



# Privacy policy

This text applies mutatis mutandis to females and plurals.

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Data protection is of a particularly high priority for CV Invest Partners AG (hereinafter referred to as the "Asset Manager"). By means of this data protection declaration, the asset manager informs about the type, scope and purpose of the personal data collected, used and processed by the asset manager and about the rights of the person concerned. The extent to which the asset manager processes personal data is largely determined by the products purchased by the data subject, the agreed service and the legal and regulatory obligations regarding the collection and processing of personal data.

## 1. Protection of personal data

The protection of personal data is the asset manager's top priority. The personal data of clients are subject to professional secrecy. Personal data is treated as strictly confidential and protected from access by unauthorized third parties. Persons who are not subject to a duty of confidentiality do not have access to the personal data collected. The asset manager also ensures that the recipients of the personal data comply with the applicable data protection provisions.

## 2. Sources of personal data of the asset manager

In connection with business relationships with clients or potential clients ("clients") and natural persons or legal entities associated with the client, those data are processed which the asset manager receives from the person concerned (e.g. clients). Likewise, the asset manager may obtain data from service providers, public registers (e.g. Commercial Register, Swiss Official Gazette of Commerce) or authorities which the asset manager requires for the provision of the service or for legal or regulatory reasons.

Associated natural or legal persons shall be deemed to include, in particular, any:

- Authorized Representative or Signatory,
- beneficial owners and control holders,
- Payee of a specific payment transaction or
- any other natural or legal person who has a relationship with the client that is relevant to the business relationship between the client and the asset manager.

## 3. Types of personal data processed by the asset manager

The categories of personal data that the asset manager processes include personal information (e.g. names, date/place of birth, marital status, address, interests, family relationships, contact details (telephone number or email address), transaction data, financial circumstances, investment objectives, professional information, data when using the asset manager's website (e.g. IP address, cookies), as well as other information regarding powers of attorney, personal relationships, regulatory relationships, log files).

It is possible that data other than the aforementioned will be processed when concluding a specific service or product offered. This may include, for example: Order data, sales, documentation data, investment behavior, investment strategy, balance sheets and other business data.

Insofar as the asset manager processes personal data requiring special protection, it shall do so in context:

- with processing for which explicit consent has been given by the data subject.
- with processing that relates to personal data that the data subject has made public or has been made public.
- with compliance with legal or regulatory obligations.

## 4. Purposes of data processing

The asset manager collects and processes only those personal data that are necessary to achieve a specific purpose. Personal data is processed in particular for the following purposes:

- In connection with the client business, i.e. in order to be able to provide the products and services offered by the asset manager, e.g. for the (possible) opening or management of a business relationship.

- In order to comply with legal and regulatory obligations, e.g. the Anti-Money Laundering Act (AMLA), Financial Services Act (FID-LEG), disclosure obligations to authorities.
- In connection with marketing, i.e. to improve offered products and services or to offer new products and services, e.g. by means of direct marketing, newsletter dispatch, operation of the website.

## 5. Compliance with data protection principles

The asset manager processes personal data in particular in compliance with the Federal Data Protection Act (FADP) and the Data Protection Ordinance (DPA). In doing so, the asset manager checks when processing personal data that the personal data is processed lawfully as well as in accordance with the principle of good faith and proportionately. The data is processed in the manner specified when it was obtained, as it is recognizable to the person concerned or as provided for by a law. The asset manager shall not process the personal data covertly or secretly, unless a law so provides. Personal data shall be obtained by the asset manager only for a specific purpose recognizable to the person concerned. Taking into account the state of the art and the implementation costs, the asset manager shall ensure by means of suitable technical and organizational measures that the personal data processed:

- are only accessible to authorized persons,
- are available when they are needed,
- not be changed unauthorized and unintentionally and
- be processed in a comprehensible manner.

Should it become apparent that personal data is incorrect or incomplete, the asset manager will correct, delete or destroy the personal data, unless a law or regulatory provisions prohibit this.

## 6. Basics of personal data processing

Where necessary, the Asset Manager processes Personal Data for the following reasons:

### 6.1 Overriding public or private interest

The asset manager processes personal data for the initiation or conclusion of a contract, for the fulfillment of the obligations arising from a contract (e.g. consulting/administrative services or the execution of orders and transactions), for measures to improve products and services.

The asset manager has further legitimate private interests to process personal data:

- to secure or enforce the asset manager's claims against the client,
- in the collection of claims of the asset manager against the client,
- in the event of legal disputes between the asset manager and the client,
- in the case of searches for beneficiaries in the absence of contact or news.

### 6.2 Legal basis

The asset manager is obliged to process personal data on the basis of various legal and regulatory foundations. These include, in particular, legal obligations, e.g. the Financial Market Supervision Act, the Financial Institutions Act, the Anti-Money Laundering Act, the Financial Services Act, etc.

