Julius Bär

OUR APPROACH TO CLIENT PRIVACY

EFFECTIVE DATE: 15 NOVEMBER 2023

Julius Baer International Limited ('JB International', '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 Notice is to explain how we do that.

This Privacy Notice applies to all information-processing activities carried out by JB International, 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 Notice 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 Notice. Alternatively, you can ask us to provide them with a copy of this Privacy Notice directly. Please contact your relationship manager if you want us to do this.

For the purposes of data protection laws, JB International 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.

JB International's registered office and head office is at 20-23 Greville Street, London, EC1N 8SS, United Kingdom. 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), as well as images of you that may be contained in such documents or in video surveillance recordings of our premises that we make for security purposes; and
  - 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

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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.
- Personal History Data such as information on the sources of your wealth, your past and current public and business activities, your family relationships and your interests and pastimes.
- Financial Data, including information about:
  - your financial objectives, and personal circumstances that are relevant to them;
  - your financial affairs, including details of 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 and account balances), payments to and from your accounts, the investment transactions conducted by or through us or third parties, and the meetings and 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.

Do we collect data that is particularly sensitive?

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.

We will collect this information if you choose to give it to us, and if it is directly relevant to the services we provide you with. You are not obliged to provide us with it and we will ask you for your consent to do so. However, if you do not allow us to collect it, our services may not meet your needs because we cannot take that information into account. As explained at the end of this Privacy Notice, you may withdraw your consent to our using this information at any time by writing to us. If you do, we will cease to use it from then on.

Occasionally we may be made aware of health conditions which may affect your ability to make decisions about your financial affairs and you are unable to give your consent to our using it or we cannot reasonably be expected to obtain it. This might be, for example, if you have been in an accident or suffered a medical event that has temporarily affected your ability to make your wishes known. In such a case, we may keep a record of this information to help us act in ways aimed at protecting your economic well-being, for example making sure we know that your attorney will be acting for you or adjusting how we provide our services to account for the impact of your health condition. But if circumstances change so we can obtain your consent we, will only continue to collect and use that information if you do give your consent.

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 detect or prevent financial crime. This includes obtaining and retaining copies of identity verification information which could incidentally disclose information about your ethnicity (for example through the picture in that document). It is also 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 (where these have been made public), and any accusations of or convictions for criminal activity. But we will only collect and use 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 update this information and collect further 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).

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 certain special categories of data (as explained above) and 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, analyse your preferences, needs and objectives and provide you with our services or those of other members of the Julius Baer Group (including being able to provide you with wealth planning and investment advice, make investment decisions on your behalf and arrange investment and payment transactions for you).	Identity Data Contact Data Personal History 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 help us to protect you and your interests, for example against the risk of being a victim of financial crime, such as fraud, or other misappropriation of your assets.	Identity Data Contact Data Personal History Data Financial Data Services Data	To comply with legal and regulatory obligations. Necessary for our legitimate interests or those of members of the Julius Baer Group (to limit the risk of us being subject of legal claims).
To maintain records of the performance of our services.	Identity Data Contact Data Financial Data Services Data Technical 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

Purpose	Type of data	Reason(s) for processing your personal data
		being able to deal with complaints or claims made against us).
To provide you with benefits incidental to our relationship, such as arranging events for our clients or for gifts or similar to be sent to you to mark aspects of our relationship or occasions that are significant for you.	Identity Data Contact Data Personal History Data	Necessary for our legitimate interests (to enhance our relationship with our clients).
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, legal and regulatory compliance monitoring, physical and technology security monitoring, litigation, internal audits and investigations, business continuity management, reputation management and other tasks related to the management of the risks to which members of the Julius Baer Group are exposed, and also obtaining professional advice in this context. This may involve consolidating the information that different members of the Julius Baer Group hold about individual clients (i.e. establishing a "single client view") and sharing that consolidated information between them.	Identity Data Contact Data Personal History 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 (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.
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 Personal History 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	Identity Data Contact Data Financial Data	Necessary for the establishment, exercise or defence of legal claims.

Purpose	Type of data	Reason(s) for processing your personal data
Julius Baer Group; dealing with complaints; responding to and defending us, other members of Julius Group companies and our or their officers and employees against any allegations made against us or them, in any legal disputes with clients and third parties and in any investigations undertaken by any judicial, regulatory, tax or other governmental authorities to whose jurisdiction we or they are subject; taking out and making claims under insurance policies; and protecting the Julius Baer brand, including our reputation and that of the Julius Baer Group.	Services Data Technical Data	Necessary for our legitimate interests or those of members of the Julius Baer Group (to protect our own rights and interests).
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 develop our business though identifying the needs and preferences of our clients (for example through client surveys and data analysis) and so improve our product and service offering, our marketing and website, and our client 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 Personal History Data Services 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 Notice.

