

1. Introduction

Vontobel Asset Management AG (“Vontobel”, “us” or “we”) highly appreciates your interest in our products and services. Your privacy is important to us and we want you to feel comfortable when using our products (namely our investment funds, hereinafter “Products”) and our services (including without limitations acquisition or disposal of financial instruments, receipt and transmission of orders in relation to financial instruments, investment advice and portfolio management, hereinafter “Services”).

Personal data is information relating to an individual, which can be used either alone or with other sources of information to identify that individual (including but not limited to data of clients, prospects, website and software applications’ users, service providers, suppliers, vendors or other third parties). Personal data does not include information where the identity of the individual or the specific detail of the information has been removed and is therefore anonymous.

References to “you” or “your” shall mean any individual whose personal data is processed by Vontobel, including but not limited to (i) clients, prospects or investors with direct or indirect relationships (such as those who invest through an intermediary); (ii) beneficial owners of an organization or entity in connection with the provision of our Products or Services; (iii) service providers, third party vendors, IT system providers and (vi) employees, officers, agents (together “Representatives”) of Vontobel and entities specified in the sub-sections (i) – (iii) above.

This privacy policy sets out the personal data collected by Vontobel, the purposes for which personal data is collected and processed, who it may be disclosed to and the rights of individuals in respect of their personal data. This privacy policy (together with our terms and conditions of use for our website, cookie policy, and any other document referred to herein “Privacy Policy”) describes the way we process your personal data when we provide Products and Services to you.

Please note that the privacy policies of affiliates of Vontobel might also apply to you when relevant in respect of your relationship with such affiliates or when applicable to products or services provided to you by such affiliates (e.g. execution only services in the context of a custody account). References to “affiliates” means any entity that directly or indirectly, through one or more intermediaries, is controlled by or is under common control with Vontobel (“Vontobel Affiliates”).

Additional provisions (e.g. App terms of use) may apply to certain kind of data processing (such as marketing and software applications offered by Vontobel, “Apps”) and our social media presence. The corresponding provisions are available on the relevant websites and/or Apps. This Privacy Policy supplements but does not supersede nor replace any other consents you may have previously provided to us in respect of your personal data, and is additional to any rights, which we may have at law to collect, use or disclose your personal data.

2. Categories of personal data and legal basis for processing

Vontobel processes different categories of personal data and it limits its processing of these to a necessary minimum and in accordance with applicable laws. The nature of the information that we collect will depend on our relationship with you. We categorize personal data we process as follows (the personal data listed for each category are non-exhaustive examples):

- Identification and contact data (e.g. name, address, e-mail address, phone number, date of birth, account and contract number, other account information, concluded transactions or third parties, including but not limited to authorized Representatives, consultants and advisors who might also be affected by the data processing, and other data transmitted to us if a person voluntarily completes a registration form or comment field in a newsletter or uses certain services);
- Financial data (e.g. bank account number, annual reports);
- Services data (e.g. data required for risk management, portfolio management, transition and execution of orders).

In limited circumstances, and where allowed by applicable laws, we may collect sensitive information about you (also called “special category data”), e.g. your political affiliations for us to determine whether you are a politically exposed person. Sensitive data includes a number of types of data relating to, e.g. race or ethnic origin, political opinions, religious or other similar beliefs, trade union membership, physical or mental health, sexual life, or criminal records. Vontobel suggests that you do not provide sensitive data of this nature. Should you wish to provide sensitive data for any reason, Vontobel accepts this as your explicit consent to use that data in the way described in this Privacy Policy or as described at the point where you choose to disclose sensitive data. In this respect, your explicit consent will be required in a separate procedure at the point where you choose to disclose such sensitive data.

Where relevant under applicable laws, we process your personal data based on legal grounds which includes (a) the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract; (b) compliance with a legal obligation which Vontobel is subject to and (c) legitimate interests of Vontobel.

