

Privacy Policy

1. Privacy Policy

This privacy policy is to inform you about how we process your personal data. We process / hold your personal data when you enter into a customer relationship or other type of contractual relationship with us and/or purchase services and products from or apply to work for us or otherwise deal with us.

We will inform you in good time about additional processing activities not mentioned in this data protection declaration.

The processing of your personal data is subject to the Swiss Data Protection Act and, where applicable, the EU General Data Protection Regulation ("GDPR").

2. Our company

The company listed below is responsible for your data processing, unless otherwise communicated:

BM Asset Management AG
Baarerstrasse 79
6300 Zug

If you have any concerns about data protection or wish to exercise your rights, please contact the office listed below:

BM Asset Management AG
Executive Board
Baarerstrasse 79
6300 Zug
contact@bmam.ch

3. Processing / holding of personal data

Personal data¹ means all information relating to an identified or identifiable natural person. Data processing" means any handling of personal data, in particular the acquisition, storage, use, modification, disclosure, archiving, deletion or destruction of data.

When processing personal data, we observe the principles of data protection law. Where necessary, we process personal data only with your prior consent.

We process personal data that we receive from you or from third parties. Where permitted and appropriate, we then obtain personal data ourselves, e.g. from publicly accessible sources such as the internet, newspapers and reports.

If you provide us with personal data of other persons, you must be authorised to do so, e.g. by obtaining permission from the data subject. The data must then be correct. Please also ensure that they have read and understood this privacy policy.

¹ The terms personal data, personal information and data are used interchangeably in this privacy statement.

4. Data processing / holding

Visitors to our website

BM Asset Management AG does NOT analyze personal data when you visit the website www.bmam.ch

Technically we could [process the following data](#):

- Technical data, such as the IP address, browser used, operating system, cookies
Minutes etc.

Further information on visiting our website and the associated data processing is set out below in section 11.

Customers

We process personal data that we receive during (initiating) a client relationship. We receive the data directly from you while providing our services in asset and wealth management or partly through third parties, such as banks, asset managers, auditors or obtain them ourselves.

In particular, we process the following data:

- Master data (e.g. name, address, email address, telephone number, date of birth, gender, nationality, social media profiles, copies of IDs)
- Contractual data, i.e. the data we need to process the contractual relationship with you (e.g. type of contract, services, financial data, etc.).
- Data that we need to fulfil our due diligence investigations, e.g. data for identification or background checks
- Data on your preferences, e.g. based on the products and services you request
- Financial information
- Communication data

In the application procedure

As a matter of principle, we process the data that we receive from you or from third parties in the context of your application or obtain ourselves.

In particular, we process the following personal data:

- Master data (e.g. name, address, email address, telephone number, date of birth, gender, nationality, social media profiles, copies of IDs)
- Communication data
- Data from your CV
- Data from your references
- Information from reference persons
- Extract from the criminal record, extract from the debt collection register or other government information, confirmations, etc.
- Data that we obtain in the context of further clarifications (e.g. creditworthiness information, personal data in media reports, etc.).

It is possible that sensitive personal data will be processed. If your consent is required for this, we will inform you separately.

Business partners & other third parties

We process personal data that we receive as part of the (initiation of the) business relationship with you or with a business partner or in another context. We receive the data directly from you, from third parties or obtain it ourselves.

In particular, we process the following data:

- Master data (e.g. name, address, email address, telephone number, date of birth, gender, nationality, social media profiles, copies of IDs)
- Contractual data, i.e. the data we need to process the contractual relationship with you (e.g. type of contract, services, financial data, etc.).
- Communication data
- Data that we obtain in the context of further clarifications (e.g. creditworthiness information, personal data in media reports, etc.).
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5. Purpose of processing / holding

The purpose of processing, i.e. the way we process your personal data, depends on how you deal with us.

We process your data in particular for the following purposes:

We process data for the recording, administration and processing of **customer, contractual and employment relationships**, i.e. e.g.