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') and other members of the Julius Baer Group who provide you with services;
- third parties with whom we or other members of the Julius Baer Group deal in the course of providing 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 the safeguarding and administration of your assets, payments and investment transactions for you) or incidental benefits (such as event organisers and luxury goods and services providers);
- other members of the Julius Baer Group, third parties and their subcontractors that provide services to us or otherwise support us in the management and operation of our business such as by providing us with investment and wealth management related services, compliance and risk management services, financial accounting and controlling services, IT and telecommunications services (including in particular "cloud"-based IT services such as application development, hosting, operation and support and data hosting and processing), marketing and sales-related activities and other corporate services (such as reporting services, logistics, printing and document storage);
- 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;
- other members of the Julius Baer Group for the purpose of enabling them to manage and supervise their business (including the legal and business risks to which that business is exposed) and that of the Julius Baer Group as a whole;
- our professional advisers, auditors, insurers and insurance brokers and those of other members of the Julius Baer Group;
- judicial, regulatory, tax and other government and public authorities that exercise jurisdiction over JB International, custodians and/or other members of the Julius Baer Group or their affairs; and/or
- third parties to which we introduce you, or which you authorise us to share information with.

We may exceptionally share information with the public or media in circumstances where you or your representatives have made inaccurate or misleading statements to the public or media that we consider are damaging to the Julius Baer brand, including by damaging our reputation or that of other members of the Julius Baer Group or our or their respective officers and employees. But we will only do so to the extent reasonably necessary to correct the factual record.

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 products and services that may be relevant to 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.

Do we use fraud-prevention agencies?
We may submit personal data, such as clients' and prospective clients' names and contact details, to fraud prevention 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.

Currently we use the CallValidate service provided by TransUnion International UK Limited. How TransUnion will use the data submitted is set out in its bureau privacy policy, which can be found at www.transunion.co.uk/legal/privacy-centre. Alternatively, you can write to us to request a copy.

Do we send personal data about you outside the United Kingdom to be processed?
We may send your personal data to be processed for us outside the United Kingdom. But we will only do so where:

- it will be processed in a country that has privacy laws that give the same degree of protection as the laws of the United Kingdom (such as Switzerland, Guernsey, Jersey or members of the European Economic Area); and/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 United Kingdom.

Where the person we send it to wishes to send it to be processed by another party which operates in another country we take steps to ensure they also protect your data to the same standards.

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 telephone conversations and other communications with 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.

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 for a period of at least five years.

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. These include a range of physical and technical security measures, including limiting access to your information to those employees, agents, contractors and other third parties that have a need to know it and. These individuals 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.

Where we share information with other members of the Julius Baer Group, third parties and their subcontractors, we take steps to ensure that they take appropriate measures to ensure your information is kept confidential and secure.

We transfer information by a variety of means, including by post, 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 some of these electronic means of communication (such as e-mail) involve information being transmitted in unencrypted form, which 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 JB International. After you stop being a customer, we will usually keep your information for six more years, for 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 JB International does, for their own legal or regulatory reasons, but JB International will not usually have access to information that is kept longer.

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 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 carefully consider the consequences of exercising those rights.

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:
The Data Protection Coordinator
Julius Baer International Limited
20-23 Greville Street
London

EC1N 8SS
United Kingdom
data.uk@juliusbaer.com

If you are resident in the European Economic Area, you can also contact Julius Baer International Limited's representative in the European Union for data protection matters, Bank Julius Baer Europe S.A., whose address is 25 rue Edward Steichen, L-2540 Luxembourg. You should address your request to the Data Protection Officer there.

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 Coordinator at the above address, and we will do our best to resolve your concerns. If you are in the European Economic Area, you can also write to the Data Protection Officer at Bank Julius Baer Europe S.A., our representative in the EEA, at the address above.

Julius Baer International Limited processes personal data in accordance with applicable United Kingdom law and is regulated by the United Kingdom's Information Commissioner in relation to the processing of personal data. You therefore also have the right to complain to the Information Commissioner's Office, which can be contacted on telephone number 0303 123 1113 and whose website is www.ico.org.uk. The website includes details of how to make a complaint.

If you are resident in the European Economic Area, you may also have the right to complain to the data protection authority in the country where you are resident.