Julius Bär

Privacy notice of Julius Baer Family Office & Trust Ltd

for Clients and Business Partners

The following information is intended to provide you with an overview of how your personal data is processed by Julius Baer Family Office & Trust Ltd, Switzerland (the Trust Company), as the controller of the personal data and outlines your rights under the data protection legislation. Herein we refer to 'you' as a client, a business partner, or a prospect of the Trust Company. The term 'business partners' includes persons related to a client, such as beneficial owners, beneficiaries, protectors, investment advisors, the trust, an administered company, a non-administered company, and any other person and/or legal entity related to you.

1 Contact details of the Trust Company and the Data Protection Advisor

Julius Baer Family Office & Trust Ltd
Data Protection Advisor
Bahnhofstrasse 36
P.O. Box
8010 Zurich
Switzerland
wpdata.ch@juliusbaer.com

2 Contact details of the Trust Company's representative in the European Union

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

3 Which personal data is collected and processed by the Trust Company?

The Trust Company collects and processes personal data that it receives from you and that it generates as part of the business relationship with you. Personal data includes data that directly identifies you as an individual (e.g. name, address, telephone number); or personal data on a person related to a fiduciary structure (e.g. settlors, beneficiaries, investment advisors, and protectors of a trust); or data that allows for identification when used in connection with other information (e.g. name of the fiduciary structure). In addition to personal data received directly from you, the Trust Company also collects and processes personal data about you from public sources (e.g. the internet, social media, debtor directories, land registers, trade and association registers, the media), or data it receives from other Julius Baer Group companies or third parties.

The Trust Company collects and processes in particular the following personal data about you and/or other persons related to a fiduciary structure (e.g. settlors, beneficiaries, investment advisors, and protectors of a trust):

- personal details (e.g. name, address, contact data, date and place of birth, nationality, passport, ID documents, personal situation, occupation, interests and preferences, business connections);
- professional details (e.g. job title and experience, knowledge of and experience in investment matters);
- family situation (e.g. marital status and children);
- authentication data (e.g. specimen signature);
- request data (e.g. trust distribution requests, letters of wishes);
- personal data arising from the preparation, execution, and performance of contracts and the fulfil-

ment of obligations, particularly in relation to services or transactions;
- information regarding your financial situation (e.g. origin of assets);
- advertising and sales data;
- personal data relating to contacts (e.g. correspondence, enquiries, minutes of consultation, contact notes);
- account details, recordkeeping data, information regarding your personal background and financial situation (e.g. information relating to compliance and/or regulations, such as credit reports, origin of wealth and funds, financial knowledge, and experience), and/or company-related data (such as its business activities, purpose, ownership and organisational structure, and number of employees);
- sensitive personal data, such as biometric data; information regarding religious, ideological, or political views or activities; information relating to health; and information on convictions or sanctions under administrative or criminal law;
- personal data regarding related third parties such as beneficial owners, beneficiaries, employees, family relatives, authorised signatories, agents, and/or representatives;
- personal data on related corporates, trusts, partnerships, and foundations; and personal data on key individuals, such as controllers, shareholders, settlors, protectors, beneficiaries, foundation officials, and underlying policyholders;
- personal data that is transmitted and automatically collected during the use of websites, mobile applications, or other electronic services provided by the Trust Company (electronic services). This data includes date and time of access, name of files downloaded, as well as the amount of data transmitted and the access result, your web browser, the browser language, and the requesting domain and IP address;
- other personal data comparable to the categories outlined above.

The Trust Company is required under Swiss anti-money laundering legislation:
- to verify certain information in relation to parties to a structure with the Trust Company, including their source of wealth. The Trust Company may utilise open source intelligence available using public search engines, information recorded on public media sites, as well as other commercially available, subscription-based sources in order to do this. This open source information may contain special category data such as references to political opinions and affiliations, religious or philosophical beliefs, or to offences committed or alleged to have been committed;
- to screen the names of parties to a structure against international sanctions lists.

4 For what purpose and on what legal basis does the Trust Company use your personal data?

a) To fulfil contractual obligations or take steps prior to entering into a contract

The processing of your personal data allows the Trust Company to provide you with the contractually agreed services, to perform contracts with you, and to take steps prior to entering into a contract. Data processing is primarily driven by the wealth planning services requested by you (e.g. trust and company administration services). The Trust Company uses your personal data, among other purposes, for the analysis of any potential needs; to identify individuals; verify documents; provide advice, wealth planning, and financing; for trading and to support the execution of transactions; as well as to settle contractual relationships. Where applicable, further details can be found in your contract documents or in the Trust Company's General Terms and Conditions of Business.

b) On the basis of regulatory requirements and legal obligations

The Trust Company's activities are subject to various regulations (e.g. the Swiss Anti-Money Laundering Act, the Federal Act on Financial Institutions, FINMA regulations, self-regulatory and supervisory organisation regulations, Swiss Association of Trust Companies membership regulations and circulars, tax laws).
The processing of personal data is used, among other things, for the verification of identity, and age; prevention of fraud and money-laundering; the fulfilment of tax-related, monitoring, and reporting obligations; as well as the assessment, investigation, analysis, and management of risks by the Trust Company and other Julius Baer Group companies.

