

Privacy Statement of Bank Julius Baer (Monaco) S.A.M. for clients and business partners

The following information from Bank Julius Baer (Monaco) S.A.M. (the Bank) provides you with an overview of how your personal data is processed by the Bank in its capacity as a data controller. It describes your rights under Law 1.565 of 3 December 2024 on the protection of personal data. The term "you" refers to you as a client, business partner or prospect of the Bank. The term "business partners" includes persons related to a client, such as beneficial owners, employees, family members, authorised signatories, agents and/or representatives.

1 Contact details of the Bank and the data protection officer

Bank Julius Baer (Monaco) S.A.M.
Data Protection Officer
12, Boulevard des Moulins
Principality of Monaco
Dataprivacy.mc@juliusbaer.com

2 Contact details of the Bank's representative in the European Union

Bank Julius Baer Europe SA
Data Protection Officer
25, rue Edward Steichen
2540 Luxembourg
dataprivacy.lux@juliusbaer.com

3 What personal data does the Bank collect and process?

The Bank collects and processes personal data that it obtains from you in the course of its business relationship with you. Personal data includes data that directly identifies you as an

individual (e.g. your name, address, telephone number) or that allows you to be identified when combined with other information (e.g. your account number). In addition to the personal data you provide directly, the Bank also collects and processes personal data about you that it obtains from publicly available sources (e.g. the internet, social media, insolvency registers, land registers, commercial registers and association registers) or from other companies within the Julius Baer Group or third parties.

In particular, the Bank collects and processes the following personal data, without limitation:

- personal information and identification data (e.g. name, address, contact details, date and place of birth, nationality, passport, identity documents, personal circumstances, profession, interests and preferences, professional relationships);
- authentication data (e.g. specimen signatures);
- personal data resulting from the preparation, implementation and execution of contracts and the fulfilment of obligations, particularly in connection with services or transactions (e.g. account, deposit and transaction data, including data on the principal and the recipient, powers of attorney, requests for information and services);
- advertising and sales data;
- contact-related personal data (e.g., correspondence, enquiries, advisory reports, contact notes);
- account details, record-keeping data; information relating to your personal and

For ease of reading, the masculine form represents all gender identities in this document.

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financial situation (e.g. compliance and/or regulatory information such as credit reports, source of wealth and funds, financial knowledge and experience) and/or company-related data (e.g. business activities, purpose, ownership and organisational structure, number of employees);

- sensitive personal data, such as biometric data, information on religious, philosophical or political opinions or activities, health information, information on administrative or criminal convictions or penalties;
- personal data relating to related third parties, in particular beneficial owners, employees, family members, authorised signatories, agents and/or representatives;
- personal data transmitted and recorded automatically when using the Bank's websites, mobile applications or other electronic services (electronic services). This data includes the date and time of access, the names of downloaded files and the amount of data transmitted, the success of the access, your web browser, the browser language and the requesting domain, as well as the IP address;
- other personal data comparable to the above categories.

4 For what purposes does the Bank use your personal data and on what legal basis?

a) For the performance of contractual obligations or pre-contractual measures

The processing of your personal data enables the Bank to offer you the services agreed in the contract, to execute contracts and to take pre-contractual measures in preparation for the contract. The purpose of data processing depends primarily on the banking products you request (e.g. accounts, loans, securities, deposits, brokerage and advice). The Bank uses your personal data in particular for the identification of persons, the verification of

documents, advisory, wealth management, financing and credit services, the trading and execution of transactions, the realisation of collateral, the liquidation of accounts and the settlement of contractual relationships. Further details on this subject (where applicable) can be found in your contractual documents or in the Bank's General Terms and Conditions.

b) Based on regulatory requirements and legal obligations

The activities of the Bank and other companies within the Julius Baer Group are subject to various Monegasque and foreign laws and regulations (e.g. Monegasque law on combating money laundering and terrorist financing, Monegasque data protection law, etc.). The Bank and other companies within the Julius Baer Group must comply with the requirements of the banking supervisory authorities in Monaco and France, in particular the ACPR, CCAF, AMSF, APDP, and their counterparts in other countries, as well as stock exchanges, depositories, brokers and/or other banks in Monaco and abroad. Personal data is processed for purposes including credit checks, identity and age verification, fraud and money laundering prevention, compliance, including Know Your Customer requirements, the fulfilment of tax monitoring and reporting obligations, and the analysis, review, assessment and management of risks within the Bank and other companies of the Julius Baer Group.

c) To preserve and protect the legitimate interests of the Bank

To preserve and protect its legitimate interests, the Bank will also process your personal data for the following purposes (examples):

- communicating with you in connection with your enquiries or potential interest, or to inform you about offers from the Bank and other companies within the Julius Baer Group;

