

Privacy Policy

With this Privacy Policy we, Triatlum Advisors, describe how we collect and process personal data. This Data Protection Statement is not necessarily a comprehensive description of our data processing. It is possible that other data protection statements are applicable to specific circumstances.

In this Privacy Policy, the term "personal data" refers to any information that identifies or could reasonably be used to identify any natural person.

If you provide us with personal data of other individuals (such as family members or work colleagues), please ensure that those individuals are aware of this Data Protection Statement. Only provide us with their data if you are authorized to do so and ensure that the personal data provided is accurate.

This Privacy Notice is in accordance with the EU General Data Protection Regulation («GDPR») and the Swiss Data Protection Act («DPA»). However, the application of these laws depends on each individual case.

A. Data Controller

The "controller" of data processing as described in this privacy policy (i.e. the responsible person) is:

Triatlum Advisors AG
23 Sihleggstrasse
8832 Wollerau
admin@triatlum.com
www.triatlum.com

If you have any questions regarding how your personal data is processed or any other data protection concerns, you can contact us using the above-mentioned contact details.

B. Purpose of Data Processing and Legal Bases

We primarily use collected data to enter into and fulfill contracts with our clients and business partners, particularly in relation to providing financial services to our clients and procuring products and services from our suppliers and subcontractors. We also process personal data to comply with domestic and foreign legal obligations.

Additionally, in accordance with the applicable law and where appropriate, we may process personal data for the following purposes, which are in our (or, where applicable, third parties') legitimate interest:

- Providing and developing our products, services and websites, apps and other platforms in which we are involved.
- Communication with third parties and handling their requests (e.g., job applications, media inquiries).
- Advertisement and marketing (including event organization), provided that you have not objected to the use of your data for this purpose (if you are part of our client base and you receive advertisement, you may object at any time, and we will add you to a blacklist to stop further advertising mailings).
- Asserting legal claims and defending against legal disputes and official proceedings.
- Prevention and investigation of criminal offenses and other misconduct.
- Ensuring the smooth operation of our IT systems, websites, apps, and other devices.

- Acquisition and sale of business divisions, companies, or parts of companies, and other corporate transactions involving the transfer of personal data. This includes measures for business management and compliance with legal and regulatory obligations, as well as internal company regulations.

If you have provided us with your consent to process your personal data for specific purposes (for example when registering to receive newsletters), we will process your personal data within the scope of and based on this consent, unless we have another legal basis if one is required. You have the right to withdraw your consent at any time, but this does not affect the processing of data that occurred prior to the withdrawal.

C. Collection and Processing of Personal Data

We primarily process personal data that we obtain from our clients, business partners, and individuals in the context of our business relationships. Additionally, we collect data from users when operating our websites, apps, and other applications.

Where permitted, we may acquire certain personal data from publicly accessible sources (e.g., debt registers, land registries, commercial registers, press, internet) or receive such information from affiliated companies of Triatlum Advisors AG, authorities, or other third parties (such as e.g., custodian banks). In addition to the data provided directly by you, the categories of data we receive from third parties include, but are not limited to: information from public registers, data received in administrative or court proceedings, information related to your professional role and activities (e.g., to conclude and fulfill contracts with your employer), information from correspondence and discussions with third parties, information provided by individuals associated with you (family, consultants, legal representatives, etc.) to conclude or process contracts with your involvement (e.g. powers of attorney), information regarding legal regulations such as anti-money laundering, bank details, information about you from media or internet sources (in specific cases, e.g. job applications, media reviews, marketing/sales, etc.), your address, and data related to your use of our websites (e.g., IP address, MAC address of your smartphone or computer, device and settings information, cookies, date and time of visit, accessed content and sites, used applications, referring website, localization data). In principle, we retain this data for the duration of the contractual relationship. Thereafter, this data will be restricted for further use and will only be available for special purposes. These purposes include in particular compliance with the statutory retention periods and the assertion, exercise and defence of legal claims, for example as proof of proper advice or compliance with money laundering obligations. If the personal data are no longer required for the above-mentioned purposes and if all retention periods have expired, they will be permanently deleted.

D. Cookies / Tracking and other relevant Information regarding the Use of our Website

Technical Data

We are not using cookies nor tracking and other other relevant information regarding the use of our website.

Communication Data

If you contact us via the contact form, e-mail, telephone, letter, or any other means of communication, we collect the exchanged data between you and us, including your contact details and relevant communication details. If we record or listen to telephone conversations or video conferences, e.g. for training and quality assurance purposes, we will inform you of this practice. Any recordings will be made and used in accordance with our internal guidelines and applicable laws.

Social Media Plug-ins

We use plug-ins from social networks such as LinkedIn on our website (www.triatlum.com). These plug-ins are identifiable by their respective symbols. By default, we have configured these elements to be disabled. If you choose to activate them (by clicking on them), the operators of the respective social networks may collect information that you are visiting our website, which page you are accessing from, and may use this information for their own purposes. The processing of your personal data in this context is the responsibility of the respective operator and is conducted in accordance with their data protection regulations. We do not receive any information about you from the respective operator.

E. Sharing Data with Third Parties and Transfer of Data Abroad

Data transfer to units in states outside Switzerland and the EU (known as third countries) takes place in case of the following:

- It is necessary for the purpose of carrying out Client orders (e.g., payment and securities orders).
- It is required by law (e.g., reporting obligations under fiscal law).

F. Duration of data storage

Your data, which includes personal data, will be processed and stored only for as long as necessary to fulfil our contractual and legal obligations or for the purposes stated in the data processing activities. This may include the entire duration of the business relationship and beyond, based on legal retention requirements and documentation obligations. It is possible that personal data will be retained for the time in which claims can be asserted against our company and insofar as we are otherwise legally obliged to do so, or if legitimate business interests require it (e.g. for evidence and documentation purposes). Once your personal data is no longer required for the above-mentioned purposes, it will be erased or anonymized, to the extent possible. For operational data (e.g. system protocols, logs), shorter retention periods could apply.

G. Data Security

We have taken appropriate technical and organizational security measures to protect your personal data against unauthorized access and misuse. These measures include issuing instructions, training, IT and network security solutions, access controls and restrictions, encrypting passwords, data storage devices and transmissions.

We cannot guarantee the security of data transmission over the internet. When transmitting data by email, there is a certain risk of access by third parties.

H. Your Rights

In accordance with and as far as provided by applicable law, you have the right to access, rectification and erasure of your personal data, the right to restriction of processing or to object to our data processing, in particular for direct marketing purposes, for profiling carried out for direct marketing purposes and for other legitimate interests in processing in addition to right to receive certain personal data for transfer to another controller (data portability). Please note, however, that we reserve the right to enforce statutory restrictions on our part, for example if we are obliged to retain or process certain data or if we have an overriding interest (insofar as we may invoke such interests) or need the data for asserting claims.

We have already informed you of the possibility to object/withdraw consent at any time. Please be aware that exercising your rights may have implications for your contractual obligations and this may result in consequences such as premature contract termination or associated costs. If this is the case, we will inform you in advance unless it has already been contractually agreed upon.

In general, exercising these rights requires that you are able to proof your identity (e.g., by a copy of identification documents where your identity is not evident otherwise or can be verified in another way). In order to assert these rights, please contact us via the details provided above.

In addition, every data subject has the right to enforce his/her rights in court or to lodge a complaint with the competent data protection authority. The competent data protection authority of Switzerland is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

I. Profiling [and Automated Individual Decision-Making]

The Company does not use profiling.

J. Changes to this Privacy Policy

We may amend this Privacy Policy at any time without prior notice. The current version published on our website shall apply.