# **Privacy & Cookies Statement**

#### 1 General information

Alpinum Investment Management AG, Zürich, Switzerland ("Alpinum") appreciates your visit to this website ("Website") and your interest in our services. Alpinum takes data privacy seriously and adheres to high data protection standards as well as transparency of personal data collection and processing. In cooperation with our hosting providers, we make every effort to protect the databases against unauthorised access, loss, misuse or forgery. We would like to point out that data transfer over the Internet (e.g. communication by e-mail) can have security gaps. Complete protection of data against access by third parties is not possible. By using this Website, you agree to the collection, processing and use of data as described below.

This privacy & cookies statement stipulates how Alpinum processes personal data that it collects from users when operating the Website or other applications. For information to the processing of personal data that Alpinum obtains from its clients and other business partners as well as other individuals in the context of its business relationships with them please refer to the <u>Data Privacy Notice</u>.

The 'controller' of personal data processing as defined in the Swiss Federal Act on Data Protection (FADP) and to the extent applicable the EU General Data Protection Regulation 2016/679 (GDPR) is Alpinum Investment Management AG that can be contacted as follows:

- Mail: Alpinum Investment Management AG, Talstrasse 82, 8001 Zurich,
  Switzerland
- E-Mail: info@alpinumim.com

## 2 Scope of this privacy & cookies statement

Alpinum is committed to safeguarding the personal data that we collect from individuals who use this Website. Accordingly, Alpinum has developed this privacy & cookies statement to describe how and what type of data will be collected from users of the Website and the purposes for which Alpinum may collect, share or disclose the data.

This privacy & cookies statement applies to any information obtained by Alpinum through your use of this Website.

## 3 Processing of your personal data

When you visit Alpinum's Website, our web server automatically records details about your visit (e.g. your IP address). Besides, we process personal data which you provide through the Website, for example when you enter personal details (e.g. name, gender, address, e-mail address, phone/fax number) on a contact form. We process your data for the technical administration of this Website, to address your requests submitted via a contact form and for such purposes as otherwise specified in this privacy & cookies statement.

Alpinum has implemented reasonable technical and organisational security measures to protect your personal data collected by us via this Website against unauthorised access, misuse, loss or destruction. However, the internet is generally not regarded as a secure environment, and information sent via the internet may be accessed by unauthorised third parties, potentially leading to disclosures, changes in content or technical failures. Even if both sender and receiver are located in the same country, information sent via the internet may be transmitted across borders and be forwarded to a country which may have a lower data protection level compared to the one in your country of residence.

Please note that we accept no responsibility or liability for the security of your information transmitted via the internet to the Website. To protect your privacy, we would like to remind you that you may also choose another channel of communication with Alpinum, which you deem is appropriate.

Alpinum 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 and / or contractual requirements.

### 4 How we collect your personal data (cookies)

Our Website uses cookies. Cookies are files that are automatically created by your browser and stored on your mobile device, computer or any other device when you visit a Website. Primarily, two cookie groups can be distinguished: technical cookies which enhance the functionality of the Website and cookies applied for reasons of user-friendliness. If you do not want cookie files to be stored on your device, you can adjust the settings of the respective browser in your device. However, in such a case, the functionality of the Website might be affected. The functional cookies do not store any information to identify the users of the Website. For further details on blocking of cookies, please check <a href="https://www.allaboutcookies.org/manage-cookies/">https://www.allaboutcookies.org/manage-cookies/</a>.

Alpinum may store IP addresses for administrative purposes only, to resolve host and other server or technical problems connected to our system administrator. Such data is kept strictly confidential and following all applicable data protection law(s).

## 5 Disclosure and sharing of your personal data

Alpinum may share your data within companies of the Alpinum Group or any of its affiliates, with external service providers, authorities for the purposes stated above, or in case legal, regulatory or market practice requires such. Therefore, the data may be transferred to third parties in Switzerland or abroad for the processing, storing, retention, printing, evaluation or management of it. When transferring personal data internationally, we make sure that we comply with applicable laws and regulations. If a transfer of personal data is made to a third country that is not providing for an 'adequate level of data protection' or US-entities, which are not certified under the Data Privacy Framework (DPF) program, Alpinum ensures that such recipient of personal data will ensure that an 'adequate level of data protection' is provided. The latter will be safeguarded by concluding standard contractual clauses (SCC) that have been approved by the competent authority

with the recipient of personal data and (if required) by taking appropriate measures to ensure that the recipient complies with them.

