data collected and processed by the Bank. Please note: Which specific personal data are processed and how they are used depends largely on the products and services the Bank provides you with in each case.

In this Data Privacy Statement:

- "**you**" or "**your**" means, where relevant, as a reference to a prospective client, a Client and any Connected Individual as well Third Parties as defined herein;
- "**personal data**" means all information relating to an identified or identifiable natural/individual person. It includes any data that can be used to directly or indirectly identify a person;
- "**processing**" means any operation with personal data, irrespective of the means and the procedures applied, and in particular the collection, recording, storage, use, modification, disclosure, archiving, deletion or destruction of personal data;
- "**controller**" means the Bank or any other private person (e.g. natural person, legal entity) or state bodies that alone or jointly with others decides on the purpose and the means of the processing. Please refer to section 1 below for further information about the Bank as controller;
- "**processor**" means a private person (e.g. natural person, legal entity) that processes personal data on behalf of the controller.

If the Bank provides separate or further information about how it collects and uses Clients', Connected Individuals' or Third Parties' personal data for a particular product or service, those terms will also apply. Furthermore this Data Privacy Statement continues to apply even if Client's agreements for banking or other products and services with the Bank end.

If you provide the Bank with personal data of other persons (such as Connected Individuals or Third Parties), you shall ensure that the respective persons are aware of this Data Privacy Statement and that you only provide the Bank with their data if you are allowed to do so and such personal data is correct.

This Data Privacy Statement is aligned with the Swiss Data Protection Act ("**DPA**") and the EU Data Protection Regulation ("**GDPR**"). However, the application of these laws depends on each individual case.

Please familiarize yourself with this Data Privacy Statement and also forward it to any Connected Individuals before the Bank is provided with personal data of such Connected Individual.

1. Who is responsible for the processing of your personal data and who can you contact in this regard?

The controller (and sometimes as joint controller) of data processing as described in this Data Privacy Statement is bank zweiplus Ltd (with registered address at Buckhauserstrasse 22, 8048 Zürich, Switzerland).

You can contact the Bank on any data protection related matters, using the following contact details of the Bank's Data Protection Officer:

bank zweiplus Ltd
Data Protection Officer
Buckhauserstrasse 22
CH-8048 Zurich
Switzerland

E-Mail Address: dataprotection@bankzweiplus.ch

The Bank's representative in the EEA is Banque J. Safra Sarasin (Luxembourg) SA, 17-21, Boulevard Joseph II, L-1840 Luxembourg.

2. What sources and personal data does the Bank collect and use?

The personal data the Bank collects about Clients, Connected Individuals, prospective clients and Third Parties come from different sources. This includes personal data relating to the business relationship or a prospective business relationship with the Bank or any of the Bank's products or services that the Client or a Connected Individual or prospective client has applied for or held previously.

Some of the personal data will come directly from the Client, the Connected Individual, the prospective client or the Third Party. Some might be obtained from an independent asset manager, another advisor, a business introducer or from other third parties. Personal data might also come from other J. Safra Sarasin Group¹-entities, or the Bank might obtain such personal data lawfully by accessing publicly available sources or combining different sets of information.

Personal data collected may include, in particular:

a) Information that a Client, a Connected Person or a prospective client provides to the Bank such as:

- Contact details (e.g. name, address and other contact details such as date and place of birth, and nationality);
- Information about a Client, a Connected Person or a prospective client given to the Bank by filling in forms or by communicating with the Bank, whether face-to-face (including image captured by the video surveillance system of the Bank's premises), by phone (including voice and video recording), e-mail, on-line or otherwise;
- Information concerning a Client's, Connected Person's or prospective client's identity (e.g. passport information which does also contain a photograph) or which is relevant for authentication purposes (e.g. sample signature).

b) Information that the Bank collects or generates about the Client, a Connected Person or a prospective client, such as:

