

LJ Management (Suisse) S.A.

DATA PRIVACY NOTICE

LJ Management (Suisse) S.A. (“**LJMS**”) is a company which provides clients and investors (“**Clients**” and “**Investors**” respectively, collectively “**you**”) with a platform for certain structuring and administrative services .

In order to provide you with the highest possible levels of service, we, LJMS, may need to process data that you have provided to us that we acquire in the course of providing services to you and to disclose your personal data to our affiliates, selected third party service providers and certain regulatory authorities, as explained in this document.

LJMS takes the privacy and security of your personal data very seriously and is committed to protecting and respecting your privacy. This notice is designed to assist you in understanding what data LJMS collects and processes and for what purpose data is being collected/processed.

LJMS reserves the right, at its discretion, to change, modify, and/or remove sections from this notice of disclosure at any time. If it makes any material changes to this notice of disclosure, it will notify you by email or by means of a notice on our website.

1. What data do we collect and process?

LJMS may collect and process the following data:

- Name and surname;
- Address;
- Email address;
- Telephone number;
- Date of birth;
- Nationality;
- Passport and/or ID card details;
- Bank account numbers and names;
- Wealth (including information regarding source and level of wealth);
- Information in respect of professional qualifications and work experience;
- The above-mentioned information on data subjects who are beneficial owner(s) of structures;
- Transactions that are or may be maintained on the data subject's (“data subject” is defined in article 4 of the EU General Data Protection Regulation, “GDPR”)) records; and
- Details of custodians of the data subject's or associated Client's accounts including their contact details.

2. For what purposes do we process data?

LJMS may use your data for the following purposes:

- providing the services pursuant to the engagement entered into between Clients and LJMS, LJ Management (IOM) Limited, LJ Management (UK) Limited or LJ Private Office (UK) Limited (“**Client Engagements**”);
- coordinating the administration of the Client Engagements;

- coordinating and facilitating Client interactions with affiliates of LJMS (please see “**Affiliate Offices**” below);
- responding to your requests for information;
- making available products and services offered by other Affiliate Offices;
- complying with a legal or regulatory duty to disclose your data (for example if required to do so by a court or a government authority, or to prevent a fraud or another crime);
- enforcing the terms of any agreement with you.

3. What are your rights?

You have the right, at any time, to:

- request us to stop processing your data. This may mean that we are no longer able to provide you with services;
- obtain a copy of your personal data being processed;
- request any corrections or adjustments to the processed data or any rectifications or erasure of (incorrect) data;
- request the restriction of the processing of the personal data in accordance with applicable privacy legislation (please note that this may mean that we are no longer able to provide you with services); and
- contact the Federal Data Protection and Information Commissioner (Eidgenössischen Datenschutz- und Öffentlichkeitsbeauftragten, “**EDÖB**”) and/or any other public authority responsible for data protection in Switzerland, if LJMS does not comply with applicable privacy legislation.

Such rights can be exercised by addressing a written request to the Managing Director, LJ Management (Suisse) S.A., Rue Saint-Léger 8, 1205 Geneva

4. Who do we share your data with? (disclosure to third parties)

LJMS may disclose your data to other Affiliate Offices (as listed below) for the purposes described in this notice. Affiliate Offices may themselves process such data to improve their services to you or to LJMS. In particular, we may disclose your data to:

- LJ Management (IOM) Limited;
- LJ Capital Limited;
- LJ Skye Trustees Limited;
- LJ Management (UK) Limited;
- LJ Private Office (UK) Limited;
- LJ Athene Investment Advisors Limited;
- Salisbury Partners LLP.

No data will be sold, traded or rented to others for their own purposes. However, LJMS may share your data with selected third parties including third party service providers used by LJMS and governmental or judicial bodies or agencies, regulatory and tax authorities to comply with legal and regulatory obligations.

LJMS is committed to protecting your privacy and keeping your personal data secure. It will therefore take all reasonable steps to ensure the data provided by you or other data about you is kept securely by Affiliate Offices and third parties and is not subject to unauthorised access or disclosure.

5. Transferring your information outside of Switzerland and Europe

As part of the services that we provide to you, the information you provide to us will be transferred to, and stored in, countries outside of Switzerland and the European Union (the “EU”). For example, we may share information with other Affiliate Offices outside the EU. These countries may not have similar data protection laws to Switzerland. If we transfer your information outside of the EU in this way, we will take steps with the aim of ensuring that your privacy rights continue to be protected as outlined in this notice.