

Data protection statement

Schoeb Frôté SA is an asset management company based in Switzerland and subject to federal data protection regulations, it being specified that it is also subject to strict professional secrecy obligations.

Here we provide information about the personal data we collect, including how this data is processed and for what purposes.

1 Who processes your personal data?

The data controller is Schoeb Frôté SA, Faubourg du Lac 11, 2000 Neuchâtel.

You can contact the company:

- by email: info@schoebfrote.ch
- by telephone: 032 722 17 02
- by post: Faubourg du Lac 11, 2000 Neuchâtel

2 What data do we process about you?

We collect the following data directly from you:

- Identity (first name, last name, date of birth, gender).
This data is retained for 10 years after the end of the contractual relationship for legal reasons or for evidence purposes pending the expiry of the applicable limitation periods.
- Contact details (postal address, email address, telephone number) and marital status.
This data is kept for 10 years after the end of the contractual relationship for legal reasons or for evidence purposes pending the expiry of the applicable limitation periods.
- Billing data (amount and due date of invoices, reminders, supporting documents).
This data is retained for 10 years after the end of each financial year, in accordance with Art. 958f CO.
- Correspondence (email exchanges, telephone records, postal mail). This data is retained for 10 years after the end of the contractual relationship for legal reasons or for evidence purposes pending the expiry of the applicable limitation periods.
- Technical data (IP address, etc.). This data is retained for 12 months after collection for technical and security reasons relating to our IT systems.
- Your bank details resulting from our business relationship.
- Any other information you have provided to us in connection with the performance of a mandate on your behalf or our communications. For example, the contact details of the organization that employs you, or on behalf of which you are contacting us, data concerning your professional situation, data concerning your health, your financial situation, etc.

We also collect the following data from third parties:

- Certain data from publicly available sources (e.g., debt collection register, land register, commercial register, press, Internet).
- Certain data obtained from authorities and other third parties (e.g., in the context of administrative and legal proceedings).
- Data about you that is provided to us by people in your circle (family, legal representatives, etc.) so that we can conclude or execute contracts with you (e.g., delivery address, powers of attorney, data relating to compliance with legal requirements such as anti-money laundering and export restrictions, data from banks, insurance companies, distribution partners, and other contractual partners of ours concerning the use or provision of services by you (e.g., payments made), etc.).
- When executing the mandate, we also process personal data that we collect from our correspondence with clients or third parties (in particular opposing parties, authorities, courts, their respective employees, or other contact persons).

Personal data collected in connection with job applications:

We occasionally publish job vacancies (e.g., on our website, on relevant portals, etc.). You can send us your application by post or email. In the context of these applications, and also in the case of unsolicited applications, your application data will be stored and processed by us for the purpose of the application process.

If an employment contract is concluded at the end of the application process, we store the data provided in this context in your personnel file for the purposes of the usual organizational and administrative processes, in compliance with legal requirements.

If an application is rejected, we will delete the data provided within three months of the end of the recruitment process. Data will not be deleted in exceptional cases if it must be retained for a longer period due to legal provisions.

Cookies

On our website, we use "cookies" that enable us to identify your browser or device. A "cookie" is a small text file that is transferred to your computer and stored by your browser when you visit our website. We use two types of cookies on our website:

- Firstly, cookies linked to your session on our website, which are technically necessary for the website to function properly ("session cookies"). These cookies are automatically deleted as soon as you leave our website.
- On the other hand, there are cookies that improve your experience on our website ("functional cookies"). These cookies are deleted after one year. You can refuse the use of these functional cookies via the banner on our website. However, we would like to point out that in this case, you may not be able to use all the features of our website to their full extent.

Social media

We are active on social media and process data about you in this context. We receive data from you, but the platforms may also analyze your use and use data for their own purposes. We currently use

currently use the platform listed below and refer to its privacy policy via the link provided:

- LinkedIn: <https://fr.linkedin.com/legal/privacy-policy>

3 For what purposes do we process your data?

We process your personal data in order to:

- Enter into and perform contractual relationships with you;
- Manage the execution of the mandate entrusted to us;
- communicate with you by any appropriate means of communication in order to answer your questions about our services and offer you our services and assistance;
- plan our commercial activities;
- compile statistics;
- verify that our activities comply with applicable legislation and our internal regulations;
- analyze risks, detect abuse, implement security measures, and monitor the effectiveness of these measures;
- respond to your questions and requests regarding data protection, in particular when you wish to exercise one of your rights under the law;
- control the risks of conflicts of interest;
- comply with any legal obligations we may have in Switzerland.