3. Sources of personal data

In line with the purposes of paragraph 4, we may collect personal data - to the extent legally permitted - from the following sources, in particular:

- Personal data that is given to us by the data subject, e.g. when requesting or using certain Products and Services, for the onboarding and sales process, for the account opening, for making an enquiry;
- Personal data that is provided to us by an organization or entity that is a client or vendor of Vontobel if you are a Representative of such organization or entity;
- Personal data that is necessary for the facilitation of Products and Services and that is transmitted to us via the technical infrastructure (e.g. via our website, login information, Apps, or collaborations with financial or IT;
- providers or market places and stocks);

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- Personal data from third parties, such as service providers, authorities, sanction lists (e.g. UN, EU, US, UK), World-Check, rating agencies), analytics providers or search information providers as well as Vontobel Affiliates;
 - Personal data that is publicly accessible (e.g. public register information, public social media platforms).

4. Purpose of processing of personal data

We set out below the purposes for which we may process your personal data:

- Processing, improving, managing and executing our Products and Services as well as to updating your personal data;
- Development and assessment of Product and Services, elaboration of statistics, evaluation of business initiatives;
- Entering into and managing your relationship with Vontobel, including performing anti-money laundering, anti-terrorism, sanction screening and other due diligence checks;
- Checking suitability of our clients for certain Products and Services;
- Managing, controlling and monitoring business related decisions, risks and timely processing of business;
- Performing system administration tasks and reporting aggregated statistical information, research, improvement, optimization and further development in connection with Products and Services;
- Fulfilment of our regulatory requirements and respective regulatory requirements of the Vontobel Affiliates;
- Performing compliance, legal and/or regulatory disclosures, notification and reporting obligations to authorities, courts, including but not limited to money laundering, terrorist financing, regulatory audits;
- Complying with internal guidelines of Vontobel Affiliates; complying with contractual terms and conditions which we are bound by;
- Ensuring the security and operation of our IT environment; monitoring the use of our website;
- Facilitating client administration, including responding to your queries or request for information;
- Handling disputes and acting in connection with any claims, actions or proceedings;
- Communicating with you of changes and development to our policies, terms and conditions and other administrative information, including for the purposes of servicing you in relation to Products and Services offered to you;
- Personalizing your experience in relation to your use of our Products and Services and conducting market research, understanding and analysing client behaviour, location, preferences and demographics in order to improve our Services;
- Organizing roadshows, tours, campaigns and promotional events; and
- Matching or aggregating your personal data with other data collected for other purposes and from other sources (including third parties) in connection with the provision or offering of Services.

5. Third parties (including service providers)

In certain cases, Vontobel is bound or reasonably required to fully or partially delegate or outsource certain business areas to our service providers (e.g. trading, execution and settlement of financial

4/6 instruments, administrative and support services in connection with our Products and Services, subscription to and redemption from our Products, printing and dispatch of documents, IT systems and other support or control functions). We might also use such providers for services that are new and have previously not been provided by us.

In connection with one or more purposes set out in section 4 above, we may be required to share your personal data with various third parties, which may include (but are not limited to) the following:

- Vontobel Affiliates;
- service providers, such as brokerage and reporting firms, custodians and administrators, our IT system providers or platforms (including these set up on a cloud) and other support or control functions;
- stock exchanges and clearing houses;
- any supervisory authorities, regulators, tribunals or courts if so directed or if required under any applicable laws (for the avoidance of doubt, such obligations may also exist vis-à-vis authorities of third countries without a direct relationship to you, which, for example, may wish to verify the equal treatment of clients from their country with regard to trading conditions, best execution or fair allocation of securities and profits);
- our data intermediaries and data processors; and or
- our professional advisers such as consultants, auditors, tax advisors, proxy voting agents, legal counsels and law firms and other service providers.

6. Disclosure and cross-border transfer of personal data

To provide our Products and Services to you and in the course of performance of our business, we may disclose and transfer your personal data for the purposes set out in this Privacy Policy to third parties, as specified in Section 5 above, in a location outside of the country where you are domiciled or where Vontobel Services are provided to you. Although the country to which personal data may be transferred may not have the same level of privacy and data protection laws, we apply the same level of security and organizational controls to the processing of personal data wherever it is processed. We carefully select our third party service providers and require them by contract to process personal data on our behalf in compliance with Vontobel's criteria for personal data processing.