- Provision of our services/offer of our products to you
- Fulfilment of contractual obligations
- When you apply for a job with us
- Fulfilment of our due diligence obligations, e.g. within the scope of "Know your Customer" clarifications or in supply chain management
- Further development of services and products
- Media monitoring
- Assertion of legal and other claims and defence in connection with legal disputes and official proceedings
- Prevention and investigation of criminal offences and other misconduct incl. conducting investigations

For **communication** with you, i.e. e.g.

- Contact
- Exchange of information and response to requests
- Relationship management
- Assertion of your rights

Communication can take place using all common means of communication, e.g. by letter, via e-mail, via an app, by telephone via social media, via chat, via forms on our website, etc.

In connection with **ensuring "compliance"**, i.e. if laws and regulations, orders/recommendations etc. from authorities, internal regulations etc. must be complied with or within the scope of the due diligence clarifications carried out by us.

6. Data transfer and data transmission abroad

We may share your data with third party recipients where necessary based on your consent or if they need your data to fulfil our contractual and legal obligations or to carry out their respective tasks. We may then share your data to protect our legitimate interests.

In particular, the recipients listed below may receive your data:

- Third parties (our contractual partners) such as consultants or providers of IT services who process your data as well as other external service providers and bodies such as banks, asset managers, insurance companies, auditors, associations
- Public bodies and authorities (e.g. FINMA, tax authorities) in the event of a legal or supervisory obligation or quality controls
- Other third parties, such as alternative delivery addressees, recipients of payments and services, third parties in the context of M&A transactions, lawyers, industry organisations, etc.

The recipients of your data may in turn involve third parties. We restrict the processing by some selected third parties, e.g. contractually. For other third parties, this is not always possible (e.g. public bodies and authorities as well as financial intermediaries)

The recipients of your data may be located in Switzerland, Europe but in exceptional cases may be located in any other country in the world.

If the data recipient is located in a country without adequate legal data protection and is not already subject to a recognised set of rules to ensure data protection, corresponding additional protective measures will be necessary, e.g. through contractually agreed specific data protection clauses. However, exceptions to this rule (e.g. in direct connection with the conclusion or performance of a contract, legal proceedings abroad, overriding public or private interest or your consent) may occur.

7. Profiling & automated individual decision

We do NOT carry out automated processing of personal data. This would consist of using your data to evaluate certain personal aspects relating to you, to analyse or predict aspects relating to your work performance, economic situation, health, personal preferences, interests, reliability, behaviour, location or change of location.

8. Information, correction, cancellation, and restriction

You have the right to request information about which of your data we process. You can also request that your personal data be corrected, blocked or deleted.

If our data processing is based on your consent, you have the right to revoke this consent.

Finally, you have the right to assert your claims through legal channels and/or to file a complaint with the competent authority. Such an authority may be based in Switzerland or abroad.

For the rights asserted, please contact the specialist office listed under point 2 in writing. Please note that under certain circumstances your rights may not be enforceable or may be restricted. Should this be the case, we will inform you accordingly.

9. Duration of the retention of personal data

In principle, personal data is retained until the purpose of the processing has been achieved; personal data is not deleted if we are obliged to retain it due to a legal or regulatory requirement, orders e.g. from authorities or a contractual agreement.

Likewise, deviating retention obligations are possible insofar as claims can be asserted against our company and insofar as we are otherwise legally obliged to do so or there is an overriding interest on our part in retention (e.g. for evidence and documentation purposes).

10. Data security

In order to ensure the confidentiality, integrity, availability and traceability of the data we store and process, we take extensive technical and organisational security precautions in our area of responsibility, which are regularly reviewed and adapted to technological progress.

In particular, the following measures were taken:

- Access restrictions and controls
- Data backups
- IT network and security solutions

11. Changes

This privacy policy may be amended at any time without prior notice. The version published on our website shall apply, insofar as it is more recent.

Date: **01.09.2023**