## 6 Your Rights

In accordance with and as far as provided by applicable law, you have the right to access, rectification and erasure of your personal data, the right to restriction of processing or to object to our data processing, in particular for direct marketing purposes, for profiling carried out for direct marketing purposes and for other legitimate interests in processing in addition to right to receive certain personal data for transfer to another controller (data portability). In addition, every data subject has the right to enforce his/her rights in court or to lodge a complaint with the competent data protection authority. The competent data protection authority of Switzerland is the Federal Data Protection and Information Commissioner (http://www.edoeb.admin.ch).

### 7 Profiling and Automated Individual Decision-Making

We may partially process your personal data automatically with the aim of evaluating certain personal aspects (profiling). In particular, profiling allows us to inform and advise you about products possibly relevant for you more accurately. For this purpose, we may use evaluation tools that enable us to communicate with you and advertise you as required, including market and opinion research.

In establishing and carrying out a business relationship, we generally do not use any fully automated individual decisionmaking (such as pursuant to article 22 GDPR or article 21 FADP). Should we use such procedures in certain cases, we will inform you separately on this and advise you of your relevant rights if required by law.

### 8 SSL / TLS encryption

This Website uses SSL encryption for security reasons and to protect the transfer of confidential or personal data. With SSL encryption, no data transmitted through our Website is accessible by third parties. You can identify the encrypted connection by the "https://" indicated in your browser address bar and by the "lock" symbol

indicated next to it. If SSL or TLS encryption is activated, the data you transmit to us is not accessible by any third party.

#### 9 Contact form

If you send us enquires via the contact form, your data indicated in the contact form will be stored with us to process the enquiry and / or for follow-up questions. We will not pass on this data to a third party without your prior consent.

Data transmitted using the contact form on our Website will be stored to process your request, to provide the necessary information to you or to process follow up questions and for support handling. The processing of your personal data transmitted by the contact form takes place based on your explicit consent. The cancellation of your consent is possible at any time. Please send your cancellation request to: <a href="mailto:info@alpinumim.com">info@alpinumim.com</a>.

#### 10 Log files

Server log files are automatically collected and stored by the provider of the Website or by our servers. The following information is transmitted by your web browser automatically: type of Internet browser, version, OS and device details; visitor's IP address; the date and time of visit, referring address (location from which a visitor comes to the Websites). There will be no consolidation with other data sources.

## 11 Google Analytics

This Website uses Google Analytics, a web analysis service of Google Ireland Limited in Dublin ("Google Ireland"). Google Ireland relies on Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA as its sub-processor (both "Google") Google Analytics uses cookies to enable an analysis of Website usage by you to improve our offer and make it more interesting for you as a user. This Website also uses Google Analytics for a cross-device analysis of visitor flows by applying your user-ID. If you have a Google user account, you can deactivate the cross-device analysis of your usage in the settings there under "My data", "personal data".

The IP address used by your browser within the scope of Google Analytics will not be associated with any other data held by Google. If the data collected about you contains a personal reference, it will be immediately deleted. Only in exceptional cases is the full IP address transferred to a Google server in the USA and shortened there in case for further use.

The information generated by the cookie about your use of this Website is controlled and processed by Google. Google will use this information to evaluate your use of the Website, compiling reports on Website activity and providing other services relating to Website activity and internet usage.

The information generated by the cookie is usually transferred to a Google server in the USA and stored there. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of this Website. You can also prevent the collection of data generated by the cookie and related to your use of the Website (including your IP address) to Google and the processing of this data by Google by downloading and installing the browser plugin available at the following link: <a href="https://tools.google.com/dlpage/gaoptout/?hl=en">https://tools.google.com/dlpage/gaoptout/?hl=en</a>. Herewith a so-called optout cookie will be stored on your data carrier, which will prevent the processing of personal data by Google Analytics. Please note that if you delete all cookies on your device, you also remove the opt-out cookies, which means that you will have to reset the opt-out cookies' plugin. The opt-out cookies' plugin is set per browser and device. Therefore, it must get activated separately for each browser on each device.