### 6.3 Consent

If consent is required for the purpose of processing personal data, the asset manager will obtain this from the person concerned. The consent given can be revoked at any time. A corresponding revocation only takes effect from the time of receipt by the asset manager and does not affect the lawfulness of the processing of personal data until the revocation. There may be reasons (e.g. based on a law) which make it necessary to process the personal data despite the revocation. A revocation may lead to the restriction of certain services or the termination of the business relationship.



## 7. Storage period of personal data

The asset manager processes and retains the personal data for as long as is necessary to fulfill the purpose for which the personal data was collected or to fulfill the contractual or legal obligations. As a rule, this is 10 years after the service has been provided or after the business relationship has ended.

If personal data cannot be deleted, technical and organizational measures are taken to ensure that:

- procedures are implemented to ensure the integrity of the data, in particular the authenticity and integrity of the data or documents (e.g. digital signature or time stamp). In addition, it is ensured that the data cannot be subsequently modified without this being detectable;
- the contents of the data are traceable at all times
- logging and documentation of accesses and logins is carried out by means of "log files".

## 8. Rights from data protection

In principle, the data subject is entitled to the following rights, unless otherwise required by law:

- Information about personal data,
- Correction of personal data,
- Release of personal data,
- Transfer of personal data,
- Prohibition of specific personal data processing,
- Restriction of the processing of personal data,
- Prohibition of disclosure of personal data to third parties,
- Revocation of the granted consent to the processing of personal data,
- deletion as well as objection of the collected personal data.

The modalities concerning the exercise of the above-mentioned rights of the person concerned and obligations of the asset manager, such as oral or written form, are to be clarified between the person concerned and the asset manager by mutual agreement. If the provision of information, the issuance or transfer of data involves a disproportionate effort, the asset manager may insist on a contribution to the costs up to a maximum of CHF 300.

## 9. Recipients of personal data

Personal data is processed only by those persons who need it to fulfill contractual or legal obligations. If necessary, service providers and third parties (e.g. outsourcing partners) are given access to the data. In this context, professional secrecy and other legal provisions are observed.

Service providers and third parties as recipients of personal data may be, for example:

- Order processors and other service providers (e.g. suppliers),
- public bodies (e.g. authorities), if a legal or official obligation provides for this.

## 10. Data transmission abroad

As a matter of principle, no data is transferred abroad. If personal data is transferred abroad, this will take place in compliance with the legally prescribed provisions and where this is necessary for the fulfillment of the contract (e.g. for the processing of international transactions or order execution at foreign trading centers). If order processors are used abroad, they will be obliged to comply with professional secrecy and the Data Protection Act.

## 11. Data related to the Internet presence

### 11.1 General

The following information sets out how the asset manager processes data on the occasion of the Internet presence.

The website of the asset manager can be used without registration and thus without transmission of personal data. Personal data will only be processed by the asset manager to the extent that this is necessary for the implementation of the services and products offered.

Personal data - with the exception of the IP address - is not automatically collected for the purpose of obtaining the services offered. If personal data is collected, it must be provided by the person concerned.

### 11.2 Cookies

In order to make the visit to the website attractive and to enable the use of certain functions, so-called cookies are used on the website. These are small text files that are stored on the user's terminal device. Some of the cookies used are deleted after the end of the browser session, i.e. after closing the browser (so-called session cookies). Other cookies remain on the end device and enable the browser to recognize the user on the next visit (persistent cookies). If cookies are set, they collect and process certain user information to an individual extent, such as browser and location data and IP address values. Persistent cookies are automatically deleted after a specified period of time, which may vary depending on the cookie.

If cookies stored on the device are to be restricted or blocked, this can be done via the browser settings. Information on this can be found in the help function of the browser. If cookies are disabled, not all functions of the asset manager's website will be available.

### 11.3 Other possible analysis tools

#### Google Maps

This website uses the offer of Google Maps. This allows us to display interactive maps directly on the website and enables you to comfortably use the map function. By visiting the website, Google receives the information that you have accessed the corresponding subpage of our website. This occurs regardless of whether Google provides a user account through which you are logged in or whether there is no user account. If you are logged in to Google, your data will be directly assigned to your account. If you do not want the assignment with your profile at Google, you must log out before activating the button. Google stores your data as usage profiles and uses them for the purposes of advertising, market research and/or demand-oriented design of its website. Such an evaluation is carried out in particular (even for users who are not logged in) to provide needs-based advertising and to inform other users of the social network about your activities on our website. You have the right to object to the creation of these user profiles, whereby you must contact Google to exercise this right. For more information on the purpose and scope of data collection and processing by Google, as well as further information on your rights in this regard and settings options for protecting your privacy, please visit: [www.google.de/intl/de/policies/privacy](http://www.google.de/intl/de/policies/privacy).

