

## DATA PRIVACY NOTICE

The purpose of this Data Privacy Notice (hereinafter referred to as the "Notice") is to inform data subjects about how we collect, store and process data (hereinafter referred to as the "Subjects").

### 1. Entity Responsible for Processing and Principles

The responsible entity for processing, Climber Capital SA, a Swiss limited company with its registered office at 15, Grand-Rue, 1260 Nyon, and whose IDE number is CHE-268.729.084 (hereinafter referred to as "CCSA"), recognizes the importance of keeping the personal data of its customers confidential and protecting their privacy rights. Regarding its activities and the data collected by it, CCSA intends to apply the most restrictive principles and standards that are identifiable with respect to the protection of personal data.

Consequently, all personal data and information (hereinafter referred to as "Data") provided in connection with our services will be processed lawfully, fairly, transparently and confidentially by CCSA.

### 2. Consent

By contracting the services offered by CCSA (hereinafter referred to as the "Services"), and in accordance with the legal provisions in force, you acknowledge and agree that, in connection with our Services, Data are or will be collected by CCSA. The Data will be collected and used solely for the purposes of the Services offered by CCSA or any subsequent contractual relationship with CCSA.

Therefore, entering into an engagement with CCSA means that you agree to the collection, processing of Data and agree to this Notice.

### 3. Legal Basis and Purposes of Data Collection and Processing

#### 3.1. Legal Basis

The Subject concerned acknowledges that the collection and processing of Data by CCSA is necessary for the fulfilment of the mandate (in particular, Discretionary Asset Management or Advisory Services Mandate) entrusted to CCSA to which the Subject concerned is a party in connection with the Services, but also for the preservation of the legitimate interests of CCSA and for the fulfilment of legal obligations incumbent upon CCSA.

#### 3.2. Purposes

The Data are collected and processed by CCSA for the following purposes (hereinafter referred to as "Purposes"):

- The opening and maintaining of the contractual relationship with the Subject or the beginning of a business relationship with CCSA (hereinafter referred to as a "Business Relationship"), including all formalities relating to the identification of the Subject and of any person or entity over whom the Subject or a third party provides information and / or of which CCSA has knowledge in any other way in connection with the Business Relationship (hereinafter referred to as a "Related person").
- Any other related services provided by CCSA's service providers and subcontractors in a Business Relationship.
- The management, administration, placement and distribution of financial products, including all services related to these activities.
- Compliance with legal and regulatory obligations to which CCSA is subject under regulations applicable to Swiss financial intermediaries.

- CCSA Customer Management: CCSA's customer administration, invoicing services, marketing (newsletters, event invitations, etc.) and others.

## 4. What Data are Collected?

### 4.1. Types of Data

As part of the Services, CCSA collects the following data (contemplative, non-exhaustive list) from its counterparties (customers, administrators of private equity vehicles, lawyers, banks, other financial intermediaries):

- Identification data: personal identification data (name, surname, title, tax identification number) and structural identification data (information relating to investment entities).
- Identification data issued by public authorities and other registers: identity cards, passports, certificate of incorporation, articles of association, share registers.
- Location data: personal and business addresses of investment entities.
- Communication and electronic identification data (personal and business): telephone number, e-mail address.
- Financial data: identification number and bank account numbers, financial means / assets, financial transactions.

### 4.2. Information Collected Directly from Subjects

CCSA collects and records all information provided to it in connection with the Services or by any other means in its Customer Relationship Management (CRM) system. The Subject may choose not to provide CCSA with certain information, however this decision may have the effect of depriving the Subject of certain Services or features offered in connection with the Services.

### 4.3. Information Collected from Third Parties - Subcontractors

As part of its Services, CCSA may also collect data from third parties (administrators of private equity vehicles, lawyers, banks, other financial intermediaries, list of international sanctions, information available to the public (e.g. World-Check)). Data collected from third parties is treated in the same way as Data collected directly from the Subjects (see paragraph 4.2 above).