We do not carry out algorithmic or automated processing of personal data based on profiling.

4 What are the legal bases for processing your data?

Most of the processing we carry out is strictly necessary for the conclusion, execution, and liquidation of **the contract** with you. Without this processing, we cannot guarantee the services we are committed to providing under the contracts.

Other processing is based on our **legitimate interest** or that of a third party. This is particularly the case for processing for marketing, security, statistical, and market research purposes. The same applies to the defense of our interests in court and the management of disputes, in particular those that do not have a contractual basis.

Certain processing may be required by Swiss or foreign law. If not directly required by law, it will be based on our legitimate interest in complying with the **legal provisions** applicable to us.

The use of your personal data for sending our newsletters is based on your **consent**, which can be revoked at any time by sending an email to info@schoebfrote.ch.

5 Who do we share your data with?

Within the framework of the contractual relationship between you and us and for the other purposes mentioned in section 3 above, we may be required to disclose all or part of

of your data to the recipients listed below. These recipients process your data on our behalf, either jointly or under their own responsibility. Where required, we ensure that recipients treat your data confidentially and in accordance with the applicable legal provisions, and that your data is used only for the purposes of providing the relevant service.

- Contractual partners/Service providers. We work with partners to provide you with the services set out in the contracts between us. We therefore only share with them the personal data about you that is absolutely necessary for them to provide their services. These partners provide the following services:
 - Banks;
 - Insurance companies;
 - Real estate agencies;
 - ITThese service providers may act on our instructions as subcontractors, as joint controllers if they work directly with us on certain processing operations, or as independent data controllers if we disclose data to them for processing for their own purposes.
- Tax authorities
- Administrative, criminal, judicial, or arbitration authorities.
- Law firms and entities with which we communicate in connection with the performance of the mandate you entrust to us.

6 Do we transfer your data abroad?

We process personal data in Switzerland. We may also transfer this data to recipients (including clients, opposing parties, or authorities) who in turn process personal data in other countries, even if these countries do not guarantee a level of protection comparable to Swiss law. In the latter case, we will only do so on the basis of consent or standard contractual clauses. The same applies if the transfer of data is essential for the performance of a contract or to assert legal claims.

Data will only be transferred abroad if this is necessary for the performance of the contract and with your consent.

Please note that we use an external IT service provider and a cloud provider with servers in Switzerland.

7 How long do we store your data?

We process your personal data for as long as the purposes of each processing operation require. These purposes include legal retention obligations and retention periods that we have defined ourselves in order to protect our own interests (corporate governance, documentation, and preservation of evidence). In any case, once all retention periods have expired, your personal data will be anonymized or destroyed.

Specific retention periods have been indicated in section 2 above for each category of personal data. However, these periods may be extended for technical reasons when the data in question is stored in our long-term backup system. In this case, we take all security measures to

restrict access to backups to a very limited number of people and to limit data processing to simple storage. We also undertake to irrevocably destroy the data contained in the backups as soon as this is technically possible.

8 How do we protect your data?

The technical, organizational, and legal measures necessary to preserve the security and confidentiality of your personal data are taken based on the risks to you posed by the processing operations and the sensitivity of the data concerned.

We constantly strive to improve these measures in order to protect the security of your personal data.

9 What are your rights regarding the protection of your data?

You have the right to:

- request information from us about your personal data that we process, as well as a copy of said data (right of access);
- ask us to correct or complete incorrect or incomplete data (right of rectification);
- ask us to delete your data if there is no longer a valid reason for processing it (right of erasure);
- ask us to restrict the processing of your data (right to restriction);
- withdraw your consent at any time to the processing of data for which your consent was requested (right of withdrawal);
- notify us at any time of your opposition to the processing of your personal data, unless, for example, a legal basis or our legitimate interest requires or authorizes us to continue processing (right to object).

10 How to exercise your rights?

You can exercise your rights by contacting us directly (see section 1 above). We reserve the right to request additional information to identify you, in particular by means of a copy of a valid official identity document.

To facilitate the processing of your request, we also ask you to specify precisely which right(s) you wish to exercise and their scope.

We will inform you of any conditions or restrictions that may apply to the exercise of your rights.

In order to limit paper waste when you request a copy of your personal data, we will provide it to you in digital format. In addition, please note that under applicable legal provisions, we may ask you to pay a fair fee (maximum CHF 300) if your request requires disproportionate effort. You will be informed of this in advance so that you can decide whether to proceed.

This statement may be updated at any time. The version published on our website is the most recent and authoritative version.

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