c) To pursue and protect legitimate interests of the Trust Company

To pursue and protect its legitimate interests, the Trust Company will also process your personal data for the following purposes (examples):
- communication with you in relation to your enquiries or your potential interests;
- initiation of a business relationship and contact;
- prevention and investigation of breaches of contract, criminal acts, and other non-compliance issues;

- identification and analysis of your potential needs, and optimisation of the client contact;
- risk management within the Trust Company and Julius Baer Group companies;
- assertion of rights and legal claims, and defence in legal disputes, e.g. in relation to tax, civil, criminal, or administrative claims or attachments on deposited assets;
- managerial oversight, consolidation, and maintenance of data relating to you that the Trust Company and Julius Baer Group companies process (single client view);
- consultation and exchange of data by or with information agencies (e.g. debt collection registers, credit rating agencies, land registries) for the determination of creditworthiness or default risks in the credit business;
- business development, advertising, marketing, market research, or surveys;
- safeguarding of the Trust Company's IT security and IT operations;
- outsourcing of Trust Company functions and services to Julius Baer Group companies, or to service providers and agents appointed by the Trust Company;
- video surveillance for security purposes;
- measures to ensure the security of buildings and systems (e.g. entry controls).

d) On the basis of your consent

In particular cases, your consent is requested for the processing of your personal data. Provided your consent has been obtained, the Trust Company may process personal data for the specific purposes where indicated. You may withdraw your consent at any time. Please note that the withdrawal of consent has no retroactive effect on the processing of your personal data.

e) Recording and storage of communication

The Trust Company records and retains

- phone calls to the extent required by the applicable laws and regulations;
- metadata of phone calls such as phone numbers, time, and duration; and
- electronic communication (e-mails, chat messages, etc.).

The communication retained by the Trust Company as set out above may be reviewed and used for security and evidence purposes (e.g. evidence of instructions received, advice given, compliance with legal and regulatory requirements).

5 Who can access your personal data?

a) Disclosure to other Julius Baer Group companies

The Trust Company may disclose personal data to other Julius Baer Group companies, which may process such data in particular for the purpose of performing tasks and services relating to your business relationship with the Trust Company and/or Julius Baer Group companies, for the purpose of international supervision and oversight, investigations, and for risk management and compliance.

b) Disclosure to business partners and other third parties

The Trust Company may disclose personal data to contractual partners and other third parties, as this is deemed necessary, e.g. for legal and regulatory purposes, for efficiency gains or internal management purposes, for the performance of the contract with you, and/or for the settlement of transactions (e.g. payment orders, foreign exchange and precious metals transactions, commodities, derivatives, or any other financial instruments).
Recipients may include agents and advisors (including legal and other professional advisors) in any jurisdiction for the purpose of establishing and administering a fiduciary structure (e.g. third-party trust company and service providers), and regulatory bodies or any other authorities.

c) Disclosure to Group-internal and third-party service providers

The Trust Company may disclose personal data to other Julius Baer Group companies and to third-party service providers and their subcontractors (Service Providers) retained to provide services for the Trust Company, or to which it outsources functions and business areas of the Trust Company. The relevant services or functions may concern in particular the following areas: IT services (e.g. data hosting and processing; IT development, support, operation); the use of internet-based services (e.g. online commercial registers); compliance services (adherence to anti-money laundering laws, transaction monitoring, regulatory reporting, including suspicious activity reporting, compliance supervision and reviews, and training and the like); the processing of transactions and services (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; risk management functions; accounting (financial accounting and controlling), and compliance with obligations and duties under the Common Reporting Standards (CRS), the Foreign Account Tax Compliance Act (FATCA), and other reporting regimes (e.g. Beneficial Owners Registers, local tax filings); financing and credit services; marketing and sales-related activities; reporting, logistics, printing services, debt collection, as well as other back and middle office activities. Where the Service Providers have access to your personal data, the Trust Company requires them to comply with appropriate confidentiality, data protection, and data security requirements.

d) Disclosure to authorities and courts

Where required by law or regulation, or necessary to protect its legitimate rights and interests, the Trust Company may disclose your personal data to third parties. This may, among others, include public bodies and institutions (e.g. the Swiss National Bank, financial authorities, law enforcement authorities, supervisory authorities, courts, or other competent bodies).

6 Does the Trust Company transfer personal data across borders?

The Trust Company may disclose personal data to recipients outside of Switzerland, including to jurisdictions where Julius Baer Group companies are established or located, or to other jurisdictions, including the EU/EEA member states and countries with an adequate level of data protection as specified by the European Commission, or other jurisdictions around the world where any of the third parties as outlined under section 5 above are located or where the Trust Company executes transactions or provides services.

The specific countries where the recipients of your personal data are located may vary as they correspond with the applicable services and the respective purpose(s) defined in this privacy notice.

