

Data privacy notice

Alpinum Investment Management AG takes data privacy seriously and adheres to high data protection standards as well as transparency of personal data collection and processing for our contracting parties. We comply with applicable data protection regulations in particular the Swiss Federal Act on Data Protection (FADP) and to the extent applicable the EU General Data Protection Regulation 2016/679 (GDPR) (hereinafter altogether referred to as Data Protection Legislation). The terms “personal data”, “data subject”, “controller”, “processor” and “process” shall have the meanings given to them in the Data Protection Legislation.

Herewith below, we stipulate the key aspects of personal data processing and our obligations towards individuals (e.g. contracting parties, its related persons such as authorized persons, partners, advisors, beneficial owner(s) / beneficiary(-ies), etc.: hereinafter altogether referred to as data subject), whose personal data Alpinum Investment Management AG may control and process, and their rights. The ‘controller’ of personal data processing as defined in the Data Protection Legislation is Alpinum Investment Management AG that can be contacted as described in Section 7.

1 Processing of personal data

Within the framework of the provision of the services rendered by Alpinum Investment Management AG, we may be required to obtain from the contracting party personal data of a data subject. Depending on the service provided by Alpinum Investment Management AG the following personal data may be collected and / or processed:

- personal details such as name, identification number, date of birth, KYC documents (including copies of identification documents (identity cards and / or passport), phone number any kind of address details, family related information (e.g. name of the spouse, children, partner or relatives));

- financial information, including payment and transaction records and information relating to bankable and non-bankable assets, financial statements, liabilities, taxes, revenues, earnings and investments (including investment objectives);
- tax domicile and other tax-related documents and information;
- professional information, such as job title and work experience;
- information related to knowledge of and experience in investment matters;
- identifiers such as assigned client and / or account numbers;

by accessing www.alpinumim.com, data transmitted by a browser will be automatically recorded by our server, including the date and time of the access, name of the accessed file, data volume, performance of the access, browser language, requesting domain, IP address, etc. Please consult www.alpinumim.com for additional information related to cookies;

and any other information required to be obtained under the applicable laws (hereinafter altogether referred to as personal data).

In some cases, we collect personal data from public sources (e.g. official company register, press, and the internet) or third parties, such as due diligence service providers (e.g. name checking data base) or from another Marcuard Heritage Group entity (i.e. Alpinum Investment Management AG's sister companies and/or any of its subsidiaries and/or affiliates).

Alpinum Investment Management AG 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.

2 Legal basis for and purpose of processing of personal data

Alpinum Investment Management AG always processes personal data for a specific purpose. In particular for:

- a) The conclusion and fulfilment of contractual obligations

Personal data is processed to offer and provide financial intermediary services such as asset management, investment advisory, investment reporting, etc. or pre-contractual clarifications (hereinafter altogether "services").

b) Further purposes within our legitimate interests

Where required, personal data is processed for legitimate interests pursued by Alpinum Investment Management AG or a third party, due to statutory provisions or in the public interest. In particular for:

- providing and developing our products, services and websites, apps and other platforms, on which we are active;
- communication with third parties and processing of their requests (e.g., job applications, media inquiries);
- 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, regulators, other authorities and administrative bodies;
- valuation and enhancement of IT security and IT operation;
- risk control and security reasons of contracting parties, employees, and shareholders of Alpinum Investment Management AG;
- advertisement and marketing (including organizing events), provided that you have not objected to the use of your personal data for this purpose (if you are part of our customer base and you receive our advertisement, you may object at any time and we will place you on a blacklist against further advertising mailings);
- asserting legal claims and defence in legal disputes and official proceedings;
- prevention and investigation of criminal offences and other misconduct (e.g. conducting internal investigations, data analysis to combat fraud); and
- acquisition and sale of business divisions, companies or parts of companies and other corporate transactions and the transfer of personal data related thereto as well as measures for business

management and compliance with legal and regulatory obligations as well as internal regulations of Alpinum Investment Management AG.

If you have given us your consent to process your personal data for certain purposes (for example when registering to receive newsletters or carrying out a background check), we will process your personal data within the scope of and based on this consent, unless we have another legal basis, provided that we require one. Consent given can be withdrawn at any time, but this does not affect data processed prior to withdrawal.

