

Julius Bär

OUR CLIENT PRIVACY POLICY EFFECTIVE DATE: 1 JULY 2020

Julius Baer (Middle East) Ltd. ('JBME', 'we' or 'us') places great importance on its duties to use information it collects about you responsibly and to maintain the confidentiality of that information. Nevertheless, we do have to collect, record and use information about you, and share it within the Julius Baer Group and with third parties, to enable us to provide you with our services and conduct our business properly. The purpose of this Privacy Policy is to explain how we do that.

This Privacy Policy applies to all information-processing activities carried out by JBME, including the processing of personal data about individuals. 'Personal data' in these circumstances means information that relates to a living individual who can be identified from that information, either by itself or when it is combined with other information. It does not include data where the identity has been removed (anonymous data).

If anyone represents you in dealings with us (for example, as your agent or attorney), or you provide us with information about other people that is relevant to the services we provide (such as information about family members), this Privacy Policy also deals with how we handle that information. You should make sure that these people are content that information about them is provided to us, and you should give them a copy of this Privacy Policy. Alternatively, you can ask us to provide them with a copy of this Privacy Policy directly. Please contact your relationship manager if you want us to do this.

For the purposes of data protection laws, JBME is a data controller in respect of personal data that we collect, process and store in connection with the products and services we offer our clients. Other members of the Julius Baer Group with which you have a relationship may also be data controllers of the same personal data and have published their own notices describing how they handle your personal data. Please ask your relationship manager if you would like a copy.

JBME's registered office and head office is at Level 15, ICD Brookfield Place, Dubai International Financial Centre, P.O. Box 504925, Dubai, United Arab Emirates. We are members of the Julius Baer Group. More information about the Julius Baer Group can be found at www.juliusbaer.com.

What information do we collect?

We may collect, use, store and transfer the following kinds of information:

- Identity Data relating to you and anyone who represents you in your dealings with us, including:
 - in the case of individuals, current and previous full names, marital or similar status, title, date and place of birth, gender, residential addresses, nationality, tax status, tax and other officially issued identifiers, and specimen signatures (including in the form of copies of officially issued identity documentation, such as passports and identity cards); and

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- in the case of other clients, legal and trading names, place and date of incorporation or establishment, registered and trading addresses, tax status, tax and other officially issued identifiers, and the identity of the controllers, shareholders and other beneficial owners of the entity in question.
- Contact Data relating to you and anyone who represents you in your dealings with us, including postal address, e-mail address and telephone numbers.
- Financial Data, including information about:
 - your financial objectives and personal circumstances that are relevant to them;
 - your financial affairs, including details of the sources of your wealth, the nature and value of your investment holdings, bank accounts and other assets, the level of your income and your creditworthiness; and
 - your knowledge and experience about financial matters, including your financial history and, where relevant, education, and employment history and experience.

We may also collect some information of this kind about others, such as information you give us about people that are relevant to your financial objectives (for example, your dependents and other family members) and also information about the knowledge and experience about financial matters of anyone who represents you in your dealings with us (such as your agents or attorneys).

- Services Data, including details about the services and products we provide you with, your accounts (including the account numbers), payments to and from your accounts, the investment transactions conducted by or through us or third parties, and the communications between you (or those representing you) and us in this connection.
- Technical Data, including any usernames and passwords used by you with our IT systems, internet protocol (IP) address, browser type and version, login history, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website, as well as information about how you use our website, products and services.
- Marketing Profile Data, such as your communication preferences (including those relating to receiving marketing), your interests, feedback and survey responses.

On occasion, you may also choose to provide us with special categories of personal data that you think are relevant to the services we provide. Such information may relate to:

- your health. For example, you may choose to provide information on specific medical conditions because we are helping you to apply for life insurance and similar products that require that data. You may also choose to provide this information because you think it is relevant to your financial objectives and you want us to take this into account when we advise you.
- your political opinions or religious or philosophical beliefs. For example, you may choose to provide us with information on these because you think it is relevant to the choice of investments we should be able to make for you.

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We will collect this information if and when you choose to give it to us, and if it is directly relevant to the services we provide you with. We do not seek this information from you, and you are not obliged to provide us with it but, if you do not, our services may not meet your needs because we cannot take that information into account. As explained later in this Privacy Policy, you may withdraw your consent to our using this information at any time. If you do, we will cease to use it from then on.

We are also required to collect certain information about you when we establish a relationship with you, and on an ongoing basis during that relationship, to comply with legal and regulatory rules designed to prevent financial crime. It is possible that, on occasion, the information we end up collecting for this purpose may include information that could qualify as special categories of personal data, such as information on your political opinions, religious and philosophical beliefs, and any accusations of or convictions for criminal activity. But we will only collect this information where we believe it is necessary in order to comply with these legal and regulatory requirements.