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

Individual countries to which the Trust Company transfers your personal data may potentially not have laws that afford the same degree of protection to personal data as in Switzerland. In these cases, the Trust Company will generally ensure an adequate level of data protection by e.g. contractual, organisational, and technical measures. The contractual measures applied by the Trust Company include agreements that have been approved by the European Commission and the Swiss Federal Data Protection and Information Commissioner (FDPIC), known as standard contractual clauses. You can request an example of a data transfer agreement usually employed by the Trust Company by contacting the Data Protection Advisor.

7 How long will your personal data be stored?

The Trust Company processes and retains your personal data for as long as it is required for the specific purpose for which it was collected, or to comply with legal or regulatory requirements.

If your personal data is no longer required for said purposes, the Trust Company might still retain and process your personal data based on your consent, if required by applicable laws or regulations, or for further processing. Examples for this would be:

- the fulfilment of retention obligations under applicable law;
- the fulfilment of specific regulations that require the Trust Company to retain the data;
- under automatic exchange of information agreements and Organisation for Economic Cooperation and Development (OECD) common reporting standards;
- for compliance or risk management in accordance with applicable laws (including the proper law of the trust or the jurisdiction of the company);
- the exercise of the Trust Company's rights in relation to claims and any type of legal or regulatory action; or
- if it is in the Trust Company's legitimate interest.

8 What are your rights under data protection law?

The applicable data protection legislation grants you the following rights:

- to request that information on personal data that the Trust Company holds on record be shared with you;
- to demand that information be rectified should it be incorrect;
- to ask that your personal data be deleted if the Trust Company is not permitted or is not legally obliged to retain the personal data;
- to demand that the processing of your personal data shall be restricted if
  - you have disputed its accuracy, for the duration needed to verify the accuracy of your personal data, or

  - its processing may lack a legal basis and you prefer a restriction of processing to the deletion of your personal data;
- to object to the processing by the Trust Company if
  - the Trust Company only processes personal data based on its legitimate interests – in this case, it will cease the processing unless this is outweighed by its own interests or it needs to process the data in order to exercise its rights, or
  - the processing is based on your consent (e.g. for direct marketing);
- to demand that your personal data which you have provided to the Trust Company be transferred to a third party indicated by you in a generally useable, machine-readable, and conventional format;
- to demand that an individual automated decision be reviewed by a natural person. You also have the right to state your view.

You also have a right of appeal (as far as this affects you) to the respective data protection supervisory authority.

9 What personal data are you required to supply?

The Trust Company requires you to provide the personal data necessary for the acceptance and execution of a business relationship and for the fulfilment of the associated contractual and/or legal obligations. Unless it obtains this data from you, the Trust Company will most likely be unable to enter into a contractual relationship with you and/or provide the agreed services.

Under the regulations on combating money laundering and the financing of terrorism, in particular, the Trust Company is obligated to verify your identity based on your identification document and, in this context, to collect and store your address, nationality, name, date and place of birth, as well as identification data prior to the commencement of a business relationship (and to renew such identification upon expiry of the underlying document). Furthermore, the Trust Company is obligated to verify the identity of the beneficiaries, protectors, and other parties on the basis of their identification document and, in this context, to collect and store beneficiaries', protectors' and other parties' address, nationality, name, date and place of birth, and identification data prior to the commencement of a business relationship (and to renew such identification upon expiry of the underlying document). In order for the Trust Company to comply with these regulations, you are required to supply it with the necessary information. If this information changes during the business relationship, you are obliged to notify the Trust Company without delay. If you do not provide the Trust Company with the necessary information, it will not be able to commence or continue a business relationship with you.

10 Does the Trust Company use automated decision-making?

As a basic principle, the Trust Company does not use fully automated decision-making for commencing and conducting its business relationships. If the Trust Company does apply this procedure in exceptional cases, it will inform you accordingly where this is a statutory requirement.

11 Is your data processed automatically and used for profiling?

The Trust Company may process your personal data automatically in certain areas with the aim of evaluating certain personal criteria. The Trust Company may use your personal data for profiling. Profiling is any type of automated processing of personal data. This consists of using the personal data to evaluate certain personal aspects relating to you, in particular to analyse or predict aspects concerning the economic situation, personal preferences, interests, reliability, behaviour, and location or change of location. The Trust Company may use, process, and combine publicly available data as well as third-party data about you for this purpose. Profiling may take place, for example, in the following cases:

- to comply with the legal and regulatory obligations of the Trust Company, Julius Baer Group companies, or Service Providers and agents engaged by the Trust Company;
- to check the client relationship and to combat money laundering, terrorist financing, and asset-threatening crimes (including in payment transactions). These measures serve to protect you and to fulfil legal obligations;
- in order for the Trust Company to use assessment tools to provide you with relevant and appropriate information on its products and services. This enables it to carry out demand-based communication and advertising, including market and opinion research.

12 Where can you find the Trust Company's current privacy notice?

You can find the applicable version at www.juliusbaer.com/clientdataprivacypolicy.

The Trust Company reserves the right to amend this privacy notice from time to time and will inform you of such an amendment in an appropriate manner.

13 How can you contact the Trust Company?

Should you have any questions about the treatment of your personal data, please contact your trust officer, your relationship manager, or the Trust Company's Data Protection Advisor mentioned in section 1, who will be pleased to assist you.

Zurich, April 2024