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## PRIVACY POLICY

### 1. RESPONSIBLE AUTHORITY AND CONTACT

The controller within the meaning of data protection laws, in particular the EU General Data Protection Regulation (GDPR), is:

swiss global family office ag  
Rigistrasse 167  
6340 Baar ZG  
Schweiz

Telephone: +41 41 510 80 63

E-Mail: info@globfamoffice.com

Website: <https://www.globfamoffice.com>

### 2. GENERAL INFORMATION

Based on Article 13 of the Swiss Federal Constitution and the data protection provisions of the Swiss Confederation (Data Protection Act, DSG), every person is entitled to protection of their privacy and protection against misuse of their personal data. The operators of these pages take the protection of your personal data very seriously. We treat your personal data confidentially and in accordance with the statutory data protection regulations and this privacy policy.

In cooperation with our hosting providers, we endeavor to protect the databases as well as possible against unauthorized access, loss, misuse or falsification.

We would like to point out that data transmission over the Internet (e.g. when communicating by e-mail) may be subject to security vulnerabilities. Complete protection of data against access by third parties is not possible.

By using this website, you consent to the collection, processing and use of data in accordance with the following description. This website can generally be visited without registration. Data such as pages called up or the name of the file called up, date and time are stored on the server for statistical purposes without this data being directly related to your person. Personal data, in particular name, address or e-mail address, are collected on a voluntary basis as far as possible. No data will be passed on to third parties without your consent.

### 3. COLLECTION AND PROCESSING OF PERSONAL DATA

We process personal data in the following areas in particular:

- Customer data of persons for whom we have provided or are providing services.
- Personal data that we have received indirectly from our customers as part of the service.
- When visiting our website.
- In the context of communication or visits.
- In the context of other contractual relationships, for example as a supplier, service provider or consultant.
- When required by law or regulation.



- When we exercise our due diligence or other legitimate interests, for example to avoid conflicts of interest, prevent money laundering or other risks, ensure data accuracy, check creditworthiness, ensure security or enforce our rights.

Details can be found in the following descriptions of the types of personal data.

#### 4. TYPES OF PERSONAL DATA

The type of personal data we process depends on your relationship with us and the purpose for which we process it. In addition to your contact details, we also collect other information about you or people associated with you. This information may be particularly sensitive personal data.

We collect the following types of personal data, depending on the purpose for which we process it:

- Contact information (e.g. surname, first name, address, telephone number, e-mail)
- Customer information (e.g. date of birth, nationality, marital status, profession, title, job title, passport/ID number, AHV number)
- Risk assessment data (e.g. credit rating information, commercial register data)
- Financial information (e.g. bank details)
- Mandate data corresponding to the respective mandate (e.g. tax information, articles of association, minutes, projects, contracts, employee data such as salary, social security data, accounting data, beneficial owners, ownership structure)
- Website data (e.g. IP address, device information (UDI), browser information, information on website use (analysis and use of plugins, etc.))
- Marketing information (e.g. newsletter registration)

To the extent permitted by law, we also obtain certain data from publicly accessible sources (such as debt collection registers, land registers, commercial registers, the press and the Internet) or receive such data from our clients and their employees, from authorities, (arbitration) courts and other third parties. In addition to the data that you provide to us directly, the categories of personal data that we receive about you from third parties include, in particular:

- Information from public registers
- Information that becomes known about you in connection with official and judicial proceedings
- Information in connection with your professional functions and activities, for example to conclude and process transactions with your employer
- Information about you from correspondence and meetings with third parties
- Credit information
- Information about you from people close to you (family, advisors, legal representatives, etc.) in order to conclude or process contracts with you (e.g. references, delivery addresses, powers of attorney)
- Information on compliance with legal requirements such as anti-money laundering and export restrictions
- Information from banks, insurance companies, sales and other contractual partners regarding the use or provision of services by you (e.g. payments made, purchases made)
- Information about you from the media and the Internet (insofar as this is relevant in a specific case, e.g. as part of a job application, etc.)
- Your addresses and, if applicable, interests and other socio-demographic data (for marketing purposes)



- Data in connection with the use of our website (e.g. IP address, MAC address of the smartphone or computer, device information and settings, cookies, date and time of the visit, pages and content accessed, functions used, referring website, location data).

## 5. PURPOSE OF DATA PROCESSING AND LEGAL BASIS

### 5.1. PROVISION OF SERVICES

We primarily process the personal data obtained in the context of our client relationships with our clients and other contractual relationships with their business partners and other persons involved.

The personal data of our clients includes in particular the following information:

- Contact information (e.g. surname, first name, address, telephone number, e-mail, other contact information)
- Personal information (e.g. date of birth, nationality, marital status, profession, title, job title, passport/ID number, AHV number, family circumstances, etc.)
- Risk assessment information (e.g. creditworthiness information, commercial register data, sanctions lists, specialized databases, internet data)
- Financial information (e.g. bank details, investments or shareholdings)
- Mandate data, depending on the mandate (e.g. tax information, articles of association, minutes, employee data such as salary, social insurance, accounting data, etc.)
- Particularly sensitive personal data: This data may also include particularly sensitive information such as health data, religious beliefs or social welfare measures, especially if we provide payroll processing or accounting services.

