

Data Protection Declaration for clients and service providers

The LakeStreet Family Office AG («Financial institution»)

Valid from: 1st September 2023

Issued by: Board Of Directors

1. PURPOSE

We protect your privacy and your private data. We collect, process and use your personal data in accordance with the content of this Data Protection Declaration ("**Declaration**") and the applicable data protection regulations, in particular the Swiss Data Protection Act (FADP). This Declaration governs which personal data we collect, process and use about you. We therefore ask you to read the following carefully.

2. RESPONSIBLE PERSON

The Compliance Department is responsible for data processing. If you have any data protection concerns, please contact the Compliance Department. You can also procure a current version of this Declaration there at any time.

3. DIRECT AND INDIRECT PROCUREMENT OF PERSONAL DATA

For the purposes of this Declaration, personal data means any information relating to an identified or identifiable individual (hereinafter "**Data Subject**").

We primarily process the personal data that we receive from our clients and other business partners in the course of our business relationship with them and other persons involved in it.

Insofar as this is permitted and necessary, we also obtain data from third parties. This includes in particular data from the following categories: publicly accessible registers (e.g. debt enforcement registers, land registers, commercial registers), the press, the internet and social media etc., information that we learn in connection with administrative and court proceedings, information in connection with your professional functions and activities, information about you in correspondence and meetings with third parties, information about you that people close to you (family, advisors, legal

representatives, etc.) give us so that we can conclude or process contracts with you or involving you (e.g. references), powers of attorney, information on compliance with legal requirements such as the fight against money laundering, information from banks, insurance companies, sales and other contractual partners of ours on the use or provision of services by you (e.g. payments made, purchases made), information from the media and Internet about you (where this is appropriate in the specific case), your addresses and, where applicable, interests and other socio-demographic data.

If you provide us with data about third parties, please ensure that these third parties are aware of this Declaration and consent to the transfer of their data to us.

4. PURPOSES OF PROCESSING

We use the personal data we collect primarily to conclude and perform contracts with our clients and business partners, in particular in the context of asset management, and to comply with our legal obligations.

In addition, we process personal data from you and other persons, insofar as this is permitted and appears to us to be appropriate, for the following purposes in which we (and occasionally third parties) have a legitimate interest corresponding to the purpose:

- Communication with third parties (e.g. banks, brokers)
- Communication with authorities (e.g. supervisory organisation, FINMA, prosecutors) to fulfil information and reporting obligations, etc.
- Processing of orders and services
- Monitoring risks, limits, etc.
- Marketing of services and products to you
- Assertion and enforcement of any legal claims
- Securing the IT infrastructure

Insofar as you have given us consent to process your personal data for certain purposes, we process your personal data within the scope of and based on this consent, insofar as we have no other legal basis and we require such a basis. Consent given can be revoked at any time, but this has no effect on data processing that has already taken place.

5. DATA PROCESSING PRINCIPLES

When processing data, we take into account the data processing principles of legality, proportionality, purpose limitation, transparency - in particular the fulfilment of information obligations - and data security.

6. DATA SECURITY

All information that you submit to us is stored on servers within Switzerland.

We take appropriate technical and organisational security measures to protect your personal data from unauthorised access and misuse such as issuing instructions, training, IT and network security solutions as well as access controls and restrictions.

7. DATA DISCLOSURE AND DATA TRANSFER ABROAD

Within our Financial Institution, personal data is only accessible to those persons who need to have access to this data.

We also disclose personal data to the following categories of third parties within the scope of our business activities and the purposes set out in section 4, to the extent permitted and deemed appropriate:

- Supervisory, administrative, tax and other authorities
- Accounting, tax, legal & compliance and risk management services provider
- IT service providers
- Financial service providers (banks, brokers, administrators of funds and other financial products, etc.)

We may also be entitled or obliged to disclose data due to legal provisions and/or official or court orders. This may involve, in particular, the disclosure of information for the purposes of criminal prosecution, averting danger, etc.

No further disclosure of personal data to third parties will take place unless you have consented to the disclosure of data.

Personal data will not be forwarded abroad unless this is necessary for the processing of your business relationship or requested by you (e.g. in the case of investments abroad).

8. DURATION OF PERSONAL DATA STORAGE

We process and store your personal data for as long as it is necessary for the fulfilment of our contractual and legal obligations or otherwise for the purposes pursued with the processing, *i.e.* for example for the duration of the entire business relationship (from the initiation, performance to the termination of a contract) as well as beyond that in accordance with the statutory retention and documentation obligations. In this context, it is possible that personal data will be retained for the time during which claims can be asserted against our Financial Institution and insofar as we are otherwise legally obliged to do so or legitimate business interests require this (e.g. for evidence and documentation purposes). As soon as your personal data is no longer required for the above-mentioned purposes, it will be deleted or anonymised as a matter of principle and as far as possible.

9. OBLIGATION TO PROVIDE PERSONAL DATA

Within the scope of our business relationship, you must provide the personal data that is required for the establishment and implementation of a business relationship and the fulfilment of the associated contractual obligations. Depending on the service, you may have a legal obligation to provide us with data. This applies in particular in the combat against money laundering or the financing of terrorism. Without this data, we will generally not be able to conclude a contract with you (or the entity or person you represent) or to process it.

10. PROFILING

As a matter of principle, we do not use fully automated decision-making for the establishment and implementation of the business relationship and also otherwise. Should we use such procedures in individual cases, we will inform you separately about this, insofar as this is required by law, and inform you about the associated rights.

11. RIGHTS OF THE PERSON CONCERNED

You have the right to request information about your personal data processed by us. In particular, you can request information about the personal data as such, the purpose of processing, the retention period or, if this is not possible, the criteria for determining this period, the origin of your data if it was not collected from you, and, if applicable, the recipients or categories of recipients to whom personal data is disclosed.

Furthermore, you also have the right to correct incorrect data, the right to request the restriction of processing of data that has been processed too extensively and the right to delete personal data that has been processed unlawfully or stored for too long (insofar as this does not conflict with any legal obligation to retain data and no other reasons according to the Data Protection Act). Finally, you also have the right to revoke any consent you may have given to use your personal data at any time.

You can exercise your aforementioned rights at any time by contacting us at the contact address provided. The exercise of such rights usually requires that you clearly prove your identity (e.g. by means of a copy of your identity card where your identity is otherwise not clear or cannot be verified).

Please note, however, that we reserve the right to enforce the restrictions provided for by law, for example if we are obliged to retain or process certain data, have an overriding interest in doing so (insofar as we are entitled to rely on this) or require it for the assertion of claims. Please also note that the exercise of these rights may conflict with contractual agreements and may have consequences such as the premature termination of the contract or cost consequences. We will inform you in advance if this is not already contractually regulated.

In addition, every Data Subject has the right to enforce his or her claims in court or to file a complaint with the Federal Data Protection and Information Commissioner.

12. UPDATES TO THIS DECLARATION

We may amend this Declaration at any time without prior notice. The current version published on our website will apply. Insofar as this Declaration is part of an agreement with you, we will inform you of the change by e-mail or other suitable means in the event of an update.

The Chairman:

A handwritten signature in blue ink, appearing to read "Stefano Bianchi".

Stefano Bianchi

A member of the Board of Directors:

A handwritten signature in blue ink, appearing to read "Dr. Alexander Bischoff".

Dr. Alexander Bischoff