3 Personal data transfer and sharing

Alpinum Investment Management AG shares personal data within the Marcuard Heritage Group, with external service providers or authorities in the course of a business relationship, or in case legal, regulatory or market practice requires such. This may affect the transfer of personal data to third parties in Switzerland or abroad for the processing, storing, retention, printing, evaluation, management, etc. of personal data. Thereto, Alpinum Investment Management AG in particular may share personal data with:

a) The Marcuard Heritage Group

To fulfil our contractual, statutory or legal obligations, in connection with the services rendered, Alpinum Investment Management AG may share personal data within the Marcuard Heritage Group (e.g. Switzerland, Singapore, Cyprus) as well as with Collective Investment Vehicles domiciled in Luxemburg, the Principality of Liechtenstein and Switzerland. Thereto, appropriate organizational (e.g. outsourcing agreements) and technical safeguards to protect personal data are ensured.

b) Third parties

When providing services, Alpinum Investment Management AG may share personal data with third parties acting on behalf of the contracting party: e.g. payment recipients, beneficiaries, account nominees, intermediaries, banks, correspondent and agent banks, stock exchanges and other financial institutions.

c) Authorities / administrative bodies

Alpinum Investment Management AG may disclose personal data to authorities, regulators or administrative bodies, when required to do so by law or regulation, or based on a court / administrative order.

d) External service providers

Alpinum Investment Management AG may transfer personal data to service providers and agents appointed by us for a specific purpose: e.g. to provide banking, IT, accounting, logistic and / or telecommunication services.

Such service providers may be located also outside of Switzerland and in particular in countries that are, according to the Data Protection Legislation, not providing for an 'adequate level of data protection' like the USA. When transferring personal data within Switzerland or abroad Alpinum Investment Management AG ensures that service providers will adhere to the applicable laws and regulations to the extent possible and 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 (service provider) and (if required) by taking appropriate measures to ensure that the recipient complies with them.

An exception may apply for example in case of 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.

4 How long will personal data be stored?

Alpinum Investment Management 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, Alpinum Investment Management 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.

5 Rights of the data subject

The data subject has the right to get access and obtain information about the purpose for which personal data is processed, stored and to obtain information about recipients with whom Alpinum Investment Management AG shares / has shared personal data.

The data subject has the right to ask Alpinum Investment Management AG to rectify inaccurate personal data collected and to request restriction of personal data processing, while such a request is pending.

The data subject has the right to ask Alpinum Investment Management AG to stop processing his / her personal data, or to request erasure of its personal data. These rights, however, are not determined, as there might be overruling interests (e.g. ongoing legal proceeding or safeguarding the ability to comply with legal requirements) that require the processing of personal data to be continued.

The data subject may have the right under the applicable data protection law to request from Alpinum Investment Management AG that all his / her personal data which was processed will be transferred to the data subject or to a specified other data controller of his / her choice.

6 Profiling and Automated Individual Decision-Making

Alpinum Investment Management AG 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 or services 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, Alpinum Investment Management AG generally does not use any fully automated individual decision-making (such as pursuant to article 21 FADP or article 22 GDPR). 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 applicable law.

7 Exercising rights and complaints

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

info@alpinumim.com

or via mail at:

Alpinum Investment Management AG

Talstrasse 82
8001 Zurich
Switzerland

In case Alpinum Investment Management AG'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.

8 Security note

Alpinum Investment Management AG ensures an appropriate level of security while processing personal data. Thereto, we have appropriate technical and organisational measures in place to prevent unauthorised or unlawful access to personal data provided to us. However, complete data security cannot be guaranteed, in particular for communication via e-mail, instant messaging, and similar means of communication. Therefore, we recommend sending any confidential information by alternative secure means.

9 Further information

Alpinum Investment Management AG processes personal data both in its role as a data controller and a data processor, lawfully, fairly and in particular considering the legitimate purpose for which it is collected.

Alpinum Investment Management AG is committed to keep personal data accurate and up to date. Therefore, in case personal data changes, please keep us informed of any changes occurred as soon as possible.

10 Status of this privacy notice

This privacy notice has been updated in June 2023. It is a notice explaining what Alpinum Investment Management AG does, rather than a document that binds Alpinum Investment Management AG or any other party contractually. We reserve the right to amend it from time to time. If the notice has been updated, we will take steps to inform you of the update by appropriate means, depending on how we normally communicate with you, such as through your account statement.