



CLIENT PRIVACY NOTICE

Perennium SA (“**Perennium**”, “**we**”) places significant importance on the protection of its clients’ (“**Client**”, “**Clients**”, “**you**”) personal data and is committed to processing them in accordance with the Federal Act on Data Protection (nFADP), which came into effect on September 1, 2023.

This notice (“**Notice**”) aims to inform the Client about the types of personal data collected, the legal bases and purposes of the processing of this data, as well as the Client's rights. It complements the General Terms and Conditions signed by the Client.

1. Types of collected personal data

Personal data encompasses all information that directly (e.g., through one's name, first name) or indirectly (e.g., through a passport number) identifies a natural person.

In the scope of its activity, Perennium is required to collect and process personal data about the Client and individuals associated with the Client (such as family members, economic beneficiaries, authorized representatives etc). The Client undertakes to provide this Notice to these individuals for their information. Personal data related to the Client as well as each individual linked to the Client are hereinafter referred to as “**Personal Data**”.

The categories of processed Personal Data include, but are not limited to:

- personal details such as name, ID number, date of birth, compliance-related documents (including a national identity card or passport copy), address, gender, nationality, contact information (phone number, electronic and physical address), and family details (such as marital status, spouse and children's names);
- professional information (such field of activity, position, employer's name, experience);
- financial information, including source(s) of wealth, revenues, financial assets, real assets, liabilities, taxes and investments; as well as bank account(s);
- transaction data, such as details about payments to and from you, and explanations as to the reasons for such transactions (including related documents);
- tax domicile, and other tax-related documents and information;
- knowledge and experience in investment matters, risk appetite, and investment objectives.

This information is collected directly from the Client and, in certain cases, from publicly accessible sources such as the Internet, the media, data-collection companies, debt or commercial registers, or from third parties we may appoint.



2. Legal basis and purpose for which we process personal data

Perennium processes Personal Data to fulfill its contractual obligations towards the Client or its legal or regulatory obligations, particularly in the fight against money laundering and the financing of terrorism.

Perennium processes Personal Data for the following purposes:

- to identify you as a new customer and verify your identity, source of wealth etc (upon entering into a contractual relationship); to keep this information up to date;
- to deliver suitable products and services to you;
- to ensure proper management and monitoring of the business relationship with you and the execution of transactions in accordance with your instructions;
- to conduct legal and other regulatory compliance checks (e.g., to comply with anti-money laundering regulations or implement international sanctions);
- to be able to respond to any potential inquiries or requests from a supervisory administrative authority or a judicial authority.

Perennium does not process Personal Data for commercial prospecting (marketing) purposes. Perennium does not engage in "profiling" within the meaning of Swiss data prospecting legislation, which refers to automated processing of personal data to evaluate certain personal aspects related to an individual, particularly to analyze or predict elements concerning work performance, economic situation, health, personal preferences, interests, reliability, behavior, location, or movements of that individual.

3. Confidentiality

Perennium is subject to confidentiality obligations arising, in particular, from professional secrecy. The Personal Data processed by Perennium are subject to these obligations. We draw your attention to the relevant article in our General Terms and Conditions, which outlines the situations in which professional secrecy may be lifted.

4. Disclosure of Personal Data

While providing its services, Perennium may need to disclose Personal Data to:

- public authorities, regulators or governmental bodies, judicial authorities;
- financial services providers (such as custodian banks or asset managers);
- subcontractors in the context of outsourced IT and compliance services, who are contractually bound to confidentiality;
- our regulatory audit firm.

Personal data may be disclosed to the above-mentioned entities outside of Switzerland, in compliance with Swiss data protection legislation. If a disclosure is made to a country that does not offer an adequate level of protection according to Swiss data protection law, Perennium ensures appropriate safeguards are implemented on a technical, operational, or legal basis so as to protect Personal Data.



5. Personal Data retention

The period during which Personal Data is retained depends on the applicable legal and regulatory retention period, as well as the purpose of data processing. In accordance with Swiss law, Perennium is required to retain personal data for a period of 10 years from the end of the business relationship. A longer retention period may be justified to enable Perennium to establish facts, exercise its rights, or defend itself against a current or future claim, or to allow Perennium to respond to an investigation by a public authority, in Switzerland or abroad.

6. Clients' rights in connection with Personal Data

Within the framework and limits of applicable regulations, Clients have the following rights in relation to Personal Data:

- The right to access their Personal Data;
- The right to have their Personal Data corrected when inaccurate or incomplete;
- The right to object to the processing of their Personal Data;
- The right to request the restriction of the processing of their Personal Data;
- The right to request the erasure of their Personal Data. This right is not absolute and may be restricted based on overriding interests that require the continuation of Personal Data processing, including legal obligations to retain data.

Perennium is committed to keeping Personal Data accurate and up to date; therefore, in case of any changes, the Client should inform Perennium as soon as possible.

The Client is hereby cautioned that, without certain personal data, Perennium may not be able to provide certain services or products for which the processing of such data is required.

To exercise the above rights, please contact us in writing at Perennium SA, rue Charles Bonnet 4, 1206 Geneva.

Perennium SA reserves the right to modify this Notice at any time. A new privacy notice will be uploaded onto Perennium's website (www.perennium-wealth.com) when we make any updates.

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