

VERAISON Capital AG

Privacy Policy

1. Purpose and identity of the Controller

This privacy notice contains general information on what personal data VERIASON Capital AG (“VERAISON”) collects and processes, for which purpose and what rights you have.

VERAISON acts as the Controller with regard to the processing of personal data under this privacy notice. You may contact us via the address provided in Section 8 of this privacy notice.

2. Personal data collected

VERAISON can collect and process personal data about you including:

- personal details such as your name, identification number, date of birth, address, KYC documents (including a copy of your national identity card or passport), phone number physical and electronic address provided to us, for example by registering with our Newsletter, the general meeting of funds managed by us or otherwise;
- financial information, including payment and transaction records and information relating to your assets, revenues, earnings and investments (including your investment objectives);
- tax domicile and other tax-related documents and information;
- where applicable, professional information about you, such as your job title and work experience;
- your knowledge of and experience in investment matters;
- details of our interactions with you and the products and services you use;
- identifiers we assign to you, such as your investor login number;
- protocol of our distribution activity related to you;
- when you access our Website, data transmitted by your browser and automatically recorded by our server, including date and time of the access, name of the accessed file as well as the transmitted data volume and the performance of the access, your web browser, browser language and generally information transferred regarding the operating system and browser, requesting domain, and IP address.

In some cases, we collect this information from publicly available information or other third parties.

Additionally, where you are an institutional or corporate client or investor, we may also collect information about your directors, employees or shareholders.

3. Purposes of personal data processing

When processing personal data for the purposes described herein, we rely, among other things, on our legitimate interest in maintaining and managing the business relationship and communicating with you, in distributing services or products, and fulfilling our legal, contractual or regulatory obligations.

We process personal data in particular for the following purposes:

- distributing and providing products and services to you and ensuring their proper execution;
- client on-boarding processes, including to verify your identity and assess your application (including the need for guarantees or other securitisation tools) if you apply for credit, and to conduct legal and other regulatory compliance checks;

- managing our relationship with you, including communicating with you in relation to the products and services you obtain from us and from our business partners, handling customer service-related queries and complaints;
- to learn more about you as a customer, the products and services you receive, and other products and services you may be interested in receiving, including profiling based on the processing of your personal data, for instance by looking at the types of products and services that you use from us, how you like to be contacted and so on;
- to improve our products and services, including testing and upgrading of systems and processes, and conducting market research to understand how to improve of existing products and services or learn about other products and services we can provide;
- contacting you for direct marketing purposes about products and services that may be of interest to you;
- meeting our on-going regulatory and compliance obligations (e.g. laws of the financial sector, anti-money-laundering and tax laws);
- ensuring the safety of our customers, employees and other stakeholders;
- undertaking transactional and statistical analysis, and related research;
- for the VERAISON prudent operational management; and
- any other purposes we notify to you from time to time.

4. Access to personal data

Within VERAISON

We usually share personal data within VERAISON.

Third Parties

When providing products and services to you, we will share personal data with persons acting on your behalf or otherwise involved in the transaction (depending on the type of product or service you receive from us), including, where relevant, other financial institutions;

Service providers

In some instances, we also share personal data with our supplier or customers including IT and hosting providers, marketing providers, communication services and printing providers and others.

Public or regulatory authorities

If required from time to time, we disclose personal data to public authorities, regulators or governmental bodies, including when required by law or regulation.

5. International transfers of personal data

Some of the recipients referred to in section 4 above are located outside Switzerland. Accordingly, your personal data may be transferred to the following countries:

- EEA and EU member states;
- USA;
- UK.

The basis for the personal transfers are either adequacy decisions of the competent data protection supervisory authorities or Standard Contractual Clauses as approved by the competent data protection supervisory authorities where required.

6. Duration of data storage

We will only retain personal data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. In general, VERAISON will retain personal data for the period of your relationship with VERAISON plus 10 years. An ongoing or anticipated legal or regulatory proceeding may lead to retention beyond this period.

VERAISON also stores all incoming and outgoing data (in particular e-mails with attachments) in a separate archive for a period of 10 years.

7. Your rights

You have a right to ask VERAISON to rectify inaccurate personal data we collect and process.

Where we process your personal data on the basis of your consent, you have the right to withdraw that consent at any time. Please also note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

You have a right to ask us to stop processing your personal data, or to request deletion of your personal data – these rights are not absolute (as sometimes there may be overriding interests that require the processing to continue, for example).

Where we process your personal data on the basis of your consent or in connection with the conclusion or performance of a contract, you may have the right under applicable data protection laws to request your personal data be transferred to you or to another controller.

8. Exercising your rights, and complaints

You may exercise any of your rights in relation to your personal data by writing to us at the following address: VERAISON Capital AG | Lintheschergasse 10 | CH-8001 Zürich.

To avoid delay in dealing with your request, please enclose with your signed letter a copy of your passport or identity card.

9. Security

In close collaboration with the website's hosting provider, VERAISON protects its databases as much as possible from undesirable access, losses, abuses or falsifications. As complete data security cannot be guaranteed for communication via e-mails, instant messaging, and similar means of communication, we would recommend sending any particularly confidential information by an alternative secure means.

10. Changes to personal data

We are committed to keeping your personal data accurate and up to date. Therefore, if your personal data changes, please inform us of the change as soon as possible.

11. Legal notice

This privacy notice is explaining what VERAISON does, rather than a document that binds VERAISON or any other party contractually. We reserve the right to amend it from time to time.