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- establishing a business relationship or contact;
- the prevention and investigation of breaches of contractual obligations, criminal offences and other cases of non-compliance;
- identifying and analysing your potential needs and optimising the customer approach;
- risk management (e.g. calculation of capital requirements to be taken into account by banks) within the Bank and Julius Baer Group companies;
- exercising rights and defending against potential legal disputes, e.g. in connection with tax claims, civil, criminal or administrative proceedings, or seizures of assets held in custody;
- supervision, consolidation and management of data relating to you that is processed by the Bank and Julius Baer Group companies (single client profile);
- consulting and exchanging data with information agencies (e.g. debt collection registers, credit rating agencies, land registers) to determine creditworthiness or default risks in credit transactions;
- professional development, advertising, marketing, market research or surveys;
- IT security and the operation of the Bank's IT tools;
- outsourcing of the Bank's functions and services to Julius Baer Group companies or service providers and agents appointed by the Bank;
- video surveillance for security purposes;
- measures relating to the security of buildings and systems (e.g. monitoring access to premises).

d) Based on your consent

In specific cases, your consent is required for the processing of your personal data. Once your consent has been obtained, the Bank may process personal data for the specific purposes indicated. You may revoke your consent at any time. The processing of personal data carried

out up to the time of revocation is not affected by this.

e) Recording and archiving of communications

The Bank records and stores

- telephone calls made from a landline to staff working in securities trading;
- telephone calls made on a landline with client advisers and assistant client advisers who work with German clients (from and to German telephone numbers and from hidden telephone numbers);
- telephone call metadata (e.g. telephone numbers, time, duration); and
- electronic communications (e-mails, online chats, etc.).

Communications retained by the Bank as described above may be reviewed and used for security and evidentiary purposes (e.g., proof that instructions were given and advice was received, proof of compliance with legal and regulatory obligations).

5 Who has access to your personal data?

a) Disclosure to other companies within the Julius Baer Group

The Bank may disclose your personal data to other Julius Baer Group companies, which may in turn process it, in particular for the performance of tasks and services related to the business relationship between the account holder and the Bank and/or Julius Baer Group companies, for the purposes of international supervision and monitoring, investigations, risk management and compliance.

b) Disclosure to business partners and other third parties

The Bank may disclose personal data to contractual partners and other third parties if this is deemed necessary, e.g. for efficiency gains or internal management, for the performance of your contract and/or for the settlement of transactions (e.g. payment orders, currency and precious metal transactions, sale/purchase/supply/holding

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of securities, funds, options, commodities, derivatives or any other financial instrument).

Recipients may include stock exchanges and their reporting bodies, central depositories, (sub-)custodians, brokers, clearing agencies, banks, trade repositories, transfer agents, administrators, issuers, investment funds, regulatory bodies or other authorities.

c) Communication to internal Group service providers and third parties

The Bank may disclose personal data to other companies within the Julius Baer Group as well as to third-party service providers and their subcontractors (Service Providers) engaged to provide services for the Bank or to whom the Bank outsources functions and business areas. The services or functions may relate in particular to the following areas: IT services (e.g. data hosting and processing, development, support and IT operations), use of internet services (e.g. online commercial register), transaction and service processing (e.g. payments), wealth management services and ancillary activities, services related to the administration, trading, execution and processing of financial instruments and other financial assets, compliance and risk management functions, accounting (financial and controls), financing and credit services, marketing and sales activities, logistics and printing services, debt collection and other back-office and middle-office activities. The Bank requires Service Providers who have access to your personal data to take appropriate measures to ensure confidentiality, data protection and data security.

d) Disclosure to authorities and courts

Where required by law or regulation, or where necessary to protect its legitimate rights and interests, the Bank may disclose your personal data to third parties. These may include public bodies and institutions (e.g. ACPR, CCAF, etc.).

6 Does the Bank transfer your personal data abroad?

The Bank may disclose your personal data to recipients located outside Monaco, including in jurisdictions where Julius Baer Group companies are established (see www.juliusbaer.com/fr/about-us/our-locations/), in other jurisdictions, including EU/EEA member states and other countries that provide an adequate level of data protection as specified by the European Commission, or in other jurisdictions around the world where one of the third parties mentioned in section 5 is located, or where the Bank executes transactions or provides services.

The specific countries to which your personal data is transferred may vary depending on the applicable services and the respective purpose(s) set out in this Privacy Statement.

The recipients of personal data may transmit the information to their branches or Group entities, Service Providers or other market participants or authorities within and/or outside their jurisdiction.

It is possible that certain countries to which the Bank transfers your personal data may not have laws that guarantee the same level of personal data protection as Monaco. In such cases, the Bank will generally ensure an appropriate level of data protection, in particular by implementing contractual, organisational and technical measures.

7 How long are your personal data kept?

The Bank processes and retains your personal data for as long as necessary for the specific purpose for which it was collected or for the fulfilment of its legal and regulatory obligations.

When it is no longer necessary for the purposes

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indicated, the Bank may still retain your personal data and process it on the basis of your consent, if required by applicable laws or regulations, or for further processing.

Examples:

- compliance with retention obligations under applicable legislation;
- the application of special requirements obliging the Bank to retain data;
- compliance or risk management in accordance with applicable laws;
- exercising the Bank's rights in connection with legal proceedings and any type of legal or regulatory action; or
- the Bank's legitimate interest.

