



DATA PROTECTION POLICY and PERSONAL DATA PROCESSING

1. Introduction

This data protection policy lays down how Investivity SA collects, uses, and processes personal information. It also states why we collect personal information, when and how we disclose personal information to third parties, and how we safeguard your personal information.

If any reference to a website is made, it refers to www.investivity.com

2. Entity acting as data controller

The controller of the data is the legal person which determines the purposes and means of the processing of personal data.

The data controller is Investivity SA, Place de Saint-Gervais 1, 1201 Geneva, Switzerland which can be contacted by email for the purposes of the data protection policy at: contact@investivity.com

The processor of the data is also Investivity SA.

3. What are the purposes of collecting and processing the data?

We collect personal information on the visitors to our website for the purposes of doing marketing and research-related activities to promote our services and products. Moreover we can analyse your use of the website, as appropriate, to determine how we can improve our services.

If you contact us directly via the contact tools available on our website, you consent to sharing more information with us for the purposes of giving you a bespoke answer.

If and when you become a client, personal data is needed for know your client and anti money laundering procedures as well as to fulfil all our regulatory and statutory duties.

4. What personal data do we collect?

The extent of personal data Investivity SA collects depends on how you use our website.

If you choose not to contact us through our website, the personal data we collect are limited to the pages you access on our website.

If you contact us through our website, the personal data we collect consist of part of all of the following: your client type, your country of residence, the amount you consider investing if relevant, your name, your email address, your phone number and your language of preference.



If you become a client of our investment services, we collect additional data such as professional details (job title), financial details (bank account), investment details (your assets), identification (ID card number), business activities, your PEP (politically exposed person) status. We corroborate that information from publicly accessible sources (commercial registers, internet) and any other sources needed to fulfil our obligations according to the Swiss Federal Act on Combatting Money Laundering and Terrorist Financing.

5. How do we collect personal information?

When you are a simple visitor to our website we collect personal information through so called website analytics described hereafter.

When you contact us directly through our website, we collect data that you provide us explicitly and that you consent sharing with us for the purpose of getting in contact and being able to answer you accurately.

When you become a client, we collect more specific data but it is not done through our website.

6. Website analytics

To improve your experience on our website, we may use 'cookies'. Cookies are industry standard and used by most major web sites. A cookie is a small file that a website saves on a computer or other device to store information about you for later use. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do so, you may not be able to use the full functionality of our website.

Investivity SA may provide links to one or more websites operated by third parties. We recommend you read the data protection policies of the respective sites before you provide them with any personal data. Investivity SA is not responsible for the data protection policies of the websites of third parties.

Our website uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage.

By using this website, you consent to the processing of data about you by Google in the manner described in Google's Privacy Policy- external site and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or use the opt-out service provided by Google- external site.

We also use interfaces with social media sites such as Facebook, LinkedIn, Twitter and others. If you choose to "like" or "share" information from this website through these services, you should review the privacy policy of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your visits to our website with some of your other personal information.

7. Transfer of personal data to third parties

If you are a simple visitor to our website, we ensure third parties have no access to your personal data.

We may disclose your personal data if we are expressly authorized by you to do so, or to the extent that such disclosure is required by law. In some cases, external service providers may have access to your personal data, if they provide certain contracted services for us. In such cases, Investivity SA requires contractual assurances from these third parties that they will treat your personal data confidentially.

Investivity SA may disclose more of your personal data when you become a client and for the purposes mentioned below insofar as it is legally permissible or necessary to do so.

Recipient	Purpose	Legal basis
Tax Offices	Tax Administration	Tax Legislation
Courts, other judicial authorities, criminal justice authorities (law enforcement)	Civil or Criminal Proceedings	Swiss Civil Procedure Code, Swiss Criminal Procedure Code
Federal Data Protection and Information Commissioner	Protection of personal data	Federal Act on Data Protection
Auditors	Conducting Audits	Code of Obligations, Federal Act on the Licensing and Oversight of Auditors
FINMA	Financial Markets Supervision	Federal Act on the Swiss Financial Market Supervisory Authority
OAR-G (Self-regulatory organization)	Anti-money laundering and counter terrorist financing	Anti Money Laundering

8. Legal basis for processing

Investivity is entitled to process your personal data if the laws so provide for entering into specific types of contractual agreements. In this case Investivity doesn't need consent for the processing and you may be obliged by law to disclose them to Investivity. In case of non-provision of such data Investivity may not be able to enter into a contract with you (e.g. identification or background checks to identify you and assess your integrity).

Personal data may also be processed upon your consent. Where the data is processed on the consent basis you are entitled to withdraw your consent at any time, without affecting the lawfulness of processing prior its withdrawal.



9. Data retention periods

Investivity will archive personal data for 10 years after the termination of the contract with you or for such longer periods as required by statutory laws. In relation to the direct marketing purpose or consent-based processing Investivity will cease the processing once you unsubscribe from the receiving of any marketing materials or communication or withdraw your consent.

10. Protection of your personal data

Investivity SA takes reasonable precautions to ensure the security of your personal information. We take particular steps to prevent unauthorized access to, or the disclosure or modification of, your personal data. The measures taken by us to protect your personal data include the establishment of firewalls in accordance with industry standards, and password-protected systems.

11. Your rights under data protection law

You have the right to be informed of the source of the personal data, the purpose and methods of processing, the identity of the entity responsible for collecting and processing your personal data, entities or categories of entities with which your personal data are shared, and who may access the data.

You have the right to demand your personal data be updated, corrected or supplemented, as well as its deletion, that it be rendered anonymous or that access to unlawfully processed data be blocked. This also includes data which are unnecessary for the purpose for which they were collected or subsequently processed.

In justified circumstances you have the additional right to object to the processing of all or part of your personal data, even if its collection and use are relevant to the purpose for which they were gathered, but this only applies to personal data collected to send advertising material or for direct marketing, market research or commercial communication surveys.

To exercise the above rights, send an email to contact@investivity.com or a letter by post to: Investivity SA, Place de Saint-Gervais 1, 1201 Geneva, Switzerland.

12. Consent to this data protection policy

By using our website, you agree to the collection and use of your personal data as defined by this data protection policy.