#### Google Analytics

This website uses Google Analytics, a web analytics service provided by Google Ireland Limited. If the data controller on this website is located outside the European Economic Area or Switzerland, Google Analytics data processing is carried out by Google LLC. Google LLC and Google Ireland Limited are hereinafter referred to as "Google". The statistics obtained enable us to improve our offer and make it more interesting for you as a user. This website also uses Google Analytics for a cross-device analysis of visitor flows, which is carried out via a user ID. If you have a Google user account, you can deactivate the cross-device analysis of your usage in the settings there under "My data", "Personal data". The legal basis for the use of Google Analytics is Art. 6 para. 1 p. 1 lit. f DS-GVO. The IP address transmitted by your browser as part of Google Analytics will not be merged with other data from Google. We would like to point out that on this website Google Analytics has been extended by the code "anonymizeIp();" to ensure anonymized collection of IP addresses. This means that IP addresses are processed in abbreviated form, which means that they cannot be linked to a specific person. If the data collected about you is personally identifiable, this is immediately excluded and the personal data is deleted immediately. Only in exceptional cases will the full IP address be transferred to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity and providing other services relating to website activity and internet usage to the website operator. For the exceptional cases in which personal data is transferred to the USA, Google has submitted to the



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#### Google Web Fonts

This website uses so-called web fonts provided by Google for the uniform display of fonts. When you call up a page, your browser loads the required web fonts into its browser cache in order to display texts and fonts correctly. If your browser does not support web fonts, a standard font is used by your computer. You can find more information on Google Web Fonts at <https://developers.google.com/fonts/faq> and in Google's privacy policy: <https://www.google.com/policies/privacy/>

#### Newsletter data

If you would like to receive the newsletter offered on this website, we require an e-mail address from you as well as information that allows us to verify that you are the owner of the specified e-mail address and agree to receive the newsletter. Further data will not be collected. We use this data exclusively for sending the requested information and do not pass it on to third parties.

You can revoke your consent to the storage of the data, the e-mail address and their use for sending the newsletter at any time, for example via the "unsubscribe link" in the newsletter.

#### Contact form

If you send us inquiries via the contact form, your data from the inquiry form including the contact data you provided there will be stored by us for the purpose of processing the inquiry and in case of follow-up questions. We do not pass on this data without your consent.

#### Twitter

This website uses functions of Twitter, Inc., 1355 Market St, Suite 900, San Francisco, CA 94103, USA. When you call up our pages with Twitter plug-ins, a connection is established between your browser and the servers of Twitter. In the process, data is already transferred to Twitter. If you have a Twitter account, this data can be linked to it. If you do not want this data to be associated with your Twitter account, please log out of Twitter before visiting our site. Interactions, in particular clicking on a "re-tweet" button, are also passed on to Twitter. You can learn more at <https://twitter.com/privacy>.

#### LinkedIn

We use the marketing services of the social network LinkedIn of LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland ("LinkedIn") within our online offer. These use cookies, i.e. text files that are stored on your computer. This enables us to analyze your use of the website. For example, we can measure the success of our ads and show users products in which they were previously interested. For example, information on the operating system, the browser, the website you previously visited (referrer URL), which websites the user visited, which offers the user clicked on, and the date and time of your visit to our website is collected. The information generated by the cookie about your use of this website is transferred pseudonymously to a LinkedIn server in the USA and stored there. LinkedIn therefore does not store the name or email address of the respective user. Rather, the above-mentioned data is

only assigned to the person for whom the cookie was generated. This does not apply if the user has allowed LinkedIn to process without pseudonymization or has a LinkedIn account. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. You can also object to the use of your data directly at LinkedIn: <https://www.linkedin.com/pset-tings/guest-controls/retargeting-opt-out>. We use LinkedIn Analytics to analyze and regularly improve the use of our website. The statistics obtained allow us to improve our offer and make it more interesting for you as a user. All LinkedIn companies have adopted the standard contractual clauses to ensure that the data traffic to the USA and Singapore necessary for the development, implementation and maintenance of the services takes place in a lawful manner. If we ask users for consent, the legal basis for processing is Art. 6 (1) lit. a DSGVO. Otherwise, the legal basis for the use of LinkedIn Analytics is Art. 6 para. 1 p. 1 lit. f DSGVO. Third-party provider information: LinkedIn Ireland Unlimited Company Wilton Place, Dublin 2 Ireland; [User Agreement](#) and [Privacy Policy](#).

#### **12. Subject to change**

The asset manager reserves the right to adapt the data protection declaration at any time in compliance with data protection law. The current version of this privacy policy is available on the website of the asset manager.

#### **13. Contact details**

The asset manager is considered to be responsible for the processing of personal data. Inquiries in connection with data protection can be made to:

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