

INFORMATION ON PERSONAL DATA PROCESSING

This document contains information relating to the processing activities carried out by Colombo Wealth SA (hereinafter "COLOMBO") in relation to the personal data of clients with whom it has a contractual relationship (hereinafter "Client") and is provided pursuant to art. 19 of the Federal Act on Data Protection (hereinafter "FADP") and art. 13 of the Data Protection Ordinance (hereinafter "DSV").

1. Definitions

- **personal data:** any information relating to an identified or identifiable natural person;
- **sensitive personal data:** data relating to religious, philosophical, political or trade union-related views or activities, data relating to health, the private sphere or affiliation to a race or ethnicity, genetic data, biometric data that uniquely identifies a natural person, data relating to administrative and criminal proceedings or sanctions, data relating to social assistance measures;
- **data subject:** a natural person whose personal data is processed;
- **processing:** any handling of personal data, irrespective of the means and procedures used, in particular the collection, storage, keeping, use, modification, disclosure, archiving, deletion or destruction of data;
- **disclosure:** transmitting personal data or making such data accessible;
- **profiling:** any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements;
- **controller:** a private person who or federal body which, alone or jointly with others, determines the purpose and the means of processing personal data;
- **processor:** an authority or service of the Confederation or a person entrusted to carry out public tasks on behalf of the Confederation;
- **federal body:** an authority or service of the Confederation or a person entrusted to carry out public tasks on behalf of the Confederation.

2. Controller

The controller of personal data is: **Colombo Wealth SA, Via Clemente Maraini 39, 6900 Lugano (Switzerland)**. The list of the people authorized to process personal data and the processors is kept at the COLOMBO headquarters and made available upon request of the Client.

3. Scope of application

The Client's personal data are collected by COLOMBO for the purpose of finalizing and managing the contractual relationship and will be processed in full compliance with the principles of lawfulness, good faith, and proportionality.

4. Processed personal data

To the extent permitted by the regulations in force, COLOMBO may process the following personal data (non-exhaustive list):

1. Client's personal and identification data such as, for example, personal information such as name, gender, marital status, tax code, nationality, date of birth, documents relating to compliance (including copy of national identity card or

passport), telephone number, postal address and e-mail, as well as data on family members such as the name of the spouse, partner or children;

2. Information relating to the professional profile (such as curriculum vitae, work experience, companies owned or managed and professional contacts) and information relating to the composition of the personal wealth;
3. Financial information, including payment and transaction records and information relating to property (including real estate and businesses), balance sheets, liabilities, taxes, income, earnings, investments (including investment objectives), including the ones associated with the account of the Client;
4. Tax domicile and other tax documents and information;
5. Knowledge and experience in the investments field;
6. Details of interactions with COLOMBO, including communications via email;
7. Identifying information that COLOMBO assigns such as customer, contract, relationship, or account number, etc.;
8. In some cases (where permitted by law), sensitive personal data, concerning for example administrative and criminal proceedings and sanctions;
9. Administrative data and data necessary for the execution of any transactions;
10. Information of other parties involved in the relationship such as directors, legal representatives, employees, business partners, beneficiaries, policy holders, dependents or family members, attorneys, or persons with viewing rights, etc.

5. Personal data required for the initiation and maintenance of the contractual relationship

The provision of personal data by the Client represents a necessary requirement for the finalization and execution of the contractual relationship and, therefore, any refusal by the Client to provide them in whole or in part may lead to the inability of COLOMBO to provide the requested services.

In particular, pursuant to the rules relating to combating money laundering and terrorist financing, COLOMBO must fulfill a series of due diligence obligations, including that of identifying the Client and the beneficial owners, as well as clarifying, where necessary, the economic background of the transactions carried out by the Client. In order to allow COLOMBO to fulfill these obligations, the Client is required to provide COLOMBO with the requested personal data and information.

6. Purpose of processing

COLOMBO processes the Client's personal data for the following purposes:

1. finalization and execution of the contractual relationship and, specifically:
 - a. implementation of pre-contractual measures: for example, verification of the Client's identity and evaluation of the opportunity to establish a contractual relationship, execution of anti-money laundering checks, implementation of the necessary pre-contractual measures;
 - b. finalization of the contractual relationship;
 - c. management and execution of the contractual relationship: for example, fulfillment of all contractual obligations related to the requested service such as faithful and diligent execution of the mandate, verification of the adequacy of the service, management of any requests or complaints.
2. fulfillment of legal and regulatory obligations: for example, in relation to anti-money laundering or tax regulations, or in relation to the Swiss Financial Services Act or Collective Investment Schemes Act, or to requests from audit firms and supervisory authorities;

3. customer profiling: for example, in relation to the definition of the Client's risk profile and *know your customer* (KYC) profile;
4. execution of statistical analyses and related research;
5. exercise of rights or fulfillment of obligations towards the Client or third parties in judicial, extrajudicial, or administrative proceedings, prevention of crimes or execution of investigative activities;
6. fulfillment of information obligations towards processors in charge of managing company functions or supplying products or services;
7. development of services and products.

