

Auris Wealth Management S.A.

Personal data protection declaration

This personal data protection declaration (hereinafter, the "Declaration") informs all persons concerned by the collection, storage and processing of data (hereinafter, the "Data subjects") on how we collect, store and process this data.

1 Data controller and principles

The data controller, Auris Wealth Management SA in Geneva, Switzerland (hereinafter, "AWM"), recognizes the importance of keeping the personal data of its clients confidential and of protecting their right to privacy. Given its activities and with regard to the data collected by AWM, the latter intends to apply the most restrictive identifiable principles and standards in terms of the protection of personal data. Consequently, all personal data and information (hereinafter, the "Data") used in the context of our services will be treated in a lawful, fair, transparent and confidential manner by AWM.

2 Consent

The Data Subject, by contracting one or more services offered by AWM (hereinafter, the "Services"), and in accordance with the legal provisions in force, agrees that, in the context of the Services, Data is or will be collected by AWM. This Data will be collected and used solely for the purposes of the Services offered by AWM or any subsequent contractual relationship with AWM. Therefore, entering into a mandate (asset management, investment advice, or other) with AWM means that the Data Subject accepts the collection, processing of Data and adheres to this Statement. Likewise, the entry into negotiations already constitutes an agreement of the Data subject to the collection and an adhesion to this declaration, insofar as AWM is already legally obliged to collect information on its potential customers, this even if no relation of business does not materialize thereafter.

3 Legal basis and purposes of the collection and processing of Data

3.1 Legal basis

The Data Subject acknowledges that the collection and processing of Data by AWM is necessary for the performance of the mandate entrusted to AWM to which the Data Subject is a party in connection with the Services, but also for the preservation of the legitimate interests of AWM and for the compliance with legal obligations incumbent on AWM. AWM is bound by a legal obligation to collect and process the data of any customer or potential customer entering into negotiations with it.

3.2 purposes

The Data is collected by AWM for the following purposes:

- The opening and maintenance of the contractual relationship with the Person concerned or the beginning of a commercial relationship with AWM (hereinafter referred to as "Business relationship"), including all the formalities relating to the identification of the Person concerned and all persons or entities about which the Person concerned or a third party provides information and / or of which AWM is aware in any other way in relation to the Business Relationship (hereinafter referred to as "Related Person").
- Any other ancillary service provided by AWM's service providers and subcontractors in a business relationship.
- The management, administration, placement and distribution of financial products, including all

services related to these activities.

- Compliance with legal and regulatory obligations to which AWM is subject by virtue of the regulations applicable to Swiss financial intermediaries (in particular: law on money laundering and application of related regulations, international financial regulations (for example FATCA, automatic exchange of tax information, etc.).
- The weighing of interests, the protection of the interests of AWM or third parties: prevention and elucidation of criminal offenses, risk management, exercise of rights and defense in disputes, consultation and exchange of information with information offices, security IT, building and facility security.
- Management of AWM customers: in particular, billing, marketing (newsletters, invitations to events, etc.) and others.

4 What Data is collected?

4.1 Types of Data

AWM collects the following data (illustrative, non-exhaustive list) from its counterparties (current or potential clients, business introducers, trustees, administrators of private investment vehicles, lawyers, banks, other financial intermediaries and counterparties):

- Identification data: personal identification data (surname, first name, title, tax number) and structural identification data (information relating to investment entities), commercial and professional activities, personal links or professionals with third parties, exposure in the media or national or international, public or private databases, etc.
- Identification data issued by public services and other registers: identity cards, passports, certificate of incorporation, articles of association, share registers.
- Location data: personal and professional addresses relating to investment entities.
- Communication and electronic identification data (personal and professional): phone number, email addresses, WhatsApp, etc ...
- Financial data: identification number and bank accounts, financial means / assets, income, investments, financial transactions.
- Investment profile data.

4.2 Information collected directly from Data subjects

AWM collects and records all information communicated to it as part of the Services or by any other means in its customer relationship management systems (CRM, PMS). The Data Subject may decide not to communicate certain information, however this decision may have the effect of depriving them of certain Services or of the functionalities offered within the framework of the Services. In some cases, this refusal may also make it impossible for AWM to enter into or maintain a Business Relationship. In certain cases, the refusal to provide certain data imposed by the applicable law or regulation may lead to (i) a search for information by other means, in particular if the law requires it and / or (ii) the communication of the Business relationship with the criminal authorities or the fight against money laundering.

4.3 Information collected from third parties - subcontractor

As part of its Services, AWM may also be required to collect data from third parties (business providers, trustees, administrators of private investment vehicles, lawyers, banks, other financial intermediaries, list of international sanctions, available information to the public (for example, Bloomberg, World-Check, Factiva or LexisNexis). Data collected from third parties is processed in the same way as Data collected directly from Data Subjects (see paragraph 4.2 above). By using AWM's Services or accepting the possibility of using them (potential customer), the Data Subject adheres to

this Statement and accepts the collection of data concerning him / her from third parties. In the context of information collected from third parties, AWM may be considered as a processor of personal data, according to the applicable regulations. If this were to be the case, AWM would be required to conclude a subcontracting contract with the third parties concerned aimed at ensuring compliance with this Declaration.