8 What are your rights under data protection law?

Several essential principles are respected when processing your personal data, including the principle of purpose limitation, which means that your data may only be collected for specific, explicit and legitimate purposes and may not be further processed in a manner incompatible with those purposes.

In addition, the applicable data protection legislation grants you the following rights:

- Right to information: the bank must take appropriate measures to provide you with all information about the use of your data and facilitate the exercise of this right.
- Right of access: any person, after proving their identity, may obtain confirmation from the bank that their data has been processed and, if so, in , receive a communication in a legible and comprehensible form.
- Right of rectification: to request that this data be rectified if it is incorrect or incomplete;
- Right to erasure: this is a right subject to several criteria that allows you to request that your personal data be deleted, provided that the Bank cannot or should not retain it;

- Right to restriction of processing: request the temporary freezing of the use of some of your data, particularly in specific cases:
 - the data subject disputes the accuracy of the data;
 - the processing is unlawful but the data subject does not wish the data to be erased;
 - the processing is no longer justified by the purpose of the processing, but the individual wishes to establish, exercise or defend their rights in court;
 - the processing is justified on legitimate grounds pursued by the controller and the data subject contests the legitimacy of those grounds. The controller will then "freeze" the processing until it is determined whether its legitimate grounds override those of the data subject.

- Right to object: contesting processing by the Bank
- Right to portability: allows you to receive the personal data provided to the bank and to reuse it and transfer it to another data controller.
- Right not to be subject to automated individual decision-making: in the event of an automated individual decision, request that it be reviewed by a natural person. You also have the right to express your point of view.

You also have the right (where applicable) to lodge a complaint with the competent data protection supervisory authorities.

- Rights of deceased persons: ascendants, descendants up to the second degree, the surviving spouse of a deceased person, cohabitants or partners within the meaning of Law No. 1.148 of 17 December 2019 may, if they can prove an interest, exercise the following rights with regard to the information of deceased persons:
 - the right of access;
 - the right to rectification;
 - the right to erasure;
 - the right to restriction of processing;

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- the right to object;
- the right to data portability.

9 What personal data must you provide to the Bank?

The Bank requires you to provide it with the personal data necessary to establish and implement a business relationship, as well as to comply with the related contractual and/or legal obligations. Without this data, the Bank is generally unable to enter into a contract with you and/or provide the agreed services.

In particular, the Bank is required by anti-money laundering and counter-terrorist financing regulations to identify you using your identification documents before entering into a business relationship with you, and thus to record and store your address, nationality, name, date and place of birth, and the information contained in your identity document. In order for the Bank to comply with these regulations, you are required to provide it with the necessary information. If any changes occur during the course of the business relationship, you are required to inform the Bank without delay. If you fail to provide the Bank with the necessary information, it will not be possible for it to establish or continue a business relationship with you.

10 Does the Bank use an automated decision-making system?

Generally, the Bank does not use a fully automated decision-making system to establish and conduct business relationships. If, in isolated cases, the Bank exceptionally uses such a process, it will inform you separately, as required by law.

11 Are your data processed automatically and used for profiling?

The Bank may process your personal data automatically in certain areas in order to assess certain personal criteria. The Bank may use your personal data for profiling. Profiling refers to any type of automated processing of personal data. Personal data is then used to assess certain personal aspects, in particular to analyse or predict aspects relating to economic situation, personal preferences, interests, reliability, behaviour, geographical location or changes therein. For these purposes, the Bank may use, process and combine publicly available data and third-party data relating to you. Profiling may be carried out, for example, in the following cases:

- to fulfil the legal and regulatory obligations of the Bank, Julius Baer Group companies or service providers and agents engaged by the Bank;
- to verify the customer relationship and combat money laundering, terrorist financing and crimes threatening assets (including in payment transactions). These measures are intended to protect you and to comply with legal obligations;
- to enable the Bank to use assessment tools to provide you with interesting and relevant information about its products and services. This allows it to target its communications and advertising, including market research and opinion polls, according to your needs;
- to assess your creditworthiness, the Bank uses an algorithm based on a mathematical and statistical procedure. This enables it to calculate the probability that customers will meet their payment obligations. The algorithm may, for example, take into account income level, expenses, current commitments, occupation, employer, length of employment, previous experience in the business relationship, contractually agreed repayments on previous loans and information obtained from credit rating

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agencies. The results of the analysis help the Bank make decisions regarding the sale of products and are also an integral part of risk management.

12 Where can you view the Bank's current Privacy Policy?

The current version can be found at www.juliusbaer.com/clientdataprivacypolicy.

The Bank reserves the right to amend this Privacy Statement from time to time and will notify you of any such amendments in an appropriate manner.

13 How can you contact the Bank?

Your client adviser and the Bank's Data Protection Adviser mentioned in section 1 are available to answer any questions you may have regarding the processing of your personal data.

Monaco, October 2025