- Client relationship data (e.g. products held and services rendered), securities and payment transaction data and other financial information;
- Information regarding a Client's, a Connected Person's or a prospective client's financial situation such as credit data (e.g., information regarding Client's creditworthiness, individual credit application history);
- Information the Bank collects or generates to comply with its obligations under the anti-money laundering regulatory framework (e.g. information on origin of assets, beneficial ownership);
- Information the Bank collects or generates for risk management purposes such as client due diligence data (including periodic review results), client risk profiles, data to assess suitability/appropriateness, client qualification data (e.g. status as qualified investor), screening alerts (transaction screening, name screening), tax data or complaint information;
- Geographic information;
- Information included in relevant client files and client documentation and other comparable information;
- Marketing and sales information (e.g. newsletters, documents received, invitations to and participations at events and special activities, personal preferences and interests, opt-in and opt-out declarations);
- Information used in 'cookies' and similar technologies on websites, mobile applications and in emails to recognize a data subject, remember a data subject's preferences and show a data subject content the Bank thinks he/she is interested in.

c) Information about the Client, a Connected Person or a prospective client that the Bank collects from other sources, for example:

- Communication information (e.g., IP address, information contained in emails, chat messages or other digital communications);
- Information from publicly available sources and combined information from external sources (e.g. any country sanctions' lists, KYC compliance due diligence web database and search engines (e.g. Worldcheck), corporate and media broadcasts, information pertaining to social interactions between individuals, organizations, prospects and other stakeholders acquired from companies that collect combined information).

¹ This includes entities of J. Safra Sarasin Holding Ltd Group in Switzerland and abroad.

d) Information that the Bank collects about/from Third Parties, such as:

- Contact details of Third Parties engaged in the business relationship with the Bank (e.g. name, job role, contact details, place and date of birth, and nationality);
- Information about a Third Party by filling in forms, entering into or performing a contract, or by communicating with the Bank, whether face-to-face (including image captured by the video surveillance system of the Bank's premises), by phone (including voice or video recording), e-mail, on-line or otherwise;
- Information concerning a Third Party's identity (e.g. passport information which does also contain a photograph) or which is relevant for authentication purposes (e.g. sample signature).

In certain limited circumstances, the Bank may collect sensitive data about you (also called "special category data"), such as for example information relating to your political affiliations for the Bank to determine whether you are a politically exposed person or any information about criminal records for KYC and compliance purposes or biometric data (e.g. in connection with online identification process). Sensitive data includes different types of data relating to racial or ethnic origin, political opinions, religion or similar beliefs, trade union affiliation, physical or mental health data, criminal records, administrative proceedings and sanctions. Should you provide the Bank with sensitive data for any reason, the Bank acknowledges this as your explicit consent to process that data in the way as described in this Data Privacy Statement.

The Bank may also collect and process additional personal data about which the Bank will inform you from time to time.

3. What data the Bank may collect when you are visiting our website or social media pages?

The Bank uses "cookies" and similar techniques on the Bank's websites and E-Services mobile application, which allow for an identification of your browser or device. A cookie is a small text file that is sent to your computer and automatically saved by the web browser on your computer or mobile device, when you visit the Bank's website or install the Bank's E-services mobile application. For further information about our use of cookies, you can read the Bank's cookie policy available at www.bankzweiplus.ch.

In addition, when visiting the Bank's social media pages (e.g. LinkedIn, YouTube), the Bank may collect data about your activities on those pages.

Furthermore, the Bank may use plug-ins from social media network such as LinkedIn on the Bank's website. This is visible for you (typically based on the respective symbols). In general, these elements are configured as disabled by default. If you activate them (by clicking on them), the operators of the respective social networks may record that you are on the Bank's website and where on the Bank's website you are exactly and may use this information for their own purposes. This processing of your personal data lays in the responsibility of the respective operator and occurs according to its data protection regulations. The Bank does not receive any information about you from the respective operator.

4. What does the Bank process personal data for (purpose of the processing) and on what legal basis?

The Bank processes personal data of Clients, Connected Individuals, prospective clients and Third Parties for various purposes in accordance with the provisions of the Swiss DPA and the European GDPR and only uses such personal data where the Bank has a lawful basis for using it. The lawful basis and purposes include processing:

a) For the fulfillment of contractual obligations

The processing of personal data is carried out in order to perform banking transactions and financial services pursuant to contracts with the Bank's Clients and their Connected Individuals or to take steps prior to entering into a contract (e.g. with prospective clients).