#### 12 Newsletter

If you would like to receive the newsletter offered on the Website, we need an e-mail address from you as well as information that allows us to verify that you are the owner of the e-mail address provided and that you agree to receive the newsletter. Further data will not be collected. We use these data exclusively for sending the requested information and do not pass them on to third parties.

You can revoke your consent to the storage of the data, the e-mail address and its use for sending the newsletter at any time, for example by clicking on the "unsubscribe link" in the newsletter.

### 13 Mailchimp

The newsletters are sent via the mailing service provider 'MailChimp', a newsletter mailing platform of the US provider Rocket Science Group, LLC, 675 Ponce De Leon Ave NE #5000, Atlanta, GA 30308, USA. The privacy policy of the mail service provider can be viewed <a href="here">here</a> [https://mailchimp.com/legal/privacy/]. The mail order service provider is used on the basis of our legitimate interests and an order processing contract.

The mail-order service provider may use the recipient's data in pseudonymous form, i.e. without assigning it to a user, to optimise or improve its own services, e.g. for technical optimisation of the dispatch and presentation of newsletters or for statistical purposes. However, the dispatch service provider does not use the data of our newsletter recipients to write to them itself or to pass the data on to third parties.

#### 14 LinkedIn

This Website uses features of the LinkedIn network. The provider is LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA. Each time you access one of our pages that contains LinkedIn features, a connection to LinkedIn's servers is established. LinkedIn will be notified that you have visited our sites using your IP address. If you click on LinkedIn's "Recommend Button" and are logged into your LinkedIn account, LinkedIn will be able to associate your visit to our Website to your user account. We would like to point out that Alpinum is not aware of the content of the transmitted data or its use by LinkedIn.

For more information, please refer to the LinkedIn privacy policy at <a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a>. If you don't want LinkedIn to collect information about you with the help of our Website and link it to your stored membership data, you must log out of LinkedIn before you access our Website.

#### 15 Google maps

This Website uses the offer of Google Maps, which allows us to display interactive maps directly on the Website and enables you to use the map function conveniently.

By visiting the Website, Google receives the information that you have called up the corresponding subpage of our Website. It happens regardless of whether Google provides a user account through which you are logged in or whether no user account exists. If you are logged in at Google, your data will be assigned directly to your account. If you do not wish to be assigned to your profile on Google, you must log out before activating the button. Google stores your data as user profiles and uses them for advertising purposes, market research and demand-oriented design of its Website. Such an evaluation is performed in particular (even for users who are not logged in) to provide need-based advertising and to inform other users of the social network about your activities on our Website. You have a right of objection to the creation of these user profiles, whereby you must contact Google to exercise this right. Further information on the purpose and scope of data collection and its processing by Google, including information on your rights in this regard and setting options for protecting your privacy, can be found at <a href="http://www.google.de/intl/de/policies/privacy">http://www.google.de/intl/de/policies/privacy</a>.

#### 16 Google reCAPTCHA

This Website uses the service reCAPTCHA of Google LLC (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; "Google"). The purpose of the query is to differentiate whether the input is made by a human being or by automated, machine processing. The query includes the sending of the IP address and any other data required by Google for the service reCAPTCHA to Google. For this purpose, your input will be transmitted to Google and used there. Your IP address will, however, be reduced by Google within member states of the European Union or in other signatory states of the Agreement on the European Economic Area before it is further used. Only in exceptional cases will the full IP address be transferred to a Google server in the USA and shortened there. Google will not combine the IP address transmitted by your browser in the context of reCAPTCHA with other available data. By clicking on the query, you consent to the processing of your data. You may revoke your consent at any time without affecting the lawfulness of the processing carried out before revocation. Further information on Google reCAPTCHA and the corresponding data protection declaration is available at https://policies.google.com/privacy.

# **ALPINUM INVESTMENT MANAGEMENT**

This privacy & cookies statement may be updated from time to time. Therefore, we kindly ask you to consult it regularly.

Zurich, 15. September 2024

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