This personal data is processed for the purposes described on the basis of the following legal bases:

- Conclusion or performance of a contract with or for the benefit of the data subject, including contract initiation and any enforcement (e.g. consulting, fiduciary services)
- Fulfillment of a legal obligation (e.g. disclosure obligations)
- Safeguarding legitimate interests (e.g. administrative purposes, improving quality, ensuring safety, risk management, enforcing our rights, defending against claims, examining potential conflicts of interest)
- Consent (e.g. sending of marketing information)

### 5.2. INDIRECT DATA PROCESSING FROM THE PROVISION OF SERVICES

When we provide services to our customers, we may also process personal data that we have not collected directly from the data subjects or data from third parties. These third parties are usually employees, contact persons, family members or persons who have a relationship with the customers or the data subjects for other reasons. We require this personal data in order to fulfill contracts with our customers. We receive this data either from our customers or from third parties commissioned by our customers. Third parties whose information we process for this purpose are informed by our customers that we process their data. Our customers can refer to this privacy policy.

The personal data of persons who have a relationship with our customers includes the following information in particular:

- Contact information (e.g. surname, first name, address, telephone number, e-mail, other contact information, marketing data)



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- Personal information (e.g. date of birth, nationality, marital status, profession, title, job title, passport/ID number, AHV number, family circumstances, etc.)
  - Financial information (e.g. bank details, investments or shareholdings)
  - Mandate data, depending on the mandate (e.g. tax information, articles of association, minutes, employee data such as salary, social insurance, accounting data)
  - Particularly sensitive personal data: This may also include sensitive data such as health data, religious views or information on social assistance measures, particularly if we provide payroll processing or accounting services.

This personal data is processed for the purposes described on the basis of the following legal bases:

- Conclusion or performance of a contract with or for the benefit of the data subject (e.g. fulfillment of our contractual obligations)
- Fulfillment of a legal obligation (e.g. disclosure obligations)
- Safeguarding legitimate interests, in particular our interest in offering our customers optimal services

### **5.3. USE OF OUR WEBSITE**

The use of our website does not require the disclosure of personal data. However, the server collects a range of user information each time the website is accessed, which is temporarily stored in the server's log files.

This general information is collected without being directly linked to a specific person. This data is technically required to ensure the display of our website as well as its stability and security. It is also used to improve the website and analyse its use.

This information includes in particular:

- Contact information (e.g. surname, first name, address, telephone number, e-mail)
- Other information that you transmit to us via the website
- Technical information automatically transmitted to us or our service providers, information on user behavior or website settings (e.g. IP address, device type, browser, number of page views, opening of the newsletter, clicks on links, etc.).

This personal data is processed for the purposes described on the basis of the following legal bases:

- Safeguarding legitimate interests (e.g. administrative purposes, improving quality, data analysis or publicizing our services)
- Consent (e.g. to the use of cookies or the newsletter).

### **5.4. DIRECT COMMUNICATION AND VISITS**

When you contact us (e.g. by telephone, e-mail or chat) or we contact you, we use the necessary personal data. This data is also processed when you visit us in person. In such cases, it may be necessary for you to leave your contact details before your visit or at reception. We store this information for a limited period of time in order to protect our infrastructure and our data.

This personal data is processed for the purposes described on the basis of the following legal bases:

- Performance of a contractual obligation with or for the benefit of the data subject, including contract initiation and, where applicable, enforcement (provision of a service)



- Safeguarding legitimate interests (e.g. security, traceability, processing and management of customer relationships).

## 5.5. CONTRACTUAL PARTNERS

If we conclude a contract with you in order to obtain a service from you, we process personal data about you or your employees. This data is required to maintain communication with you and to make use of your services. We may also process this personal data to ensure that the collaboration does not entail any unwanted risks, for example with regard to money laundering or sanctions.

The information processed includes in particular:

- Contact information (e.g. surname, first name, address, telephone number, e-mail).
- Personal information (e.g. profession, function, title, employer).

This personal data is processed for the mentioned purposes on the basis of the following legal bases:

- Conclusion or performance of a contract with or for the benefit of the data subject, including contract initiation and, where applicable, enforcement.
- Protection of legitimate interests (e.g. avoidance of conflicts of interest, protection of the company, enforcement of legal claims).

## 6. COOKIES

On our website we use cookies, small files that your browser automatically creates and stores on your end device (e.g. laptop, tablet, smartphone) when you visit our site.

These cookies contain information that relates to the respective end device, but do not allow any direct conclusions to be drawn about your identity. One purpose of using cookies is to make the use of our website more convenient for you. We use so-called session cookies to recognize whether you have already visited certain pages of our website, which are automatically deleted after you leave our site.