The purposes of data processing are primarily dependent on the specific product (e.g. bank account, credit, securities, deposits, payments) and can include needs assessments, advisory, asset management and other financial or support services, as well as the carrying out of transactions. Additional details about the purposes of data processing may also be included in the applicable contractual or product documentation.

b) In the context of balancing interests and the purposes of safeguarding legitimate interests respectively

Where required, the Bank processes personal data beyond the actual fulfilment of the contract for the purposes of safeguarding the legitimate interests pursued by the Bank or a third party (including the entities of the J. Safra Sarasin Group). For Example:

- Reviewing and optimizing procedures for needs assessment for the purpose of direct client discussions;

- Keep track of the Bank's conversations with Clients, Connected Individuals and prospective clients (by phone, in person, by email or by any other kind of communication);
- Asserting legal claims and mounting a defense in the event of legal disputes;
- Correspond with legal advisers and third party intermediaries;
- Manage the Bank's internal operational requirements for credit and risk management, system or product development and planning, insurance, audit and administrative purposes;
- Consulting and exchanging data with information offices (e.g., debt register) to investigate credit-worthiness, determine credit or default risks in the credit business and determine requirements for an account maintained with a basic non-seizable balance or a basic payment account;
- Ensuring Bank 's IT security and IT operations;
- Prevention and solving of criminal offenses;
- Video surveillance to safeguard Bank's premises against trespassers, for collecting evidence in the event of hold-ups or fraud, or to document disposals and deposits;
- Measures for building, site and systems security (e.g. access controls);
- Measures for ensuring the right of owner of premises to keep out trespassers;
- Measures for business management and further development and improvement of services and products;
- Risk control in the J. Safra Sarasin Group;
- Marketing or market and opinion research, to the extent that Clients, Connected Individuals and prospective clients have not objected to having their personal data used;
- Gather insights from information through data analytics and for statistical purposes;
- Complying with applicable Swiss and other legal statutory and regulatory requirements.

c) On the basis of your consent

Insofar as you have granted the Bank consent to process your personal data for specific purposes (e.g. analysis of transactional activities for marketing purposes), this processing is lawful on the basis of your consent. A consent given may be revoked at any time. Please be advised that a withdrawal of consent does not affect the lawfulness of the processing of data prior to revocation of such consent. Note however that the Bank may still be entitled to process your personal data if it has another legitimate reason for doing so.

d) Due to legal obligations or in the public interest

Furthermore, the Bank is subject to various legal obligations, i.e. statutory requirements (e.g. the Banking Act, Collective Investment Schemes Act, Anti-Money Laundering Act, Mortgage Bond Act, ordinances and circulars of regulatory authorities and tax laws) as well as bank regulatory requirements. Purposes of processing include for example assessment of creditworthiness, identity and age verification, fraud and money laundering prevention measures, fulfilment of control and reporting obligations under fiscal and other laws, and measuring and managing risks within the Bank and the J. Safra Sarasin Group (including for consolidated supervision purposes).

The Bank may also collect and process additional personal data for other purposes about which the Bank will inform you from time to time.

5. Who does the Bank share your personal data with? Is your personal data disclosed abroad?

Within the Bank, various units are given access to personal data of Clients, Connected Individuals, prospective clients and Third Parties in order to perform the Bank's contractual and statutory obligations or as further described in this Data Privacy Statement.

In the context of the Bank's business activities and in line with the purposes and legal grounds of the data processing set out in section 4 above, the Bank may transfer data (incl. personal data) to third parties, insofar as such a transfer is permitted and the Bank deems it appropriate, in order for them to process data for the Bank or, as the case may be, their own purposes.