5 Data processing methods

The Data is processed by AWM - or by third parties selected on the basis of their reliability and skills, as well as by duly appointed data controllers only for the purpose of carrying out the aims specified in paragraph 3.2 above, mainly through IT tools, but also on paper. AWM retains the Data for the time necessary to fulfill the purposes for which it was collected and in accordance with the regulations applicable in the context of the Services (for example, ten years in the context of banking services (Law on Banks or Code of Obligations)). Likewise, AWM deletes or anonymizes personal data (or takes equivalent measures) as soon as they are no longer necessary to achieve the Purposes, subject (i) to the legal or regulatory requirements applicable to the retention of data over a period of time, longer, or (ii) determine, exercise and / or defend actual or potential rights in legal proceedings, investigations or similar proceedings, including legal statements that AWM may impose to preserve the relevant information. Specific measures are applied to prevent the risk of data loss, illicit or incorrect use and unauthorized access (see paragraph 7 (Confidentiality, security and data protection) below).

6 Knowledge and Transmission of Data

The Data that is transmitted to AWM is known and used by AWM employees with the sole purpose of performing the Services which constitute the reason for which the Data was collected. As part of the performance of the Services, AWM may be required to transmit the Data to third parties, in particular (i) to custodian banks, to financial service providers / administrator back office or, (iii) to national and international tax authorities, in accordance in particular with tax reporting obligations. The transmissions of data to third parties are based, alternatively, (i) on an adequacy decision, (ii) by virtue of appropriate guarantees or (iii) according to an exemption for specific situations (execution of a mandate related to the Services offered by AWM in particular). It is already specified that:

- In relations with custodian banks, data transfers may take place to national and international banks, as well as with any other financial intermediary.
- In the management of its administrative and technological obligations, Data transfers may take place with an IT service provider.
- As part of the implementation of FATCA regulations, Data transfers may take place with the Internal Revenue Service (IRS) or any other competent tax authority recognized by the IRS.
- As part of the implementation of the Automatic Exchange of Information (AEOI), data transfers may take place with any competent tax authority, being clarified that the condition of data confidentiality is a sine qua non obligation stipulated by the OECD in order to join the Automatic Exchange of Information mechanism.
- As part of the implementation of any other regulations and the Services, AWM carries out an assessment of the recipients of the Data in accordance with the applicable standards, AWM does not sell or rent the Data to any third party,

finally, AWM may need to share Personal Data:

- To provide you with the Service you need;
- When permitted or required by law to remain compliant with a valid legal process;
- To protect and defend, from time to time, the rights or property of AWM, including the safety of its products and services;

- To protect the personal security, property or other rights of the public, of AWM or of its customers or employees, in particular by means of badge or video surveillance systems; Where
- In connection with a sale of all or part of AWM's business.

7 Confidentiality, security and data protection

AWM is committed to ensuring the existence of adequate levels of protection in accordance with applicable legal and regulatory requirements, in particular those relating to professional secrecy and data protection.

8 Rights of Data Subjects

In accordance with applicable regulations, in the context of Data processing, Data Subjects may exercise the following rights concerning their data:

- Right to request access to stored Data;
- Right to request the rectification of the Retained Data;
- Subject to the legal provisions applicable to data retention (banking law, FACTA law, etc.), the right to request the erasure of the retained Data;
- Subject to the legal provisions applicable to data processing (banking law, FACTA law, EAR, etc.), the right to request a limitation of the processing of the retained Data; and
- Subject to the legal provisions applicable to data processing (banking law, FACTA law, EAR, etc.), the right to request a ban on the processing of retained Data. Even if a Data Subject disputes the processing of their data, AWM is entitled to continue this processing if it is (i) legally binding, (ii) necessary for the performance of the contract to which the object is a party, (iii) necessary for the performance of a mission of public interest or (iv) necessary for the legitimate interests that AWM pursues, including the discovery, exercise or defense of legal claims. In general, the Data Subject has the right to demand from AWM the protection of his Data. AWM works tirelessly to protect itself and its users from unauthorized access, alteration, disclosure or destruction of information that is held. More particularly:
 - AWM respects this Statement in all circumstances with respect to all Data that AWM collects about the Data Subject;
 - AWM limits the use and disclosure of your Data and ensures that anyone with whom AWM shares this information treats it with the confidentiality and security they deserve. ; and
 - AWM has implemented material, technical and administrative procedures to protect the information collected. The exercise of any right set out in the paragraph must be done in accordance with the provisions of paragraph 9 (Notices) below.

9 Notices

If you have any questions regarding data protection by AWM, you can send us a detailed message at (info@auriswm.ch) and we will try to resolve them as soon as possible. You can exercise any of your rights related to personal data (paragraph 8) by sending your request to the aforementioned address. AWM's business is constantly evolving and this Statement and the General Terms and Conditions of Service may change. Unless stated otherwise, our Statement applies to the use of all information we have collected about you.