

## PROTECTION OF PERSONAL DATA

The purpose of this personal data protection statement (hereinafter, the "Statement") is to inform the customers of MFM Mirante Fund Management Ltd., i.e. the persons affected by the collection, storage and processing of data (hereinafter, the "Data Subjects"), about the manner in which MFM Mirante Fund Management Ltd. collects, stores and processes personal data.

### 1. Preamble

MFM Mirante Fund Management SA , a public limited company, with its registered office at Rue Etraz 4, 1003 Lausanne (hereinafter, "MFM"), recognizes the importance of keeping its clients' personal data confidential and protecting their right to privacy. Given its activities and the data collected, MFM intends to apply the principles and standards of personal data protection.

Therefore, all personal data and information (hereinafter, the "Data") communicated in the framework of our services will be treated in a lawful, fair, transparent and confidential manner by MFM.

### 2. Consent

By contracting for the services offered by MFM (hereinafter, the "Services"), and in accordance with the legal provisions in force, Data Subjects acknowledge and agree that, in the context of the MFM Services, Data is collected by MFM. This Data is collected and used for the sole purpose of the Services offered by MFM or any subsequent contractual relationship with MFM. For this purpose, it may be transmitted to any third party, in the framework of the execution of a mandate.

Data Subjects acknowledge that the collection and processing of Data by MFM is necessary for the performance of the mandates entrusted to Data Subjects in connection with the Services, but also for the preservation of MFM's legitimate interests and for the compliance with MFM's legal obligations.

Data is collected by MFM for the following Services that the company provides to Data Subjects:

- Asset management via a direct or indirect discretionary management mandate
- Asset management via an investment advisory mandate
- Asset planning
- Mortgage Mandate
- Setting up of professional and private pension plans (vested benefits, mandatory plan 1E, 3A)

### 3. What Data is collected?

Within the framework of the Services offered to the Persons concerned, MFM is brought to collect the following data (non exhaustive list):

- Identification data: personal identification data (name, surname, title, tax number, marital status, profession, name of children, not of spouse, etc.. )
- Identification data issued by public services and other registers: identity cards, passports, certificate of incorporation, articles of association, share registers.
- Location data: personal, business and/or investment entity addresses.
- Electronic communication and identification data (personal and professional): telephone numbers, e-mail addresses.
- Financial data: identification and bank account numbers, financial statements / assets, financial transactions.

MFM collects and stores all Data provided to it in connection with the Services in its customer relationship management (CRM) system or on its servers. However, Data Subjects may choose not to provide certain information to MFM. This decision may, however, result in their not being able to access certain Services or features offered through the Services.

As part of the Services, MFM may also collect Data from third parties. Data collected from third parties is processed in the same manner as Data collected directly from Data Subjects.

### 4. Data processing

The Data are processed and stored by MFM mainly through computer tools, but also on paper (conservation of originals) only for the purpose of executing the mandates entrusted.

MFM retains Data for the time necessary to fulfill its mandates and in the forms in which it was collected, in accordance with applicable regulations for the Services (e.g., ten years for banking services or seven years under FATCA regulations).

Similarly, MFM will delete or anonymize personal data (or take equivalent measures) once it is no longer necessary to fulfill the mandate given subject to applicable legal or regulatory requirements to retain data for a longer period of time, or to determine, exercise and/or defend actual or potential rights in judicial proceedings, investigations or similar proceedings, including legal declarations that MFM may impose to preserve relevant information.

Strict measures are applied to prevent the risk of data loss, illegal or improper use and unauthorized access.

## 5. Knowledge and Data Transmission

The Data that will be transmitted to MFM will be known and used by MFM employees with the sole purpose of performing the Services that constitute the reason for which the Data was collected.

Within the framework of the execution of the Services, MFM can be brought to transmit the Data to third parties, in particular to the Depository Banks and/or other partners of MFM.

The transfer of data to third parties is based on and justified by the mandate given to MFM.

MFM does not sell or rent the Data to any third party.

Finally, MFM may share your personal data:

- To make available to the Persons concerned the Service they need
- Where permitted or required by law to remain consistent with a valid legal process

## 6. Privacy, security and data protection

MFM undertakes to guarantee the existence of adequate levels of protection in accordance with the applicable legal and regulatory requirements, in particular those relating to banking secrecy and data protection.

The Data of the Data Subjects will be transmitted to and stored on MFM's servers, access to which is strictly limited. MFM has taken appropriate technical and organizational precautions to ensure that only duly authorized persons have access to the company's servers, as well as special precautions regarding the protection of MFM's technical environment (e.g. use of firewalls).

## 7. Rights of the Persons concerned

In accordance with the applicable regulations, in the context of the processing of Data, Data Subjects may exercise the following rights regarding their Data:

- Right to request access to stored Data
- Right to request rectification of stored Data
- Subject to the applicable legal provisions on the retention of Data (banking law, FACTA law, etc.), the right to request the deletion of retained Data

- Subject to the legal provisions applicable to the processing of Data (banking law, FACTA law, EAR, etc.), the right to request a limitation of the processing of stored Data
- Subject to the applicable legal provisions on data processing (banking law, FACTA law, EAR etc.), the right to request a ban on the processing of stored Data.

Generally, Data Subjects have the right to require MFM to protect their Data. MFM works tirelessly to protect itself and its users from unauthorized access, alteration, disclosure or destruction of information that is held. Specifically:

- MFM complies with this Statement at all times with respect to all Data MFM collects about Data Subjects
- MFM limits the use and disclosure of Data Subjects' Data and ensures that anyone with whom MFM shares such information treats it with the confidentiality and security it deserves.