With regard to transferring data to other recipients outside the Bank, to begin with, it is to be noted that, as a bank, the Bank is generally obliged to maintain secrecy about any customer-related facts and evaluations which the Bank may acquire or have knowledge of (banking secrecy). The Bank may pass on information about you only if legal provisions demand it, if you have given your consent (e.g. to process a financial transaction a Client or Connected Individual has ordered the Bank to perform), and/or if the Bank is authorized to provide information. In other words, the Bank will always do this in a way that is permissible under data protection laws and regulations.

If a recipient is located in a country without adequate statutory data protection, the Bank requires the recipient to undertake to comply with data protection standards (for this purpose, the Bank namely uses the revised European Commission's standard contractual clauses), unless the recipient is subject to a legally accepted set of rules to ensure data protection or unless the Bank can rely on an exception, all in order to ensure that your personal data continues to receive appropriate protection. An exception may apply for example in case of a legal proceedings abroad, but also in cases of overriding public interest or if the

performance of a contract requires disclosure, if you have consented or if data has been made available generally by you and you have not objected against the processing.

Under these conditions, the Bank may disclose your personal data, in particular, to the following categories of recipients:

Types of third parties receiving data	Purpose of the transfer	Location of the third parties receiving data
Other companies within the J. Safra Sarasin Group	For risk control purposes due to statutory or other obligation or for the purpose of outsourcing data processing activities within the J. Safra Sarasin Group mainly in the categories of banking services, IT services, logistics, printing services, telecommunications, advice and consulting, as well as sales and marketing;	See list of companies and their location on the BJSS-Group's website ²
Clients, Connected Individuals, Joint account holders, trustees, beneficiaries, power of attorney holders or executors	For the performance of contractual or legal obligations under the business relationship with the Bank	The countries where the concerned third parties are located
Any independent asset manager who provides asset management or advisory services to you and any other financial intermediary or business introducer who introduces you to the Bank or deals with the Bank for you	For the performance of contractual or legal obligations under the business relationship with the Bank	The countries where the independent asset managers or other financial intermediary you have appointed or business introducer are located
Other financial service institutions, comparable institutions, payment recipients, beneficiaries, intermediaries, custodians, correspondent and agent banks, market counterparties, clearing houses, clearing or settlement systems, brokers, stock exchanges, information offices, service providers, companies that you holds securities in, credit/debit card processing suppliers	To enable the performance of the business relationship with you, including to follow your instructions, provide services to you and handle any of your transactions	The countries where the relevant third parties are located
Other credit and financial service institutions, fraud prevention agencies, credit rating agencies and debt recovery agencies	To determine your ability to meet financial commitments. To take appropriate steps should you be unable to repay an amount owed to the Bank following a demand for repayment	The countries where you or the relevant third parties are located or domiciled
Companies, issuers of securities, investment funds	To fulfill disclosures request of certain issuers of securities to receive personal data relating to the beneficial owner of the funds invested	The country in which the company, the issuer or the investment fund is domiciled
Storage and documentation companies	To allow for files to be held securely off-site or to perform destruction of files.	Switzerland
Third parties involved in the IT services, such as the maintenance and operation of IT systems, development and maintenance of databases, software and applications, the development and imple-	To maintain and operate our IT systems and consequently the provision of services to you (to the extent possible and as appropriate, personal data such as names and addresses will be rendered anonymous if trans-	Switzerland and Europe

² www.jsafrasarasin.com/content/jsafrasarasin/language-masters/en/company/locations.html

