

Client privacy notice

How we protect your personal information at Vontobel Swiss Financial Advisers

Vontobel Swiss Financial Advisers AG (Vontobel SFA) takes important steps to help safeguard the personal information (personal data) we collect about our clients. This Client Privacy Notice describes the personal information we collect and how we handle and protect that information in line with applicable United States law and regulatory requirements. This Client Privacy Notice applies to current and former clients.

| FACTS | WHAT DOES VONTOBEL SFA DO WITH YOUR PERSONAL INFORMATION |
|--------------|--|
| Why? | Financial companies choose how they share your personal information. US Federal law gives consumers the right to limit some but not all sharing, and also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do. |
| What? | The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> - Contact and identifying information (e.g. Social Security number, date of birth, and address) - Income and risk profile, terms of contract, and type of business concluded - Transaction history, including beneficiaries and details of traded securities Account balances and assets When you are no longer our customer, we continue to share your information as described in this notice. |
| How? | All financial companies need to share their customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share customers' personal information; the reasons Vontobel SFA chooses to share; and whether you can limit this sharing. |

| REASONS WE CAN SHARE | DOES VONTOBEL SFA SHARE? | CAN YOU LIMIT THIS SHARING? |
|---|--------------------------|-----------------------------|
| For our everyday business purposes Such as to process your transactions, maintain your account(s), applicable regulatory reporting, respond to court orders and legal investigations, or other additional services you have signed up for (e.g. tax reclaim services) | Yes | No |
| For our marketing purposes To offer our products and services to you | No | n/a |
| For joint marketing with other financial companies | No | n/a |
| For our affiliates' everyday business purposes Information about your transactions, experiences, and creditworthiness | No | n/a |
| For non-affiliates to market to you | No | n/a |

WHO WE ARE?

| | |
|---|---|
| Who is providing this notice? | Vontobel SFA |
| What we do | To protect your personal information from unauthorized access and use, we use security measures that comply with both Swiss and US federal laws |
| How do we protect your personal information? | We collect your personal information, for example, when you: <ul style="list-style-type: none"> - sharing for affiliates' everyday business purposes—information about your creditworthiness - affiliates from using your information to market to you - sharing for non-affiliates to market to you |

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

How can you limit sharing

US Federal law gives you the right to limit only:

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

Note: As Vontobel SFA does not share any of the above-referenced information, there is no need to limit sharing.

DEFINITION

Affiliates

Companies related by common ownership or control. They can be financial and non-financial companies. Vontobel SFA's affiliates generally include companies with a Vontobel name.

Non-affiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

Joint marketing

A formal agreement
