



Data Privacy Notice

The purpose of this Data Privacy Notice (hereinafter referred to as the "**Notice**") is to inform you (hereinafter referred to as the "**Subject**") about how we collect, store and process your personal data.

1. Entity Responsible for Processing and Principles

Fides Trustees SA, with seat in Geneva, Switzerland (hereinafter referred to as "**Fides**") recognizes the importance of keeping your data confidential and protecting your privacy rights. Therefore, all personal data and information (hereinafter referred to as "**Data**") provided in connection with our services will be processed lawfully, fairly, transparently and confidentially.

2. Consent

By contracting the services offered by Fides (hereinafter referred to as the "**Services**"), and in accordance with the relevant laws and regulations in force, you acknowledge that entering into an engagement with Fides or otherwise interacting with it means that you agree to the collection and processing of Data and agree to the terms of this Notice.

Fides Trustees SA is subject to Swiss data protection laws, such as the Swiss Federal Act on Data Protection of 25 September 2020 ("FADP"). As an internationally active company, the Regulation (EU) 2016/679 (General Data Protection Regulation or GDPR) is also relevant to us in addition to the Swiss data protection regulations.

3. Legal Basis and Purpose of Data Collection and Processing

3.1. Legal Basis

You acknowledge that the collection and processing of Data by Fides is necessary not only for the performance of the relevant Service, but also for the preservation of the legitimate interests of Fides and for the fulfilment of legal and regulatory obligations incumbent upon Fides.

3.2. Purposes

The Data is collected and processed by Fides for the following purposes (hereinafter referred to as the "**Purposes**"):

- The commencement of our business relationship (hereinafter referred to as a "**Business Relationship**") and the provision of the Services, including all documentation, information and formalities relating to your identification and the identification of any person or entity in respect of whom you or third parties provide information and / or of which Fides has



knowledge in any other way in connection with the Business Relationship (hereinafter referred to as a "**Related Person**").

- Any other related services provided by Fides' service providers and subcontractors in a Business Relationship.
- The management and administration of foundations, trusts, companies and other similar entities, including all services related to these activities.
- Compliance with legal and regulatory obligations to which Fides is subject in terms of the regulations applicable to Swiss financial intermediaries (Money Laundering and Enforcement Act, International Financial Regulations (e.g. FATCA, Automatic exchange of information).
- Protecting the interests of Fides or third parties: prevention of criminal activities or offences, risk management, exercise of rights and defense in litigation, IT security, safety of buildings and facilities.
- Fides' Client Management: Fides' client administration, invoicing for its services, marketing (newsletters, event invitations, etc.) and other related activities.

4. What Data is Collected?

4.1. Type of Data

As part of the Services, Fides collects, *inter alia*, the following Data from its interaction and dealings with, amongst others, Subjects, clients, banks, investment administrators, lawyers, accountants and other financial intermediaries and service providers:

- Identification data: personal identification data (e.g. name, surname, title, tax identification number) and data relating to any relevant investment or other entities, etc.
- Identification data issued by public authorities or available in public registers or filings, for example, identity cards, passports, certificate of incorporation, articles of association, share registers etc.
- Location data: personal and business addresses of any relevant investment or other entities.
- Communication and electronic identification data (personal and business): telephone number, e-mail address.
- Financial data: bank account numbers, financial resources, assets, financial transactions.



4.2. Information Collected Directly from Subjects

Fides collects and records all information provided in connection with the Services or received by any other means in its Client Relationship Management system. You may choose not to provide Fides certain Data, however this decision may prevent us from providing all or part of the Services.

4.3. Information Collected from Third Parties

As part of its Services, Fides may also collect data from third parties (for example, banks, investment administrators, lawyers, accountants, other financial intermediaries and service providers, international sanctions checklists and information otherwise available to the public (e.g. Bloomberg, World-Check, FACTIVA or LexisNexis)). Data collected from third parties is treated in the same way as Data collected directly from Subjects (see paragraph 4.2 above).

According to applicable regulations, Fides may be considered a processor of personal data in the context of information collected from third parties. Should this be the case, Fides may in certain circumstances enter into a data processing agreement with the relevant third parties to ensure compliance with the terms of this Notice.

5. Methods of Data Processing

Data is processed by Fides or by third parties selected on the basis of their reliability and competence, as well as by duly appointed data controllers, solely for the Purposes.

Fides retains the Data for as long as it is necessary in connection with the relevant Purpose and in accordance with the regulations applicable to the Services.

Fides deletes or anonymises Data (or takes equivalent measures) as soon as it is no longer required in connection with the relevant Purpose, subject however (i) to applicable legal, regulatory or internal compliance requirements relating to the retention of Data, or (ii) to ascertain, exercise and / or defend actual or potential rights in legal proceedings, investigations or other similar proceedings.

