

FACTS**WHAT DOES SSA Swiss Advisors AG ("SSA") DO WITH YOUR PERSONAL INFORMATION?**

Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law 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"> ■ Social Security number and assets ■ investment experience and transfer instructions ■ account balances and account and credit history
How?	All financial companies need to share client personal information to run their everyday business. In the section below, we list the reasons financial companies can share their client personal information; the reasons SSA chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does SSA share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	YES	YES
For our marketing purposes— to offer our products and services to you	NO	We don't share
For joint marketing with other financial companies	NO	We don't share
For our affiliates' everyday business purposes— information about your transactions and experiences	NO	We don't share
For our affiliates' everyday business purposes— information about your creditworthiness	NO	We don't share
For our affiliates to market to you	NO	We don't share
For nonaffiliates to market to you	NO	We don't share

To limit our sharing	<ul style="list-style-type: none"> ■ Call +41442066040 —our menu will prompt you through your choice(s) ■ Visit us online: www.ssa-wa.com <p>Please note:</p> <p>If you are a <i>new</i> customer, we can begin sharing your information 1 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
-----------------------------	---

Questions?	Call number above or go to info@ssa-wa.com
-------------------	---

Who we are

Who is providing this notice?

SSA Swiss Advisors AG ("SSA")

What we do

How does SSA protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

How does SSA collect my personal information?

We collect your personal information, for example, when you

- Open your account or provide information
- deposit or withdraw funds or contact us
-

We also collect information about you from others, such as credit bureaux, verification data bases.

Why can't I limit all sharing?

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 nonaffiliates to market to you

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

What happens when I limit sharing for an account I hold jointly with someone else?

Please contact us for an explanation.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *BS/SA*

Nonaffiliates

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

- *No*

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *We do not have any such agreements*

Other important information

Additional information for non-US clients

Privacy Notice

Introduction

Your personal data is data which by itself, or with other data available to us, can be used to identify you. This Privacy Notice (hereinafter this “**statement**”) sets out how we will use your personal data.

This statement relates to the use of personal data obtained to run our business and provide you with products and services. It covers the processing of personal data whether or not you become a customer and includes any processing of personal data before you apply for products or services.

Responsible for the processing of your data and data controller

SSA Swiss Advisors AG

Postal Address: Uraniastrasse 34, 8001 Zurich, Switzerland

Data Protection Officer / Privacy Office Contact: info@ssa-wa.com

The types of personal data we collect and use

We will collect most of the data during the account application process, but we might complete your data with external sources when required to accomplish with our legal obligations.

The types of personal data will depend on the services we will provide to you and could include:

- Full name and personal details, including contact information (e.g. home and business address and address history, email address, home, business and mobile phone numbers);
- Date of birth and/or age;
- Financial details (e.g. salary and details of other income, and details of accounts held with other providers);
- Records of products and services you have obtained or applied for;
- When using mobile applications, the relevant technology used to access or manage them, (e.g. IP address or internet browser);
- Public available sources like fraud prevention agencies, court records of debt judgments and bankruptcies;
- Information about your family members or social circumstances if relevant to the product or service;
- Education and employment details/employment status if relevant to the product or service;
- Personal data about other named applicants; and
- Contact details and information about your business.
- Information pertaining to your accounts: account numbers, securities and non-securities holdings, balances, loans.
- Information regarding your transactions: cash and securities transactions, fees paid to third parties and taxes. This information includes you and your representatives.

Monitoring of communications

Subject to applicable laws, we will monitor and record your calls, emails, videoconferences and other communications relating to your dealings with us. We will do this for regulatory compliance, self-regulatory practices, crime prevention and detection, to protect the security of our communications systems and procedures and for quality control or in case we need a record of what has been said. We may also monitor

activities on your account where necessary for these reasons, and this is justified by our legitimate interests or our legal obligations.

Using your personal data

We will process your personal data:

- As necessary **to perform our contract with you** for the relevant account, product or service:
 - To take steps at your request prior to entering into a contract;
 - To decide whether to enter into a contract;
 - To manage and perform that contract;
 - To keep your records updated;
 - When you request that we disclose your personal data to other people or organizations such as a company handling a claim on your behalf, or otherwise agree to disclosures.
- As necessary **for our own legitimate interests** or those of other persons and organizations, such examples include but are not limited to:
 - For good governance, accounting, managing and auditing our business operations;
 - To monitor emails, calls, other communications, and activities on your account.
- As necessary **to comply with a legal obligation**:
 - For compliance with legal and regulatory requirements and related disclosures;
 - When you exercise rights under data protection law and make requests;
 - For establishment and defense of legal rights;
 - For activities relating to the prevention, detection and investigation of crime; and
 - To verify your identity, make credit, fraud prevention and anti-money laundering checks.

Sharing of your personal data

Subject to applicable data protection law and depending on the services provided, we may share your personal data with:

- Our affiliates in case such information is required in order to provide financial or other services you may have previously requested and limited to a need to know basis
- Sub-contractors and other persons who help us provide our products and services;
- Companies and other persons providing services to us;
- Our legal and other professional advisors, including our auditors;
- Fraud prevention agencies, and debt collection agencies when we open your account and periodically during your account or service management;
- Government bodies and agencies. This typically includes the Securities and Exchange Commission (SEC) in the US, the Financial Markets Supervisory Authority (FINMA) in Switzerland, the Swiss Limited Corporation for Supervision (AOOS);
- Courts, to comply with legal requirements, and for the administration of justice;
- Other parties connected with your account e.g. directors, shareholders, beneficial owners or any named official who will see your transactions, with your authorization;
- Other parties when we might restructure or sell our business or its assets or have a merger or re-organization;
- Anyone else where we you have given your authorization or as required by law.

International Transfers

Your personal data will not be transferred outside Switzerland and the European Economic Area while performing operations ordered by you.

Data anonymization and aggregation

Your personal data may be converted into statistical or aggregated data which cannot be used to identify you, although it can be used to produce statistical reports.

Identity verification and fraud prevention checks

The personal data we've collected from you at the account application or at any stage might be shared with fraud prevention agencies that will use it to prevent fraud and money-laundering and to verify your identity. We may also search and use our internal records for these purposes. We may also hold all the personal information you give to us (i.e. name, address, date of birth, nationality) to undertake periodic due diligence checks which banks are required to undertake to comply with legislation and regulation.

The personal data we have collected from you at the account application or at any stage might be shared with other financial institutions in order to conduct an investigation pertaining to your finance and business conduct.

Criteria used to determine retention periods (whether or not you become a customer)

The following criteria are used to determine data retention periods for your personal data:

- Retention in case of queries. We will retain your personal data as long as necessary to deal with your queries (e.g. if your application is unsuccessful); and
- Retention in accordance with legal and regulatory requirements. We will retain your personal data after your account, service or relationship has been closed or has otherwise come to an end based on our legal and regulatory requirements. In the majority of cases this will be for ten years from the end of your relationship with the us

Your rights under applicable data protection law

Your rights are as follows (noting that some of these rights apply only under certain circumstances):

- The right to have your personal data corrected if it is inaccurate and to have incomplete personal data completed ("right to rectification");
- The right to object to processing of your personal data;
- The right to restrict processing of your personal data;
- The right to have your personal data erased (the "right to be forgotten");
- The right to request access to your personal data and information about how we process it ("right of access by the data subject");
- The right to move, copy or transfer your personal data ("right to data portability").

For more details on all the above rights you can contact our Data Protection Officer (DPO) at the address mentioned at the beginning of this privacy notice.