If we want to use that information for any other purposes, we will obtain your consent for these purposes.

In the case of biometric data, such as your fingerprint or any other biometric identification feature, we will obtain your express consent before using such data for verifying your identity or for allowing you to access certain services or applications.

What happens if you do not provide us with information?

Where we need to collect information by law (for example, to verify your identity) or because it is essential for us to be able to perform our obligations under a contract we have with you for our services, and you do not provide that information when requested, we may not be able to provide you with our services. In this case, we may have to decline to provide the service. But we will notify you at that time if this is the case, where we are allowed to.

Where do we collect your information from?

Most of the information we collect about you will come either directly from you or your representatives in the course of our marketing activities, when we establish the relationship with you or when we agree to provide you with a new service or product. This may include Identity Data, Contact Data, Financial Data and Marketing Profile Data. We will also collect information in the course of providing our services to you, which may include Services Data and Technical Data.

We may also obtain some information (such as Identity Data, Contact Data and Financial Data) from third parties that maintain publicly accessible records (such as electoral registers, commercial registries and land registries) or paid-for data sources (such as credit reference agencies and fraud prevention agencies) as well as from the internet, including public and social media sources. We may do this both at the outset of our relationship and on an ongoing basis. We do this to verify your identity or otherwise to comply with our legal and regulatory obligations, for example.

It is also possible that third parties that participate in the financial system may send us information about you (such as Financial Data or Services Data) as a result of our providing you with our services (for example, when we arrange payments or investment transactions for you through them).

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How do we use your information?

We have set out below a description of the purposes for which we intend to use your information.

Where that information is personal data, we also set out the specific legal bases we rely on to do so. Generally, we do not rely on consent as the legal basis for processing your personal data, other than in relation to marketing activities (which we refer to in more detail below). We usually rely on the need to perform our contractual obligations to you or to comply with legal or regulatory obligations as the basis for disclosure. Where we rely on the protection of our legitimate interests or those of other members of the Julius Baer Group as the basis for processing personal data, we only do so where this does not prejudice your rights and freedoms to an unacceptable extent.

Purpose	Type of data	Reason(s) for processing your personal data
To establish and manage a client relationship between you and us or any other member of the Julius Baer Group, and to provide you with our services or those of other members of the Julius Baer Group (including being able to provide you with investment advice, make investment decisions on your behalf, and execute investment and payment transactions for you).	Identity Data Contact Data Financial Data Services Data	To enter into and perform our obligations under a contract with you. To comply with legal and regulatory obligations.
To maintain records of the performance of our services.	Identity Data Contact Data Financial Data Services Data Technical Data Usage Data Marketing Profile Data	To comply with legal and regulatory obligations. Necessary for our legitimate interests or those of members of the Julius Baer Group (such as being able to deal with complaints or claims made against us).
To enable us to manage and supervise our business and that of the Julius Baer Group as a whole, including conducting financial management, system management, compliance monitoring, physical and technology security monitoring, litigation, internal audits and investigations and other tasks related to risk management, and obtaining professional advice in this context.	Identity Data Contact Data Financial Data Services Data Technical Data Usage Data	To comply with legal and regulatory obligations. Necessary for our legitimate interests or those of the Julius Baer Group (to ensure that our business is managed in accordance with good industry practice and can continue to deliver a high standard of service to our clients).
To undertake mandatory reporting to relevant authorities of the details of transactions we arrange or undertake for you, and details of the assets held, transactions and income arising in your accounts (which may then be shared by those authorities with the corresponding authorities in other countries).	Identity Data Contact Data Financial Data Services Data	To comply with legal and regulatory obligations.

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Purpose	Type of data	Reason(s) for processing your personal data
To comply with other requirements imposed on us by law or regulation (including in relation to the prevention of financial crime) and otherwise to co-operate with judicial, regulatory, tax and other government and public authorities that have jurisdiction over us and other members of the Julius Baer Group.	Identity Data Contact Data Financial Data Services Data Technical Data	To comply with legal and regulatory obligations. Necessary for our legitimate interests or those of the Julius Baer Group, as well as for the public interest (the prevention of financial crime).
To protect our legal rights, such as ensuring payment of fees, charges, and other liabilities owed to us or other members of the Julius Baer Group; dealing with complaints or claims made against us or other members of the Julius Baer Group; and taking out and making claims under insurance policies.	Identity Data Contact Data Financial Data Services Data	Necessary for our legitimate interests or those of members of the Julius Baer Group (to protect our own legal rights).
To give effect to any reorganisation or restructuring of the services or operations of the members of the Julius Baer Group.	Identity Data Contact Data Financial Data Services Data	Necessary for our legitimate interests or those of members of the Julius Baer Group (to organise our affairs and those of the Julius Baer Group efficiently and effectively).
To improve our products and services, market servicing and website, and customer relationships and experiences generally.	Services Data Technical Data Marketing Profile Data	Necessary for our legitimate interests (to improve our products/services, to develop our business and to inform our marketing strategy).
To introduce you to other members of the Julius Baer Group (or occasionally to third parties) that will be able to provide you with services you are seeking, or which we think may be relevant to meeting your needs as you have explained them to us.	Identity Data Contact Data Technical Data Marketing Profile Data	Necessary for our legitimate interests or those of members of the Julius Baer Group (to develop our business). We may also rely on your consent to make an introduction, in some cases.

