

Data Protection

Eagle Wealth Management Ltd takes data privacy seriously and adheres to high data protection standards as well as transparency of personal data collection and processing for our contracting parties. We comply with applicable data protection regulations, the Swiss Federal Act on Data Protection (FADP and ordinance, hereinafter referred to as Data Protection Legislation). The terms "personal data", "data subject", "controller", "processor" and "processing" shall have the meanings given to them in the Data Protection Legislation.

Herewith below, we stipulate the key aspects of personal data processing and our obligations towards individuals (e.g. contracting parties, its related persons such as authorized persons, partners, advisors, beneficial owner(s) / beneficiary(-ies), etc.: hereinafter altogether referred to as **data subject**), whose personal data Eagle Wealth Management Ltd (controller) may control and process, and their rights.

Personal data is any information relating to an identified or identifiable natural person (for example a name, contact details, date of birth et al). Processing includes any handling of such personal data via storing, disclosing, collecting, deleting, modifying, correcting et al.

1 Processing of personal data

Within the framework of the provision of the services rendered by Eagle Wealth Management Ltd, we may be required to obtain from the Contracting Party personal data of a data subject. Depending on the service provided by Eagle Wealth Management Ltd, the following personal data may be collected and/or processed (non-exhaustive list):

- personal details such as name, identification number, date of birth, KYC information and documents (including copies of identification documents (Identity cards and / or passport), phone number, any kind of address details, family related information (e.g. name of the spouse, children, partner or relatives));
- financial information, including payment and transaction records and information relating to bankable and non - bankable assets, financial statements, liabilities, taxes, revenues, earnings and investments (including Investment objectives);
- tax domicile and other tax-related documents and information;
- professional information, such as job title and work experience (CV related information);
- information related to knowledge of and experience in investment matters;
- identifiers such as assigned Contracting Party file IDs and/or account numbers;
- by accessing www.eagle-wm.ch, please consult our "privacy & cookies policy disclaimer under <https://eagle-wm.ch/legal-regulation/> disclosing what data is being collected by accessing.
- If you click on any third-party webpage link on our webpage and are redirected to the corresponding webpage of the third party, the third party's privacy policy comes into effect, which is not under our control. We disclaim any responsibility for such webpages or web services.

and any other information required to be obtained under the applicable laws (hereinafter altogether referred to as **personal data**).

In some cases, we collect personal data from public sources (e.g., official company register, press, and the internet) or third parties, such as due diligence service providers (e.g. name checking data bases) as well as all data provided by you.

Eagle Wealth Management Ltd limits the type and amount of personal data collected to the level required for the provisions of its services and in line with its obligations.

2 Legal basis for and purpose of processing of personal data

Eagle Wealth Management Ltd always processes personal data for a specific purpose. Such as to meet:

a) Contractual obligations

Personal data is processed to offer and to provide financial intermediary services such as portfolio management, Investment advisory, Investment reporting, private office, etc. or pre-contractual clarifications (hereinafter altogether "services").

b) Legitimate interests

Where required, personal data is processed for legitimate interests pursued by Eagle Wealth Management Ltd or a third party, due to statutory provisions or in the public interest such as:

- providing and developing Investment products, services and websites, apps and other platforms, on which

Eagle Wealth Management Ltd is active;

- communication with third parties and processing of their requests (e.g., job applications, media inquiries);
 - meeting regulatory and other compliance obligations (laws applicable to financial service providers (e.g., anti-money-laundering, record keeping and/or monitoring reasons), disclosure obligations towards tax authorities, regulators, other authorities and administrative bodies;
 - valuation and enhancement of IT security and IT operation;
 - risk control and security reasons of contracting parties, employees, and shareholders of Eagle Wealth Management Ltd.
 - advertisement and marketing (including organizing events), provided that the Contracting Party has not objected to the use of its personal data for this purpose. As a Contracting Party you may object at any time to further receive advertisement or marketing material. In such case Eagle Wealth Management Ltd will refrain from sending such to the corresponding Contracting Party;
- c) legal reasons
- asserting legal claims and defence in legal disputes and official proceedings;
 - prevention and investigation of criminal offences and other misconduct (e.g. conducting internal investigations, data analysis to combat fraud); and
 - acquisition, sale of business divisions, companies or parts of companies, other corporate transactions, the transfer of personal data related thereto or as measures for business management or compliance with legal and regulatory obligations including internal regulations of Eagle Wealth Management Ltd.

If a Contracting Party has given consent to Eagle Wealth Management Ltd to process its personal data for certain purposes. Eagle Wealth Management Ltd will process the Contracting Party's personal data within the scope of and based on this consent, unless Eagle Wealth Management Ltd can rely on another legal basis to do so. Consent given can be withdrawn at any time. Such, however, will not affect data already processed prior to the withdrawal.

3 Personal data transfer and sharing

Eagle Wealth Management Ltd shares personal data internally, with external service providers, authorities during a business relationship, or in case legal, regulatory or market practice requires such. This may affect the transfer of personal data to third parties in Switzerland or abroad for the processing, storing, retention, printing, evaluation, management, etc. of personal data. Thereto, Eagle Wealth Management Ltd may share personal data with:

- a) Third parties
When providing services, Eagle Wealth Management Ltd may share personal data with third parties: e.g. payment recipients, beneficiaries, account nominees, intermediaries, banks, correspondent and agent banks, stock exchanges and other financial institutions (non-exhaustive list).
- b) Authorities/administrative bodies
Eagle Wealth Management Ltd may disclose personal data to supervisory- authorities, auditors, authorities, regulators, or administrative bodies, when required to do so by law or regulation, or based on a court/administrative order.
- c) External service providers
Eagle Wealth Management Ltd may transfer personal data to service providers and agents appointed by Eagle Wealth Management Ltd for a specific purpose: e.g. to provide banking, IT, accounting, logistic and/or telecommunication services.

