

Information on data protection

The protection of your personal data and your privacy is important to us. Please find enclosed information in connection with the processing of personal data held at Comnia Group AG and the resulting rights under the provisions of the Swiss Data Protection Act (DPA) and the European general data protection regulation (GDPR). What data is processed specifically and the way in which it is used depends essentially on the services to be provided or that have been agreed. The obligation of trust secrecy commits Comnia Group AG to protecting the client's privacy and maintaining confidentiality and it thus implements a large number of technical and organisational data protection policies for all the personal data that it processes. The nature of our business relationship requires us to process personal data which is needed in order to open and implement the business relationship and to comply with the related statutory or contractual obligations as well as to provide services or execute orders. Without this data, we will generally not be able to enter into or maintain a business relationship, process an order or offer services.

Should you have questions please contact the
Data Protection Commissioner of Comnia Group AG
Oberneuhofstrasse 5, 6340 Baar
Email: datenschutz@comnia.ch
Telefon: +41 41 729 3030

What data is processed and from what sources does it originate?

We gather and process personal data that we obtain as part of our business relationship with our clients. Personal data may be processed at every stage of a business relationship and differ according to the group of people concerned. Different types of data are stored depending on the client category.

As a basic principle, we process personal data provided to us by you through various communication channels and through contracts and other documents. Insofar as is necessary for the provision of a service, we also process personal data that is generated or transmitted as a result of the use of services or that we have duly obtained from third parties, from public agencies (e.g. sanction lists) or from other companies Comnia Group AG Group companies, delegates and intermediaries. Finally, personal data from publicly available sources (e.g. press, Internet, register of companies or associations) may be processed.

In addition to client data, we also process, if applicable, personal data of other third parties involved in the business relationship, such as data on authorised agents, representatives, co-debtors, beneficiaries, employees, legal successors or beneficial owners of a business relationship. We would ask you kindly to pass this data protection information on to them as well.

We use the term „personal data“ to refer to the following categories of data in particular:

- Personal details (e.g. name, date of birth, nationality, religious confession)
- Address and contact details (e.g. address, telephone number, e-mail address)
- Identification data (e.g. passport or identity card data)
- Information on services used as well as order and risk management data (e.g. information on compliance with due diligence obligations and the prevention of money laundering, information on investment experience and knowledge)

- Other data and information on the business relationship (e.g. information on contract term, your spouse or partner and other family details, details of authorised agents or legal representatives, tax number)
- Information on the professional and personal background (e.g. education, occupation)
- Data from publicly accessible sources (e.g. registers of companies or beneficial owners)
- Information on the financial situation (e.g. origin of assets as well as requirements, incomes, expenses, assets and liabilities, source of wealth as well as your bank details)

For what purposes and on what legal basis is your data processed?

We process personal data in compliance with the provisions of the GDPR and the Swiss Data Protection Act (DSG) for the following purposes:

- For the performance of a contract or in order to take steps prior to entering into a contract within the context of providing and brokering fiduciary transactions and tax advisory services as well as for accounting services and audits. The purposes for data processing are primarily determined by the specific service.
- For compliance with a legal obligation or in the public interest, in particular to adhere to statutory and supervisory requirements (e.g. GDPR, the DSG, due diligence, money laundering, tax laws and agreements, control and reporting obligations, risk management, social insurance agencies).
- For the purposes of the legitimate interests pursued by us or by a third party for specifically defined purposes, in particular for determining credit ratings, for enforcing claims, for marketing purposes, managing risks, for preventing and investigating criminal offences, to avert danger).
- On the basis of the consent for data processing that you gave us in orders you have issued, such as forwarding data to Group companies, service providers or contractual partners. You have the right to withdraw your consent at any time. The withdrawal of consent shall only be effective for the future and shall not affect the lawfulness of data processed before the withdrawal of consent.

We reserve the right to further process personal data that has been collected for one of the above purposes for the other purposes too if this is consistent with the original purpose or permitted or provided for by law (e.g. reporting obligations).

Who obtains access to personal data and how long is it stored for?

Bodies both within and outside of the fiduciary company may obtain access to your data. Within the fiduciary company, only bodies or employees may process your data if they require it in order to comply with our contractual, statutory and supervisory obligations and to safeguard legitimate interests. Other Group companies, service providers and vicarious agents may also obtain personal data for these purposes provided that they comply with fiduciary and data secrecy obligations. Processors may be companies in the following categories: Fiduciary companies, banks, delegation recipients, IT-service providers, printing services, collection, advisory and consulting.

Where there is a statutory or supervisory obligation, public agencies and institutions (e.g. supervisory and tax authorities) may also receive your personal data.

Data is only transferred to countries outside the EU or EEA (so-called third countries) provided this is necessary for the implementation of pre-contractual measures or the performance of a contract, the provision of services or processing of orders (e.g. IT-services), you have issued

us with an order or given us your consent, it is necessary for important reasons of public interest (e.g. to prevent money laundering) or is required by law (e.g. reporting obligations under tax law).

We process and store the personal data throughout the duration of the business relationship provided certain data is not subject to shorter mandatory deletion periods and 10 years afterward. It should be noted that our business relationship can last for years. In addition, the storage period is determined according to the necessity and purpose of the respective data processing. If the data is no longer required for compliance with contractual or statutory obligations or to safeguard our legitimate interests (purpose achieved) or if consent that has been granted is withdrawn, it will be deleted on a regular basis unless it needs to be further processed in line with the contractual or statutory retention periods and documentation obligations or in order to preserve evidence for the duration of the applicable statute of limitations.

What data protection rights do you have

You have the following data protection rights with regard to the personal data concerning you:

- Right of access: You may obtain information from the fiduciary company as to whether and to what extent personal data concerning you is being processed (e.g. purpose of processing, etc.).
- Right to rectification, erasure and restriction of processing: You have the right to obtain rectification of inaccurate or incomplete personal data concerning you. In addition, your personal data must be erased if this data is no longer required for the purposes for which it was collected or processed, you have withdrawn your consent or this data is being unlawfully processed. Furthermore, you have the right to obtain restriction of processing.
- Right of withdrawal: You have the right to withdraw your consent for the processing of personal data concerning you for one or more specific purposes at any time if processing is based on your explicit consent. Please note that the withdrawal of consent is only effective for the future. Processing that was carried out before the withdrawal is not affected. Neither does the withdrawal have any effect on data processing founded on another legal basis.
- Right to data portability: You have the right to receive personal data concerning you that you have provided to the controller in a structured, commonly used and machine-readable format and to have this data transmitted to another controller.
- Right to lodge a complaint: You have the right to lodge a complaint with the competent supervisory authority in Switzerland. You may also contact another supervisory authority of an EU or EEA member state, for example in your habitual residence, place of work or the place of the suspected breach.

The contact details for the competent data protection office in Switzerland are:

Federal Data Protection and Information Commissioner
Feldeggweg 1
CH - 3003 Bern

Telephone: +41 58 462 43 95 (Mon - Fri, 1000 - 1200 o'clock)
Facsimile: +41 58 465 99 96
<https://www.edoeb.admin.ch>