If we transfer personal data outside of the EEA, we ensure a similar level of protection for your personal data by ensuring the country to which the personal data is transferred is considered by the EU Commission to provide an adequate level of protection, putting in place contractual clauses the EU Commission consider to provide the same level of protection.

Certain countries may have more stringent data protection laws, which may not allow your non-anonymous personal data to be used in these countries to the extent described above. Such provisions may preclude, for example, the collection of additional personal data based on the provided information or the disclosure of your personal data to other parties or companies.

7. Transfer of data via the internet

Please be advised that data transferred across national borders over the internet may not be subject to any control while in transit even if the sender and recipient are both located in the same country.

5/6 We cannot guarantee the security of data transferred over the internet and accept no liability in respect thereof. In using our website, Apps or accessing our Products or Services, it may allow third parties (e.g. app stores, network providers or the manufacturer of your device), wherever they are located, to access and process your data. Open networks are beyond Vontobel's control and can therefore not be regarded as a secure environment. Any transmission of data via such open network cannot be guaranteed to be secure or error-free as data may be intercepted, amended, corrupted, lost, destroyed, arrive late or incomplete, contain viruses or may be monitored. In particular, data sent via an open network may leave the country – even where both sender and recipient are in the same country – and may be transmitted to and potentially processed in third-party countries, where data protection requirements may be lower than in your country of residence.

Where data is transmitted via an open network, we cannot be held responsible for the protection of this data and we accept no responsibility or liability for the security of your data during transmission. We, therefore, recommend avoiding the transmission of any strictly confidential information via open networks.

Any notices emailed to us by you may not be secure. If you email any confidential information to us, you do so at your own risk. When contacting us, please send data via a secure mechanism, where appropriate, instead of over the internet.

The sender and recipient can still be identified even when the information transmitted is encrypted. As a result, a third party could inadvertently or otherwise infer that there is a commercial relationship between you and Vontobel. Therefore, we recommend avoiding the transmission of any confidential information via open networks.

8. Retention period

Even though the retention period for personal data depends on statutory retention provisions as well as on the applicable justification basis and the purpose of the data processing, Vontobel will only store your personal data for as long as necessary, taking into account our obligation to respond to requests or resolve problems, to provide improved and new services and to act in accordance with applicable laws. In order to meet our professional and legal requirements, to establish, exercise or defend our legal rights, and for archiving and historical purposes, we need to retain information for a reasonable period of time. If the personal data we collect is no longer needed in this way, we are obliged to delete it in a secure manner.

9. Data subject rights

To the extent provided under applicable laws, you have a right to be informed whether personal data in relation to you is being processed by us. On request, and where required under applicable laws, we will disclose to you the personal data in our databases, including available details about the origin of the data, the purpose and, where appropriate, the legal basis for the processing and the categories of the processed personal data, the parties involved in the data collection and the data recipients. If permitted under applicable laws, we may charge you reasonable fees for the access request.

You may withdraw your consent to the process of your personal data and/or may wish to opt out of the use of your information for advertising or marketing purposes at any time with future effect. You

6/6 can exercise further rights, where provided for under applicable laws, such as the right of rectification and you are also entitled to have any inaccuracies in your personal data corrected, or to have your data blocked or deleted, depending on the lawful basis under which we are holding particular data.

Please let us also know, if we do not meet your expectations with respect to the processing of personal data or you wish to complain about our data protection practices; this gives us the opportunity to examine your issue and make improvements, where necessary.

In any of these cases, please send us a clear request in writing to dpo.ch@vontobel.com or by using the request form provided on our website, containing a detailed, accurate description of the concerned data and your specific request you want access to. If there are reasonable doubts regarding your identity, we might ask you to prove your identity (e.g. with a clearly legible copy of a valid official identification document so we can be sure as to your identity). We will acknowledge receipt as soon as received, examine your issue and reply in good time. If a full response will extend beyond one month, taking into account the complexity and number of the requests, we will advise you of this.

10. Changes to the Privacy Policy

We reserve the right to amend this Privacy Policy without giving prior notification. We therefore advise you to check our Privacy Policy on our website on a regular basis.