We may also use aggregated data, such as statistical or demographic data. Aggregated data may be derived from your personal data but is not considered personal data because this data does not directly or indirectly reveal your identity. For example, we may aggregate your Technical Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect this aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data, which will be used in accordance with this Privacy Policy.

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Will we send you marketing communications?

We may use your information to identify and tell you about additional products, services and events that we think may be relevant to you. This is what we mean when we talk about ‘marketing’. Generally, we will only send you marketing communications where we have obtained your consent, and you have the right to withdraw that consent at any time by contacting us.

Whatever you choose, you will still receive investment ideas, statements, and other important information that form part of or relate to the products and services we are already providing you with. We may ask you to confirm or update your marketing choices in the future, for instance, when changes in laws, regulations or the structure of our business require us to do so. If you change your mind, you can update your choices at any time by contacting us.

Whom do we share your information with?

We may share your information with the following people for the purposes we have explained above:

- the entity you hold your accounts with (the ‘custodian’);
- other members of the Julius Baer Group that provide you with services or support us in the conduct of our business;
- third parties that provide services to us or other members of the Julius Baer Group (such as banking, investment, IT, logistics, printing, document storage, telecommunications and consultancy services);
- other third parties with which we or other members of the Julius Baer Group work to provide you with services (including, but not limited to, correspondent banks, sub-custodians, brokers, trading venues and any other third parties through which or with which we may arrange payment and investment transactions for you);
- third parties to which we introduce you, or which you authorise us to share information with;
- third parties that maintain registers and/or databases that may contain information about you or your employees, agents, representatives, beneficial owners and/or other related persons (such as electoral registers, commercial registries, land registries, credit reference agencies and fraud prevention agencies) or which operate internet search engines that are used by us in the course of our business, such as to check your identity or credit status;
- our professional advisers, auditors, insurers and insurance brokers and those of other members of the Julius Baer Group; and/or
- judicial, regulatory, tax and other government and public authorities that exercise jurisdiction over JBME, custodians and/or other members of the Julius Baer Group or their affairs.

We do not share your information outside the Julius Baer Group for marketing purposes unless we have obtained your specific consent that we may do so.

Do we use your information to make automated decisions about you?

We sometimes use systems to process information automatically, for example, to identify relevant products and services for you, support us in giving you investment advice, monitor transactions, combat financial crime, and assess your creditworthiness. However, we do not rely solely on those systems and their output to make decisions for us.

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Do we use fraud prevention agencies?

We may submit personal data, such as clients' and prospective clients' names and contact details, to fraud prevention reference agencies to:

- check the clients' and their representatives' identity and verify the accuracy of other information provided to us; and
- detect possible cases of fraud or other criminal activity.

We may do this at the commencement of our relationship with a client and then periodically after that to comply with our legal obligations as well as to pursue matters of the public interest and protect our legitimate interests in terms of avoiding our services being used to facilitate criminal activities.

Where we do this, the agency will check that data against their own and other databases (including public databases) and may incorporate in those databases the data and results of any such check (including if false or inaccurate information and/or fraud or other criminal activity is identified or suspected). Law enforcement agencies may subsequently access and use this information.

Do we send personal data about you outside the DIFC to be processed?

We may send your personal data to be processed for us outside the DIFC, but will only do so where:

- it will be processed in a country that the DIFC Commissioner of Data Protection has decided has privacy laws that provide an adequate level of protection for that personal data (such as Switzerland or Guernsey); or
- we have put in place a contract with the recipient under which they must protect it to the same standards as if it were being processed in the DIFC.

In any other case where we want to transfer data to another country, we will inform you about it and, if necessary, seek your consent.

Do we monitor and record communications?

We record fixed-line telephone conversations (mobile telephone conversations may also be recorded remotely) held by most of the personnel that you will deal with, since we are required to do so by regulation if such conversations lead to or may lead to certain investment transactions. Accordingly, you must not ask to conduct any telephone call on a telephone line that is not recorded. These recordings may take place without a warning tone or any other notice to alert you.