CCSA may be considered as a processor of personal data in the context of information collected from third parties, according to the applicable regulations. Should this be the case, CCSA will enter into a subcontracting agreement with the third parties concerned to ensure compliance with the present Notice.

## 5. Methods of Data Processing

The Data is processed by CCSA or by third parties selected on the basis of their reliability and competence, as well as by duly appointed data controllers - solely for the purpose of carrying out the purposes specified in paragraph 3.2 above, mainly by means of computer tools, but also on paper.

CCSA retains the Data for as long as necessary for the fulfilment of the Purposes for which it was collected and in accordance with the regulations applicable to the Services (for example, currently ten years in connection with banking services).

## 6. Profiling

CCSA may evaluate certain characteristics of the Subjects and Related Persons on the basis of automatically processed Data in order, in particular, to make personalized offers and advice or information about its Services.

CCSA may also use technologies to identify the level of risk associated with a particular Subject or Business Relation activity.

In contrast, CCSA does not use automated decision making in relation to a Business Relationship, a Subject, or a Related Person.

## 7. Access to Data and Data Transfers

The Data transmitted to CCSA will be known and used by CCSA employees and/or its subsidiaries (national or foreign) for the sole purpose of performing the Services that constitute the purpose for which the Data was collected.

CCSA does not sell or rent the Data to any third party.

Finally, CCSA may have to share personal data:

- To put the needed Service to the Subjects disposal;
- Where permitted or required by law to comply with a valid legal process;
- To protect and defend CCSA's rights or property, including the security of its products and services;
- To protect the personal safety, property or other rights of the public, CCSA or its customers or employees; or
- In connection with the sale of all or part of CCSA's operations.

If CCSA is required by law to disclose the Data to third parties, CCSA will take all commercially reasonable steps to notify you in advance, unless otherwise required by law. If CCSA engages in a process of merging, acquiring or selling assets, CCSA will comply with this Notice.

## 8. Privacy, Security and Data Protection

CCSA undertakes to ensure that there are adequate levels of protection of Data, in particular those relating to professional secrecy and Data protection.

## 9. Rights of the Subjects

In accordance with the applicable regulations, Subjects may exercise the following rights with respect to their data in connection with the processing of Data:

- Right to request access to stored data;
- Right to request the rectification of stored data;
- Right to request the deletion of stored data, subject to the applicable legal provisions on data retention;
- Right to request a limitation of the processing of stored data, subject to the applicable legal provisions regarding the processing of data; and
- Right to request a prohibition on the processing of stored data, subject to the applicable legal provisions regarding the processing of data.

Even if a Subject contests the processing of its Data, CCSA is entitled to continue such processing if it is (i) legally binding, (ii) necessary for the performance of the Contract to which the Subject is party, (iii) necessary for the performance of a public interest mission or (iv) necessary for the legitimate interests that CCSA pursues, including the finding, exercise or defense of a right in justice.

Generally speaking, the Subject has the right to require CCSA to protect their data. CCSA works tirelessly to protect itself and its users from unauthorized access, alteration, disclosure or destruction of information that is held. More specifically:

- CCSA respects this Notice in all circumstances with respect to all Data that CCSA collects about the Subject concerned;
- CCSA limits the use and disclosure of Data and ensures that anyone with whom CCSA shares this information will treat it with the confidentiality and security it deserves; and
- CCSA has implemented physical, technical and administrative procedures to protect the information collected.

The exercise of any right set forth in the paragraph shall be carried out in accordance with the communication provisions of paragraph 10 (Communication and Remarks) below.

## 10. Communication and Remarks

If you have any questions about CCSA data protection, a detailed message can be sent to [info@climbercapital.ch](mailto:info@climbercapital.ch) or by mail to Climber Capital, Grand-Rue 15, 1260 Nyon, Switzerland and CCSA will address them as soon as possible.

You may exercise any of your rights related to Personal Data (paragraph 9) by sending your request to the aforementioned address.

CCSA's business is constantly evolving and this Notice and the Terms of Service may change. Unless otherwise stated, our Notice applies to the use of all information collected about any Subject.