

Processing of Personal Data

In order to comply with the legal provisions applicable, in particular as a part of the client segmentation process and its compliance with anti-money laundering laws, the Company collects and processes information from and on its clients and prospective clients about their personal and financial circumstances.

The Company not only processes personal data obtained from its clients, but also processes personal data collected through publicly available sources and private sector data providers focusing on data relevant in the field of financial services. In this context, the Company may also process particularly sensitive personal data on its clients, individuals representing them, on controlling persons and beneficial owners of assets under management as well as personal data on family members and other individuals having personal and commercial ties with our clients. If the client refuses to disclose information requested by the Company, we may not be able to provide specific services, may not be allowed to enter into a business relationship or must terminate the relationship.

The Company must not and will not delete this information upon or shortly after termination of a business relation but will keep this data stored as required by applicable legislation.

The Company may and will share personal data with third parties in the framework of the outsourcing of business activities to the extent required, as well as with other financial services providers, which also render services to the client in question. [Such outsourcing and business partners may be located in other countries where we deem the degree of data protection being of an adequate level.]

The Company, its directors and employees as well as all of its outsourcing partners and agents are subject to professional secrecy obligations pursuant to the Financial Institutions Act.

The Company maintains adequate internal guidelines and compliance programs for the processing of personal data.