We use these recordings for training purposes, internal investigations, to check instructions received and investment advice given in the case of any dispute, and for monitoring the performance of our services and our systems, as well as to comply with legal and regulatory requirements. We may have to provide recordings to relevant regulatory authorities if they ask for them.

We also record most other communications sent to or received from us.

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A copy of any recordings of such conversations and electronic communications between you and us relating to investment transactions will be available to you upon request in accordance with your rights stipulated in the DIFC Data Protection Law (DIFC Law No. 5 of 2020), for a period of at least six years pursuant to the requirements of the Dubai Financial Services Authority.

How secure is your information?

We have put in place appropriate physical and electronic security measures to prevent your information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. This includes limiting access to your information to those employees, agents, contractors and other third parties that have a need to know it. These people are also subject to duties of confidentiality.

We have put in place procedures to deal with any suspected breach of our confidentiality obligations and will notify you of a breach where we are legally required to do so.

We transfer information by a variety of means, including by post, fax, telephone or electronic means (including both the Julius Baer Group's own or third-party electronic systems and communication networks). We seek to ensure the security of communications, but using electronic means of communication involves information being transmitted in a way that is inherently less secure. These communications may also be routed through countries other than those where sender and recipient are located, where the legal protections for such information may be less stringent and a greater risk of interception exists. Accordingly, this gives rise to higher risks of unintended disclosure of information about you to third parties, where it is not possible to ensure that such risks are prevented effectively, and consequently there are greater risks of information being manipulated or used in attempted fraud. If this is of concern to you, please raise it with your relationship manager.

How long do we keep your information?

We will keep your information for as long as you are a client of JBME. After you stop being a client, we will usually keep your information for six more years, for one of the following reasons:

- To enable us to deal with any questions, complaints or claims that you or any other party may have for or against us relating to your affairs.
- To enable us to demonstrate our compliance with our obligations to you, and our compliance with the laws and regulations that apply to us.
- To comply with laws and regulations on maintaining the records.

We may keep your data for more than six years if we need to retain it for legal or regulatory reasons. Once the end of the retention period is reached, we may be unable to delete the information fully for technical reasons, but if that is the only reason for not deleting it, we will seek to put it beyond use to protect your rights.

It may be that other members of the Julius Baer Group with which you have relationships also hold your information. They may hold that information longer than JBME does, for their own legal or regulatory reasons, but JBME will not usually have access to information that is kept longer.

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What are your rights in relation to your personal data?

In certain circumstances, you have the following rights relating to your personal data:

- To request access to your personal data. This is to enable you to receive a copy of the personal data we hold about you and to check that we are processing it lawfully.
- To request correction (rectification) of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- To withdraw your consent for us to process your personal data.
- To request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us to continue to hold and use it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- To object to processing of your personal data where we are relying on the public interest or our legitimate interests (or those of a third party).
- To request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you: for example, if you want us to establish its accuracy or that it is being properly used by us. This means that it can only be used for certain limited purposes, such as dealing with legal claims or exercising our legal rights. In this situation, we would not use or share your information in other ways while it is restricted.
- To request the transfer of your personal data to another party where we process it based on your consent or process it by automated means.
- To withdraw any consent you have given to allow us to send marketing communications to you or collect or use your personal data in any other way.

Please note that exercising some of these rights may mean that we are unable to provide our services to you because it is information that is essential to our being able to do so. In other cases, it may mean that we are providing services based on incomplete information, which may mean that those services will not meet your needs. We will tell you if we think this is the case. While none of this affects your rights, you should consider carefully the consequences of exercising those rights.

However, there may also be legal or regulatory reasons why we cannot meet your request; but if this is the case, we will explain our reasons for not being able to, where we are allowed to.

How can you exercise these rights?

If you wish to exercise any of these rights, please contact us at the following address:

Data Protection Officer
Julius Baer (Middle East) Ltd.
ICD Brookfield Place, Level 15
Dubai International Financial Centre
P.O. Box 504925
Dubai, United Arab Emirates
dataprivacy.difc@juliusbaer.com

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How can you complain?

Please let us know if you are unhappy with how we have used your information. You can contact us by writing to the Data Protection Officer at the above address, and we will do our best to resolve your concerns.

Julius Baer (Middle East) Ltd. processes personal data in accordance with the DIFC Data Protection Law (DIFC Law No. 5 of 2020), and is regulated by the DIFC Commissioner of Data Protection in relation to the processing of personal data. You have the right to complain to the DIFC Commissioner of Data Protection, which can be contacted at: Level 14, The Gate, DIFC, P. O. Box 74777, Dubai, UAE, through the DIFC Authority by telephone on +971(0)362 2222 or through the website at www.difc.ae. The website includes details of how to make a complaint.