7. Methods of collection and processing of personal data

Personal data is collected, stored, stored, processed, deleted, or destroyed by adopting tools and procedures that ensure the security and confidentiality of the data. Personal data will be processed without the aid of automated means.

COLOMBO processes sensitive data of the Client if:

1. the processing is necessary to ascertain, exercise or defend a right in court;
2. the processing concerns personal data which are manifestly made public by the Client;
3. the Client has given COLOMBO the explicit consent to process such information (where legally permitted).

8. Retention period

Pursuant to the provisions of art. 6 para. 4 FADP, personal data will be stored by COLOMBO based on the principle of necessity for processing for the entire duration of the contractual relationship and for the period necessary to carry out the purposes related to the contractual relationship. After this period, personal data will be kept for 10 years in accordance with the provisions of the art. 7 of the Anti-Money Laundering Act (AMLA) (except for the receipt of documents or the existence of conditions that may interrupt the running of this term) or, in any case, for the different period defined by the law for the proof of the fulfillment of legal or fiscal obligations or the period necessary to allow COLOMBO to protect its rights in judicial, administrative or in any case before a public authority.

9. Security measures

All COLOMBO employees who have access to the Client's personal data are required to comply with the rules, regulations and internal procedures relating to processing in order to protect personal data and ensure its confidentiality. COLOMBO has also implemented adequate technical and organizational measures to protect personal data from destruction, loss, modification, abuse, disclosure or unauthorized, accidental or illicit access, as well as from all other illicit forms of processing.

10. Subjects who have access to personal data

The Client's personal data may be shared, where necessary, with the following subjects:

1. processors;
2. natural persons acting under the authority of COLOMBO or of the processors for the purposes set out above;
3. third parties who provide COLOMBO with assistance and consultancy services (e.g., accounting, tax, legal, administrative);
4. third parties who provide services for the management of the IT system and telecommunications tools (including email) used by COLOMBO;
5. third parties who have the right to access the data pursuant to legal provisions;
6. competent authorities for the fulfillment of obligations imposed by law and/or by provisions of public bodies upon request;
7. banks within the context of the management of the relationships entrusted to COLOMBO;

8. all those third parties with whom it is necessary to share personal data for the correct fulfillment of the purposes indicated above.

It is specified that the subjects appointed by COLOMBO for the processing of personal data will always be identified and/or appointed, appropriately instructed, and made aware of the constraints imposed by law. Personal data will also be processed by adopting security measures aimed at ensuring the protection of the confidentiality of personal data and avoiding risks of loss or destruction, unauthorized access, or processing that is not permitted or does not comply with the intended purposes. If COLOMBO transfers the Client's data to third parties, COLOMBO ensures that they meet the same security standards. COLOMBO constantly updates and makes the list of processors available at its headquarters.

11. Disclosure of data abroad

The Client's personal data will be kept in Switzerland and will not be transferred abroad.

12. Rights of the data subject

Based on the provisions of the FADP, COLOMBO recognizes in particular the following rights to the Client:

1. right to information: right to get confirmation as to whether or not personal data is being processed and, if so, to get access to the personal data, including a copy of the same, and the communication, among others, of the following information: purpose of the processing, categories of personal data processed, recipients to whom the personal data has been or will be communicated, data retention period;
2. right to correction: right to obtain, without unjustified delay, the correction of inaccurate personal data and/or the integration of incomplete personal data;
3. right to deletion: right to obtain, without unjustified delay, the deletion of personal data;
4. right to restrict processing: right to get the restriction of the processing;
5. right to data portability: right to receive personal data in a structured, commonly used, and machine-readable format, to transmit the data to another controller without hindrance and, where technically feasible, to obtain that the personal data is transmitted directly from COLOMBO to another controller, if the processing is based on consent and is carried out by automated means;
6. right to prohibition of processing: right to object to processing at any time, for reasons related to the Client's situation. In case the Client exercises this right, COLOMBO will refrain from further processing the personal data, provided that there are no compelling legitimate reasons to proceed with the processing anyway;
7. right to file a complaint to the Federal Data Protection and Information Commissioner (FDPIC).

In order to exercise these rights, the data subject may send a request by contacting COLOMBO via email at the following email address: ***privacy@colombo.swiss***

COLOMBO will comply with such requests, as required by the applicable data protection regulations.

13. Contact person for the protection of personal data

COLOMBO has appointed a contact person for the protection of personal data, who can be contacted at the address of the controller indicated above or by sending an email to ***privacy@colombo.swiss***

14. Update of this Information

COLOMBO reserves the right to modify and update this information on personal data processing at its discretion and at any time.

1.9.2023