Such service providers may be located also outside of Switzerland and in countries which are, according to the Data Protection Legislation, not providing for an 'adequate level of data protection' (e.g. USA). When transferring personal data within Switzerland or abroad, Eagle Wealth Management Ltd ensures that service providers will adhere to the applicable laws and regulations to the extent possible and that an adequate level of data protection is provided. The latter will be safeguarded by concluding standard contractual clauses (SCC) that have been approved by the competent authority with the recipient of personal data (service provider) and (if required) by taking appropriate measures to ensure that the recipient complies with such.

An exception may apply e.g. in case of legal proceedings abroad, but also in cases of overriding public interest **or if the performance of a contract requires disclosure, if the Contracting Party has given consent** or if data has been made generally accessible by the Contracting Party as it has not objected.

4 How long will personal data be stored?

Eagle Wealth Management Ltd will only retain personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory, or contractual requirements. Eagle Wealth Management Ltd applies criteria to determine the appropriate periods for retention of personal data depending on its purpose (e.g. account maintenance, facilitating client relationship management, responding to legal claims and/or regulatory requests). In general, Eagle Wealth Management Ltd retains personal data for the entire duration of a business relationship plus 10 years since its termination. A longer retention period might be required in case of an ongoing legal and/or regulatory proceeding.

5 Rights of the data subject

The data subject has the right to get access and obtain information about the purpose for which personal data is processed, stored and to obtain information about recipients with whom Eagle Wealth Management Ltd shares/has shared personal data.

The data subject has the right to ask Eagle Wealth Management Ltd to rectify inaccurate personal data collected and to request restriction of personal data processing, while such a request is pending.

The data subject has the right to ask Eagle Wealth Management Ltd to stop processing his/her personal data, or to request erasure of its personal data. These rights, however, are not determined, as there might be overruling interests (e.g. ongoing legal proceeding or safeguarding the ability to comply with legal requirements) that require the processing of personal data to be continued.

The data subject may have the right under the applicable data protection law to request from Eagle Wealth Management Ltd that all his/her personal data which was processed will be transferred to the data subject or to a specified other data controller of his/her choice.

6 Profiling and automated individual decision making

Eagle Wealth Management Ltd may partially process personal data automatically with the aim of evaluating certain personal aspects (profiling). Profiling allows to more accurately inform and advise the Contracting Party about products or services. For this purpose, Eagle Wealth Management Ltd may use evaluation tools which facilitate the communication with the Contracting Party, for advertisement, market or opinion research, as may be required.

In establishing and carrying out a business relationship, Eagle Wealth Management Ltd generally does not use any fully automated individual decision-making tools (such as acc. to article 21 FADP). Should Eagle Wealth Management Ltd use such in certain cases, the Contracting Party will be informed accordingly.

7 Exercising rights and complaints

In case a data subject is not satisfied with any aspect of the processing of his/her personal data by Eagle Wealth Management Ltd, the data subject can contact Eagle Wealth Management Ltd (responsible person; M. Bleuler) at:

info@eagle-wm.ch

or:

Eagle Wealth Management Ltd

Weinplatz 10
8001 Zurich
Switzerland
T: +41 43 888 75 00

In case Eagle Wealth Management Ltd's response is not satisfactory, the data subject may file a complaint to the data protection authority in the jurisdiction of his/her domicile or in the jurisdiction where the data subject believes an issue in relation to his/her personal data has arisen.

8 Security

Eagle Wealth Management Ltd ensures an appropriate level of security while processing personal data. Thereto, we have appropriate technical and organisational measures in place to prevent unauthorised or unlawful access to personal data provided. Appropriate measures include (non-exhaustive list) the issuance of directives, training, IT & network security solutions, access controls, encryption of data and transmission. However, complete data security cannot be guaranteed. Namely not for communication via e-mail, instant messaging, chats, social media, video conferencing systems and similar means of communication. Encryption is recommended to communicate with us. We aim at electronic communication encrypted as far as possible.

9 Further information

Eagle Wealth Management Ltd processes personal data both in its role as a data controller and a data processor, lawfully, fairly, and considering the legitimate purpose for which it is collected.

Eagle Wealth Management Ltd is committed to keep personal data accurate and up to date. Therefore, in case personal data changes, please keep us informed of any changes as soon as possible.

10 Status

This privacy notice has been updated in August 2023. It is a notice explaining what Eagle Wealth Management Ltd does, rather than a document that binds Eagle Wealth Management Ltd or any other party contractually. Eagle Wealth Management Ltd reserves the right to amend it from time to time. If the notice has been updated, Eagle Wealth Management Ltd will take steps to inform the Contracting Party of the update by appropriate means (including by publishing an updated version on its webpage), depending on how Eagle Wealth Management Ltd normally communicates with the Contracting Party.

Eagle Wealth Management Ltd

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