Security measures are in place to prevent, as far as possible, the loss of data, unlawful or improper use thereof and unauthorized access (see paragraph 8 “Privacy, Security and Data Protection” below).

6. Profiling

Fides may evaluate certain of your characteristics and characteristics of the Related Persons on the basis of automatically processed Data in order, in particular, to offer you personalized offers or information about its Services. Fides may also use technologies to identify the level of risk associated with a particular Subject or Business Relationship.



Fides does not use automated decision making in relation to a Business Relationship, a Subject, or a Related Person.

7. Access to Data and Data Transfers

The Data transmitted to Fides will be used by the officers and employees of Fides and/or its subsidiaries (local or foreign) for the sole purpose of performing the Services.

In connection with the performance of the Services, Fides may transmit the Data to third parties, including, without limitation, lawyers, accountants, banks and local or international authorities (in compliance with any applicable fiscal or other reporting obligations).

The transmission of data to third parties abroad is dependent on (i) an adequacy decision based on the list of countries where data protection legal standards have been approved by the European Commission or the Swiss Federal Data Protection and Information Commissioner (ii) appropriate safeguards being in place or (iii) a waiver for specific situations (including, without limitation, in connection with the performance of Services by Fides).

In addition, Fides may have to share your Data with third parties in the following circumstances:

- Where required by law or any regulation to do so (e.g. sharing your Data with a judicial authority, regulatory authority or law enforcement agency);
- To protect and defend Fides' rights or property;
- To our professional indemnity insurers;
- To other entities within the Fides Group (if appropriate and necessary in connection with the provision of the Services);
- To protect the personal safety, property or other rights of the public, Fides or its clients, officers or employees; or
- In connection with the sale, merger and/or outsourcing of all or part of Fides' operations.

Fides does not sell Data to any third party.

8. Privacy, Security and Data Protection

Fides will use all reasonable efforts to ensure that it maintains adequate levels of protection of Data.

Your Data will be transmitted to and stored on Fides' servers, access to which is strictly limited. Fides has taken the appropriate technical and organizational precautions to ensure that its servers are accessible exclusively to duly authorized persons, and additional measures to protect its technical environment (e. g. use of anti-viruses and firewalls).



9. Your Rights

In accordance with the applicable regulations and in connection with the processing of Data, you may exercise the following rights with respect to your Data:

- Right to request access to stored Data;
- Right to request the updating or correction of stored Data;
- Right to request the deletion of stored Data, subject to the applicable legal and regulatory provisions, and our internal compliance requirements relating to data retention;
- Right to request a limitation of the processing of stored Data, subject to the applicable legal and regulatory provisions regarding the processing of data;
- Right to receive the stored Data and have it transferred to another controller (data portability); and
- Right to request that we discontinue processing stored Data, subject to the applicable legal and regulatory provisions regarding the processing of data.

Please note that even if you object to the processing of Data or request that it be discontinued, Fides is, notwithstanding, entitled to continue processing Data if it is (i) legally obliged to do so, (ii) necessary for the performance of the relevant Services or contract relating thereto (whether or not you are a party), (iii) necessary for the performance of legal obligations in compliance with proceedings of public interest (iv) necessary for the legitimate interests that Fides pursues, including the pursuit, exercise or defense of a right in any legal proceedings or (v) required by any legal, judicial or regulatory authority.

10. Communication with Fides

If you have any questions about this Notice or Fides' protection of Data, please send an email to Fides Trustees, Switzerland at office@fidestrustees.com or write us at Fides Trustees SA, rue de la Croix-d'Or 19, 1204 Geneva, Switzerland. Fides will consider your questions and, if applicable, respond to you as soon as reasonably possible.

You may exercise any of your rights referred to in section 9 above by sending your request to the aforementioned email address.

If you are a resident of the European Union, you can send requests regarding the processing of your data to our representative based in the European Union at the following address: Fides Holdings SA, 231 Val des Bons Malades, L-2121 Luxembourg-Kirchberg.

If you are a resident of the UK, you can send requests regarding the processing of your data to our representative based in the UK at the following address: Fides Consultants Ltd, 8b Hollycroft Avenue, London, NW3 7QL, United Kingdom.



FIDES

T R U S T E E S S A

You also have the right to lodge a complaint with the Swiss Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>) or with your local supervisory authority at any time if you believe that your Personal data is processed in violation of applicable data protection legislation.

Please note that this Notice and our Terms of Service may change from time to time. Unless otherwise stated, this Notice applies to the use of all data and information collected about any Subject.