

Privacy notice of Kuoni Mueller & Partner Ltd. for clients and business partners

The following information is intended to provide you with an overview of how your personal data is processed by Kuoni Mueller & Partner Ltd. ("KM&P", "we" or "us"), as the controller of the personal data. It also outlines your rights under the data protection legislation. Herein we refer to 'you' as a client, a business partner, or a prospect of us. The term 'business partners' includes persons related to a client, such as employees, family relatives, authorised signatories, agents, and/or representatives.

1. Contact details

Kuoni Mueller & Partner AG
Data Protection
Schweizergasse 21
8001 Zürich
Switzerland
info@kmp.ch

2. Which personal data is collected and processed by KM&P?

KM&P collects and processes personal data that it receives from you and that it generates as part of the business relationship with you. Personal data includes data that directly identifies you as an individual (e.g. name, address, telephone number) or that allows for identification when used in connection with other information. In addition to personal data received directly from you, KM&P may also collect and process personal data about you from public sources (e.g. the internet, social media, debtor directories, land registers, tra-

de, and association registers) or data it receives from other Julius Baer Group companies or third parties.

KM&P collects and processes the following personal data in particular:

- personal details and identification data (e.g. name, address, contact data, date and place of birth, nationality, passport, ID documents, personal situation, occupation, interests and preferences, business connections);
- authentication data (e.g. specimen signature);
- personal data arising from the preparation, execution, and performance of contracts and the fulfilment of obligations, particularly in relation to our services;
- advertising and sales data;
- personal data relating to contacts (e.g. correspondence, inquiries, minutes of consultation, contact notes);
- account details, recordkeeping data, information regarding your personal background and financial situation (e.g. information relating to compliance and/or regulations and/or company-related data (such as its business activities, purpose, ownership and organisational structure, and number of employees));
- sensitive personal data, such as biometric data; information regarding religious, ideological, or political views or activities; information relating to health; and information on convictions or sanctions under administrative

or criminal law;

- personal data regarding related third parties such as employees, family relatives, authorised signatories, agents, and/or representatives;
- personal data that is transmitted and automatically collected during the use of websites, mobile applications, or other electronic services provided by KM&P (electronic services). This data includes date and time of access, name of files downloaded, as well as the amount of data transmitted and the access result, your web browser, the browser language, and the requesting domain and IP address;
- other personal data comparable to the categories outlined above.

3. For what purpose and on what legal basis does KM&P use your personal data?

a) To fulfil contractual obligations or take steps prior to entering into a contract

The processing of your personal data allows KM&P to provide you with the contractually agreed services, to perform contracts with you, and to take steps prior to entering into a contract. Data processing is primarily driven by services requested by you (e.g. real estate sales and renting, real estate management, real estate valuations, strategy and consulting, portfolio and asset management). KM&P uses your personal data, among other purposes, for identification purposes, to verify documents; to provide advice, to support the execution of requests and services; as well as to settle contractual relationships.

b) On the basis of regulatory requirements and legal obligations

The activities of KM&P and of other Julius Baer Group companies are subject to various Swiss and foreign laws and regulations (e.g. tax laws, statutory laws, etc.). The processing of personal data is used, among other things,

for the verification of creditworthiness, identity, and age; prevention of fraud; compliance; the fulfilment of tax-related, monitoring, and reporting obligations; as well as the assessment, investigation, analysis and the management of risks by KM&P and other Julius Baer Group companies.

c) To pursue and protect legitimate interests of KM&P

To pursue and protect its legitimate interests, KM&P will also process your personal data for the following purposes (examples):

- communication with you in relation to your inquiries or your potential interests, or to inform you about the offerings of KM&P and of other Julius Baer Group companies;
- initiation of a business relationship and contact;
- prevention and investigation of breaches of contract, criminal acts, and other non-compliance issues;
- identification and analysis of your potential needs, and optimisation of the client contact;
- risk management within KM&P and Julius Baer Group companies;
- assertion of rights and legal claims, and defence in legal disputes, e.g. in relation to tax, civil, criminal, or administrative claims or attachments on deposited assets;
- managerial oversight, consolidation, and maintenance of data relating to you that KM&P and Julius Baer Group companies process (single-client view);
- consultation and exchange of data by or with information agencies (e.g. debt collection registers, creditrating agencies, land registries) for determination of creditworthiness or default risks;
- business development, advertising, marketing, market research, or surveys;

- safeguarding of KM&P's IT security and IT operations;
- outsourcing KM&P functions and services to Julius Baer Group companies, or to service providers and agents appointed by KM&P;
- video surveillance for security purposes;
- measures to ensure the security of buildings and systems (e.g. entry controls).

d) On the basis of your consent

In particular cases, your consent is requested for the processing of your personal data. Provided your consent has been obtained, KM&P may process personal data for the specific purposes where indicated. You may withdraw your consent at any time. Please note that the withdrawal of consent has no retroactive effect on the processing of your personal data.

e) Recording and storage of communication

KM&P records and retains

- metadata of phone calls such as phone numbers, time, and duration; and
- electronic communication (e-mails, chat messages, etc.).

The communication retained by KM&P as set out above may be reviewed and used for security and evidence purposes (e.g. evidence of instructions received, advice given, compliance with legal and regulatory requirements).

4 Who can access your personal data?

a) Disclosure to other Julius Baer Group companies

KM&P may disclose personal data to other Julius Baer Group companies, which may process such data in particular for the purpose of performing tasks and services relating to their business relationship with you, for the purpose of international supervision and oversight,

investigations, and for risk management and compliance.

b) Disclosure to business partners and other third parties

KM&P may disclose personal data to contractual partners and other third parties, as this is deemed necessary, e.g. for efficiency gains or internal management purposes, and/or for the performance of the contract with you.