mentation of processes and guidelines to ensure and/or improve the availability, integrity and security of data	ferred to third parties. Account numbers may be made available in certain circumstances)	
Third parties involved in the completion of certain administrative or logistical tasks, or the provision of other specific services such as the preparation of tax statements.	To render certain services you have requested (to the extent possible and as appropriate, personal data such as names and addresses will be rendered anonymous).	Switzerland
Third parties involved in the mailing to the clients of bank documents (such as the Bank's correspondence with the clients, including transaction advices, statements of account, summaries of assets and tax statements), such as the public post companies (e.g. Swiss Post) and other postal companies (e.g. DHL)	To provide the Bank's services you have requested (you may always opt for our e-Services if you want to avoid the sharing of your data in this respect).	The countries where you and the relevant post companies are located or domiciled and/or any transit country
Third parties involved in specific activities, particularly those relating to information and communication technologies (e.g. phone, email, chat, videoconferencing, co-browsing).	To render technological services you have requested (your personal details may be accessible to such third parties during the chat/videoconference, phone or email-exchange etc. and for a limited time thereafter).	The countries where you and the third parties are located at the time of the communication (including the US in connection with the use of Webex)
Professional advisors, consultants or Law firms/entities providing legal advice	To assist the Bank in running your account and provide services to you as well as in obtaining professional legal advice in respect of the services we provide you with	The countries where the legal or dispute issue arises or has a connection with
Auditors	To comply with any legal or regulatory obligations as well as defend the legitimate interests of the Bank	Switzerland
Other parties in possible or pending legal proceedings	To comply with any legal or regulatory obligations as well as defend the legitimate interests of the Bank	The countries where the concerned other parties are located, but primarily Switzerland and Europe
Domestic and foreign authorities, courts or arbitral tribunals (e.g. the Swiss National Bank, Swiss Financial Market Authority (FINMA), other financial authorities, tax authorities, criminal prosecution authorities)	To comply with any legal or regulatory obligations the Bank has as well as defend the legitimate interests of the Bank	The countries where the concerned authorities, court or arbitral tribunals are located

The aforementioned table is a general description of the various scenarios where the Bank may share data. Additional recipients of personal data may also be those for which you have given your consent to transfer your personal data or with respect to which you have exempted the Bank from banking secrecy by agreement or consent. All these categories of recipients may involve third parties, including sub-processors of personal data, so that your data may also be disclosed to them. The Bank can restrict the processing by certain third parties (for example IT providers), but not by others (for example authorities, banks).

As indicated in the above table, certain recipients may be within Switzerland but some may be located in other countries, including countries in Europe and the USA.

You can obtain more details of the protection given to your information when it is transferred outside Switzerland by contacting the Bank in accordance with the information provided in section 1 above.

6. How long will personal data be stored?

The Bank will process and store personal data of Clients, Connected Individuals, prospective clients or Third Parties for as long as it is necessary in order to fulfil the Bank's contractual and statutory obligations. It

should be noted here that the business relationship with the Bank is a continuing and long term obligation, intended to last for several years.

If the personal data are no longer required in order to fulfil contractual or statutory obligations, they are regularly deleted, unless their further processing – generally for a limited time - is required for the following purposes:

- Compliance with records retention periods under commercial and tax law: this includes for example the Swiss Code of Obligations (CO) and its related relevant ordinances, the Federal Act on Value Added Tax (VATA), the Federal Act on Direct Taxation (DTA), the Federal Act on Harmonization of Direct Taxes of Cantons and Municipalities (THA), the Federal Act on Stamp Duties (SDA) the Federal Act on Withholding Tax (WTA), the Swiss Bankers Association's Guidelines on the treatment of assets without contact and dormant assets held at Swiss banks (Guidelines on Dormant Assets).
- Preservation of evidence in accordance with statutes of limitations.
- Compliance with special retention scenario, such as «legal holds», i.e. processes put into effect by the Bank in order to preserve all forms of relevant information when litigation is reasonably anticipated or ongoing. In such cases the Bank might be required to keep the information for an undefined period of time.

7. What data protection rights do you have?

Under the applicable data protection laws you may have the following rights:

- Right of **access**
- Right to **rectification**
- Right to **erasure**
- Right to **restriction of processing**
- Right to **object** to the data processing
- Right to **data portability**.

If GDPR is applicable to you, you also have:

- Right to object to the processing of data for direct marketing purposes
You have the right to object at any time to processing of personal data concerning yourself for such marketing, which includes profiling to the extent that it is related to such direct marketing. If you object to processing for direct marketing purposes, the Bank will no longer process your personal data for such purposes.

