

## Internal Data Protection Policy

### Introduction

This data protection policy (the "Policy") is adopted by the Board of Directors of Altaïr Finance AG (hereinafter referred to as "the Company") in accordance with Article 716b para. 2 and 3 of the Swiss Code of Obligations (hereinafter: CO), Articles 9 and 21 of the Financial Market Infrastructure Act (hereinafter: FMIA), as well as the Company's articles of association. This Data Protection Policy explains how the company collects data from individuals. Furthermore, this policy describes what the company does with this data when individuals are in contact with our company in the context of a contract or when they communicate with us in any other way.

### Data Collection

In the course of its activities, the company collects and processes personal data of its clients and prospects, as well as individuals related to them (economic beneficiaries, controlling persons, representatives, etc.). Personal data refers to information relating to an identified or identifiable natural person.

There are several types of data that may be processed by the company, including:

- Identification data (e.g., name, first name, date of birth, gender, region of residence, identifier, access data, contract number, identity card/passport number, phone number, email address), authentication data (e.g., specimen signature, password),
- Data related to transactions/investments (e.g., beneficiary or order giver details, communications),
- Contractual data (e.g., data related to a product, a financial service, or a credit request/grant), data related to family status (e.g., marital status, matrimonial regime, heirs),
- Professional data (professional contact details, professional activity, employers),
- Financial data (extract from the debt enforcement register, income, wealth).

### Source, Consent, Legal Grounds

The personal data processed by the company comes directly from the data subject and within the framework of the contractual relationship with the individual (Consent of the declaring person). The data held by us may also come from authorized third parties (e.g., business introducers, competent authorities), or from information research in public databases (e.g., commercial register, land register, research databases...).

### Purpose of Processing

The company processes your data for the conclusion, administration, and execution of contractual relationships. It may also process your data for security and statistical purposes.

#### Communication of Personal Data

##### Disclosure to Third Parties

In the context of its mandates and contract fulfillment, the company may be required to communicate and exchange data with third parties, namely:

- Third parties involved in the relationship or acting on behalf of the client, such as a financial infrastructure operator, a broker, a custodian bank, or an issuer;
- Outsourced service providers, such as IT service providers, hosting, accounting, compliance, or risk management services;
- Monitoring, analysis, or advisory service providers.

To ensure a level of security in compliance with the law, the company subjects its service providers to a contractual obligation to ensure the confidentiality of the personal data they process and ensures compliance therewith.

##### Communication to Authorities

Upon request from public, judicial, or administrative authorities or regulatory or governmental bodies, personal data may be transferred to them. A legal basis or decision will always justify such transfer.

##### Communication Abroad

The company may disclose, transfer, and/or store personal data outside of Switzerland:

- in the context of the conclusion or execution of contracts directly or indirectly related to the business relationship, for example, in the context of outsourcing,
- if such transfer is necessary to safeguard an overriding public interest;
- if such transfer is necessary to enable the company to establish, exercise, or defend against a current or future claim, or to enable the company to deal with an investigation by a public authority, in Switzerland or abroad; or
- in exceptional cases, when such transfer is provided for by applicable regulations (in particular to comply with obligations regarding the reporting of stock market transactions).

If such transfer of personal data is made to a state that does not offer an adequate level of protection of personal data, the company will ensure to obtain the consent of the

client or to put in place appropriate safeguards, including contractual commitments to ensure secure and confidential processing.

### Security and Confidentiality of Data

The company collects and processes personal data in accordance with the Swiss Federal Data Protection Act (LPD) and is subject to confidentiality obligations arising from its field of activity.

### Data Retention

The period for which personal data is retained depends on the applicable legal and regulatory retention period, as well as the purpose of the processing of personal data. In general, the company retains personal data for a period of 10 years from the end of the business relationship. A longer retention period may be justified in situations that require it.

### Rights of Individuals

Any data subject has the following rights concerning their personal data, within the limits of applicable regulations, particularly in case of legal restriction, overriding interest of third parties, or abusive request:

- right to access their personal data;
- right to rectify them when they are inaccurate or incomplete;
- right to object to their processing and/or to request the limitation of their processing;
- right to request their deletion. However, the right to deletion is not absolute and may be restricted depending on overriding interests requiring the continuation of the processing of personal data.

Any data subject may exercise the above-mentioned rights by contacting the company in writing at the address below. The request must be signed and accompanied by a copy of the data subject's identity document.

### Contact

The company is responsible for data processing under this Data Protection Policy, unless otherwise provided by law.

You can contact Altaïr Finance AG for data protection questions and to exercise your rights at the following address (postal address and email):

Altaïr Finance AG 11A St-Oswalds-Gasse CH – 6300 ZUG Email: [ov@altairfinance.com](mailto:ov@altairfinance.com)

### Entry into Force/Amendments

This Policy enters into force on 01.09.2023 This Policy was approved by the Board of Directors on the date below. All amendments to the Policy are subject to the decision of the Board of Directors and communicated internally.

Geneva, 01.09.2023