Recipients may include, among others, their reporting offices, brokers, regulatory bodies or any other authorities

c) Disclosure to Group internal and third party service providers

KM&P may disclose personal data to other Julius Baer Group companies and to third party service providers and their subcontractors (Service Providers) retained to provide services for KM&P, or to which it outsources functions and business areas of KM&P. The relevant services or functions may concern in particular the following areas: IT services (e.g. data hosting and processing; IT development, support, operation); the use of internet based services (e.g. online commercial register); the processing of transactions and services; asset management services and ancillary activities; compliance and risk management functions; accounting (financial accounting and controlling); marketing and sales related activities; reporting, logistics, printing services, debt collection, as well as other back and middle office activities. Where the Service Providers have access to your personal data, KM&P requires them to comply with appropriate confidentiality, data protection, and data security requirements.

d) Disclosure to authorities and courts

Where required by law or regulation, or necessary to protect its legitimate rights and interests, KM&P may disclose your personal data to

third parties. This may, among others, include public bodies and institutions (e.g. financial or law enforcement authorities, supervisory authorities, courts, or other competent bodies).

5 Does KM&P transfer personal data across borders?

KM&P may disclose personal data to recipients outside of Switzerland, including to jurisdictions where Julius Baer Group companies are established or located (see www.juliusbaer.com/en/aboutus/ourlocations), or to other jurisdictions, including the EU/EEA member states and countries with an adequate level of data protection as specified by the European Commission, or other jurisdictions around the world where any of the third parties are located or where KM&P provides services.

The specific countries where the recipient of your personal data are located may vary as they correspond with the applicable services and the respective purpose(s) defined in this privacy notice.

Recipients of personal data may potentially forward the information to their branches or Group entities, Service Providers, or to other market participants or authorities within and/or outside of their jurisdiction.

Individual countries to which KM&P transfers your personal data may potentially not have laws that afford the same degree of protection to personal data as in Switzerland. In these cases, KM&P will generally ensure an adequate level of data protection by e.g. contractual, organisational, and technical measures. These include agreements that have been approved by the European Commission as well as the Swiss Federal Data Protection and Information Commissioner (FDPIC), known as standard contractual clauses.

6 How long will your personal data be stored?

KM&P processes and retains your personal data for as long as it is required for the specific purpose for which it was collected, or to comply with legal or regulatory requirements. If your personal data is no longer required for said purposes, KM&P might still retain and process your personal data based on your consent, if required by applicable laws or regulations, or for further processing. Examples for this would be:

- the fulfilment of retention obligations under applicable law;
- the fulfilment of specific regulations that require KM&P to retain the data;
- for compliance or risk management in accordance with applicable laws;
- the exercise of KM&P's rights in relation to claims and any type of legal or regulatory action; or
- if it is in KM&P's legitimate interest.

7 What are your rights under data protection law?

The applicable data protection legislation grants you the following rights:

- to request that information on personal data held on record by KM&P be shared with you;
- to demand that information be rectified should it be incorrect;
- to ask that your personal data be deleted if KM&P is not permitted or is not legally obliged to retain the personal data;
- to demand that the processing of your personal data shall be restricted if
 - you have disputed its accuracy, for the duration needed to verify the accuracy of your personal data, or

- its processing may lack a legal basis and you prefer a restriction of processing to the deletion of your personal data;

- to object to the processing by KM&P if
 - KM&P only processes personal data based on its legitimate interests – in this case, it will cease the processing unless this is outweighed by its own interests or it needs to process the data in order to exercise its rights, or
 - the processing is based on your consent (e.g. for direct marketing);
- to demand that your personal data which you have provided to KM&P be transferred to a third party indicated by you in a generally useable, machine readable, and conventional format;
- to demand that an individual automated decision be reviewed by a natural person. You also have the right to state your view.

You also have a right of appeal (as far as this affects you) to the respective data protection supervisory authority.

8 What personal data are you required to supply?

KM&P requires you to provide the personal data necessary for the acceptance and execution of a business relationship and for the fulfilment of the associated contractual and/or legal obligations. Unless it obtains these data from you, KM&P will most likely be unable to enter into a contractual relationship with you and/or provide the agreed services.

If this information changes during the business relationship, you are obliged to notify KM&P without delay. If you do not provide KM&P with the necessary information, it will not be able to commence or continue a business relationship with you.

9 Does KM&P use automated decision-making?

As a basic principle, KM&P does not use fully automated decision-making for commencing and conducting its business relationships. If KM&P does apply this procedure in exceptional cases, it will inform you accordingly where this is a statutory requirement.

10 Is your data processed automatically and used for profiling?

KM&P may process your personal data automatically in certain areas with the aim of evaluating certain personal criteria. KM&P may use your personal data for profiling. Profiling is any type of automated processing of personal data. This consists of using the personal data to evaluate certain personal aspects relating to you, in particular to analyse or predict aspects concerning the economic situation, personal preferences, interests, reliability, behaviour, and location or change of location. KM&P may use, process, and combine publicly available data as well as third-party data about you for this purpose. Profiling may take place, for example, in the following cases:

- to comply with the legal and regulatory obligations of KM&P, Julius Baer Group companies, or Service Providers and agents engaged by KM&P;
- to check the client relationship regarding compliance with applicable laws and regulations;
- in order for KM&P to use assessment tools to provide you with relevant and appropriate information on its products and services. This enables it to carry out demand-based communication and advertising, including market and opinion research.

11 Where can you find the KM&P's current privacy notice?

KM&P reserves the right to amend this privacy notice from time to time and will inform you of such an amendment in an appropriate manner.

12 How can you contact KM&P?

Should you have any questions about the treatment of your personal data, please contact us by using the contact details as provided in section 1.

Zurich, February 2024