

# CUSTODIA WEALTH MANAGEMENT SA

## Data Protection Statement for Clients

This data protection statement provides information about how and why Custodia Wealth Management SA collects and processes your personal data.

### Scope of application

In compliance with the requirements of Article 19 of the Federal Act on Data Protection, Custodia Wealth Management SA as the Data Controller informs you that your personal data, collected exclusively for the purpose of establishing, perfecting and managing your business relationship will be processed in full compliance with the obligations and principles of the law, ensuring full protection of your rights.

### Definitions

The following definitions apply:

**Personal data:** any information concerning an identified or identifiable natural person;

**Data subject:** the natural person whose personal data are being processed;

**Personal data worthy of special protection:**

1. data concerning religious, philosophical, political or trade union opinions or activities;
2. data concerning health, intimacy, or race or ethnicity;
3. genetic data;
4. biometric data that uniquely identify a natural person;
5. data concerning administrative and criminal prosecutions and penalties;
6. data concerning social welfare measures.

**Processing:** any operation with personal data, regardless of the means and procedures used, namely the collection, recording, storage, use, modification, disclosure, archiving, deletion or destruction of data;

**Disclosure:** transmitting or making personal data accessible;

**Profiling:** automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects of a natural person, in particular to analyze or predict aspects concerning that person's professional income, economic situation, health, preferences, interests, trustworthiness, behavior, places of stay, and movements;

**Data controller:** the individual or federal agency that, individually or together with others, determines the purpose and means of processing;

**Data processor:** the private individual or federal agency that processes personal data on behalf of the data controller.

### For what purposes your personal data are used

The Data Subject's data are collected to enable the Data Controller to provide the service and meet

contractual obligations, fulfill legal obligations, respond to requests or enforcement actions, protect its own rights and interests or those of other clients or third parties, and detect any malicious or fraudulent activities.

Data are processed in order for Custodia Wealth Management SA to provide its services in the context of the execution of contracts with its clients or pre-contractual measures.

In addition, Custodia Wealth Management SA is subject to legal obligations, regulatory requirements (e.g., under the Federal Banking Act, the Federal Act on Collective Investment Schemes, the Federal Act on Combating Money Laundering and Terrorist Financing in the Financial Sector, the Mortgage Bond Act, FINMA Ordinances and Circulars, and tax laws) and banking authorities (e.g., Swiss National Bank, FINMA) and is required to process personal data in compliance with these obligations.

The purposes of processing include checks about identity, prevention of fraud and money laundering, and fulfillment of control and information obligations under tax laws.

Custodia Wealth Management SA uses video surveillance systems to protect the company's assets, the right to prevent unauthorized persons from entering company premises, and to ensure the safety of its employees, contractors and visitors.

## Which personal data are processed by Custodia Wealth Management SA

Custodia Wealth Management SA processes personal data obtained from its clients as part of its business relationship. In addition, personal data obtainable from freely accessible public sources (e.g. debt registers, land registers, commercial and association registers, press, Internet) are processed where necessary to provide the services contractually. Customer assessment activities are not carried out in an automated manner but result from analyses performed by natural persons. Therefore, no processing in the nature of profiling is carried out.

For the above purposes, when visiting company premises, Custodia Wealth Management SA processes images captured by the video surveillance system.

## Disclosure of personal data abroad

Your personal data may be disclosed abroad only in recipient states for which the Federal Council has found legislation that provides adequate data protection.

## Duty to provide data

Only data essential for the establishment and maintenance of the business relationship are required. Without such data, Custodia Wealth Management SA generally cannot enter into or execute a contract for the provision of its services.

The personal data requested are necessary for the purposes of initiating and executing a business relationship and fulfilling related contractual obligations, as well as fulfilling legal obligations.

## How long your data are stored

Custodia Wealth Management SA will process and store your personal data for as long as necessary to comply with its contractual and legal obligations and to secure its rights and interests. When these needs cease, your data will be deleted.

## Who has access to your personal data

Within Custodia Wealth Management SA, any organizational unit and any external data processor who needs the data to fulfill their contractual and legal obligations, as well as to protect their own legitimate interests, will have access to your data.

Your personal data may also be disclosed to third parties such as lending institutions acting on your behalf or agencies that provide rating services on client financial, regulatory and reputational risk and to financial sector regulators (Ex. FINMA, Swiss National Bank), or to judicial authorities as needed or requested by them, as well as third parties providing audit, consulting, legal, accounting or insurance services

Your personal information will not be disseminated in any way unless specifically agreed to

## What your data protection rights are

Every Data Subject has the right, free of charge and at any time, to access his or her data and, where permitted by law, the right to rectification, the right to erasure, the right to restriction of processing, the right to object to processing and, where applicable, the right to data portability.

If you would like to ask questions about data processing or make requests to exercise your rights, you can contact us by writing to the email address: [data-protection@custodiawm.ch](mailto:data-protection@custodiawm.ch)

## Data Controller

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This document may be changed at any time without notice.