We also use temporary cookies to optimize user-friendliness. These are stored on your end device for a specified period of time so that when you visit our site again, it recognizes which entries and settings you have already made.

On the other hand, we use cookies to statistically record the use of our website and to optimize it for you. These enable us to automatically recognize that you have already visited our site when you return and serve to evaluate and improve our offer.

The processing of the data collected by cookies is necessary for the purposes mentioned. Most browsers accept cookies automatically, but you can set your browser so that no cookies are stored on your computer or you are informed about new cookies. Please note, however, that completely deactivating cookies may mean that you cannot use all the functions of our website.

## 7. WEB ANALYSIS

We use certain web analytics tools and re-targeting technologies, including Google Analytics, to gain insights into the use of our website, to improve our online offering and to target you with advertising on third-party websites or social media.

These tools are provided by third parties. As a rule, the information about the use of a website for this purpose is transmitted to the server of the third-party provider using cookies or similar technologies. The servers of these third-party providers are usually located abroad.



Data is usually transmitted with a shortened IP address to prevent the identification of individual end devices. This information is only passed on by third-party providers within the framework of legal regulations or as part of order data processing.

## **8. DATA DISCLOSURE AND DATA TRANSFER**

We only pass on your data to third parties if this is necessary for the provision of our services, if these third parties provide services for us, if we are legally or officially obliged to do so or if we have a legitimate interest in passing on the personal data. We also pass on personal data to third parties if you have given your consent or have requested us to do so.

Not all personal data is transmitted in encrypted form as standard. Unless expressly agreed otherwise with the customer, accounting data, payroll data and ID cards are transmitted unencrypted.

The following categories of recipients may receive personal data from us:

- Service providers (e.g. IT service providers, hosting providers, suppliers, consultants, lawyers, insurance companies).
- Third parties within the scope of our legal or contractual obligations, authorities, state institutions, courts.

We conclude contracts with service providers who process personal data on our behalf to ensure that they guarantee data protection. Most of our service providers are located in Switzerland or in the EU/EEA. Some personal data may also be transferred to the USA or, in exceptional cases, to other countries worldwide. If data is transferred to countries that do not offer an adequate level of data protection, this is done on the basis of the EU standard contractual clauses of other suitable instruments

## **9. DURATION OF STORAGE OF PERSONAL DATA**

We process and store your personal data for as long as is necessary to fulfill our contractual and legal obligations or for the purposes for which it is processed. This includes the entire duration of the business relationship from the initiation to the execution to the termination of a contract as well as compliance with statutory retention and documentation obligations.

Personal data may need to be stored for a longer period of time in order to assert possible claims against our company, in particular during the statutory limitation period, or if we are otherwise legally obliged to do so or if legitimate business interests require this, for example for evidence and documentation purposes.

As soon as your personal data is no longer required for the aforementioned purposes, it is generally deleted or anonymized, if this is possible. Shorter retention periods of twelve months or less generally apply to operational data such as system protocols and logs.

## **10. DATA SECURITY**

Based on Article 13 of the Swiss Federal Constitution and the data protection provisions of the Swiss Confederation (Data Protection Act, DSG), every person is entitled to protection of their privacy and protection against misuse of their personal data. The operators of these pages take the protection of your personal data very seriously. We treat your personal data confidentially and in accordance with the statutory data protection regulations and this privacy policy.

In cooperation with our hosting providers, we endeavour to protect the databases as well as possible against unauthorized access, loss, misuse or falsification.

We would like to point out that data transmission over the Internet (e.g. when communicating by e-mail) may be subject to security vulnerabilities. Complete protection of data against access by third parties is not possible.



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## 11. OBLIGATION TO PROVIDE PERSONAL DATA

In the course of our business relationship, it is necessary for you to provide the personal data that is required for the initiation and execution of a business relationship and for the fulfillment of the associated contractual obligations. As a rule, there is no legal obligation to provide us with data. However, without this data we will not be able to conclude or execute a contract with you, whether directly with you or with the institution or person you represent. In addition, the use of our website is not possible if certain information to ensure data traffic, such as the IP address, is not disclosed

## 12. YOUR RIGHTS

You have the following rights in connection with our processing of personal data:

- Right to information about the personal data stored by us, the purpose of the processing, the origin and the recipients or categories of recipients to whom personal data is disclosed.
- Right to rectification if your data is incorrect or incomplete.
- Right to restrict the processing of your personal data.
- Right to request the erasure of processed personal data.
- Right to data portability.
- Right to object to the processing of personal data or to withdraw your consent to the processing of personal data at any time without giving reasons.
- Right to lodge a complaint with a competent supervisory authority, where provided for by law.

To assert these rights, please contact us at the address given in section 1.

Please note, however, that we reserve the right to assert the restrictions provided for by law, for example if we are obliged to store or process certain data, have an overriding interest (insofar as we are entitled to invoke this) or need this data to assert claims. We will inform you in advance of any costs incurred.

## 13. CHANGES

We expressly reserve the right to amend this privacy policy at any time.

Last change: 03/24