The right of access and the right to erasure are subject to certain restrictions. In case you exercise your right to restrict or object to the processing, the Bank will no longer process your personal data, unless the Bank can demonstrate mandatory legitimate grounds for the processing which override your interests, rights and freedoms or unless the processing is for the establishment, exercise or defense of legal claims. Please note, that in such cases the Bank will not be able to provide services and maintain a business relationship with you either.

You shall address any request in that regard to the Bank's Data Protection Officer as mentioned under section 1 above.

Furthermore, if applicable on a person, there is also a right to **lodge a complaint** with an appropriate data privacy supervisory authority.

Where the Bank processes personal data based on your granted consent, you may revoke your consent specifically granted to the processing of personal data at any time. Please be advised that the revocation will only take effect in the future. Any processing that was carried out prior to the revocation shall not be affected thereby. Please note however that the Bank may still be entitled to process your personal data if it has another legitimate reason for doing so.

8. How is personal data kept secure?

The Bank implements internal technical and organisational measures to keep personal data of Clients, Connected Individuals, prospective clients and Third Parties safe and secure which may include encryption, anonymization, access limitations and physical security measures. The Bank requires its employees and any third parties who carry out any work on the Bank's behalf to comply with appropriate compliance standards including obligations to protect any information and applying appropriate measures for the use and transfer of personal data.

9. Is there an obligation to provide data?

In the context of a business relationship with the Bank a Client, a Connected Individual or a Third Party, must provide all personal data which is necessary for the establishment and maintenance of such business relationship and the performance of the associated contractual obligations or which the Bank is legally obliged to collect. As a rule, the Bank would not be able to enter into or perform any contract or – consequently – accept and execute any order without collecting and processing personal data.

Data subjects are responsible to make sure the information provided to the Bank is accurate and up to date.

In particular, provisions of anti-money laundering law require that the Bank verifies a data subject's identity before entering into the business relationship by means of a document of evidentiary value (e.g. identity card) and that the Bank collects and records a data subject's name, place of birth, date of birth, nationality, residential address and other data for that purpose. In order for the Bank to be able to comply with this statutory obligation, a data subject must provide the Bank with the necessary information and documents in accordance with the Anti-Money Laundering Act and notify the Bank without undue delay of any changes that may arise during the course of the business relationship. If a data subject does not provide the Bank with the necessary information and documents, the Bank will not be allowed to enter into or continue the requested business relationship.

If you give the Bank any information about another person connected to your account (such as a Connected Individual), you must inform such person about what personal data you have given to the Bank, and make sure they are informed of the content of this Data Privacy Statement.

10. Is "profiling" or "automated decision-making" used?

In some cases, the Bank processes personal data of Clients, Connected Individuals, prospective clients or Third Parties automatically with the aim of evaluating certain personal aspects (profiling). For instance, the Bank uses profiling in the following cases:

- Due to legal and regulatory requirements, the Bank is obliged to take anti-money laundering, anti-terrorist-financing, anti-fraud and anti-financial crime measures. Data evaluations (including on payment transactions) are also carried out in this context. At the same time, these measures also serve to protect you.
- In order to provide you with targeted information and advice on products, the Bank may use evaluation tools. These enable demand-oriented communication and advertising, including market and opinion research.

The Bank reserves its right to further analyse and evaluate personal data in an automated manner in the future, so as to identify significant personal characteristics of yourself or to predict developments and to create client profiles. These may in particular be used for business-related checks (e.g. compliance, KYC checks), individual management, advisory or financial services and the provision of offers and information that the Bank may make available to you.

When providing you with services, the Bank may make decisions about you by automated means. The Bank will ensure that a suitable contact person is available if you wish to express a view on any automated individual decision where such opportunity to express a view is required by law. In such event, please refer your request to the address contained in section 1 above.

11. Changes to the Data Privacy Statement

You may request another copy of this Data Privacy Statement from the Bank using the contact details set out in section 1 above. The Bank may modify or update this Data Privacy Statement from time to time by providing a revised version to its Clients or making such a revised version available on the Bank's website at www.bankzweiplus.ch/dataprotection.

Date: 1 September 2023