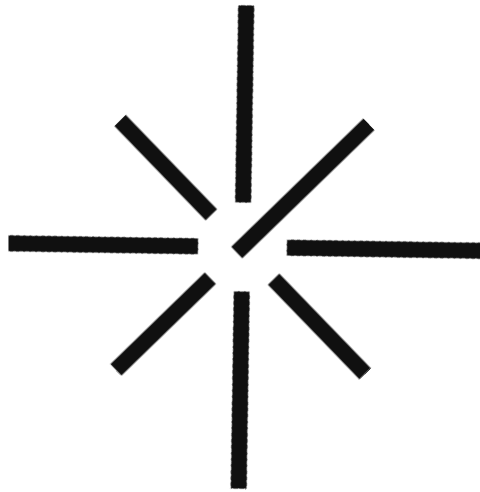


Golden Suisse®



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PRIVACY POLICY

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Sensitivity Confidential

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1. Introduction

Golden Suisse acknowledges the significance of your privacy and understands your concerns regarding the usage of your personal data. This Privacy Policy aims to elucidate how we collect, utilize, disclose, and safeguard your data during your engagement with our products, services, and website. We are committed to upholding your privacy rights and treating your personal information with the utmost care, adhering to pertinent data protection laws.

This Privacy Policy aligns with the Swiss Federal Data Protection Act (FDPA) and other relevant regulations governing data protection in Switzerland. These laws establish guidelines for the lawful and transparent processing of personal data within Switzerland and ensure the protection of individuals' privacy rights. We are dedicated to ensuring that your personal information is processed in accordance with these regulations.

Our objective with this Privacy Policy is to provide you with comprehensive insights into our data practices and to outline your rights concerning your personal information. We encourage you to review this policy attentively to make well-informed decisions regarding your data and privacy. If you have any inquiries or apprehensions regarding this policy or our data handling procedures, please do not hesitate to contact us. Your privacy is of paramount importance to us, and we are committed to safeguarding it.

2. Definitions

Personal Information/Personal Data: Personal information or personal data refers to any information that can be used to identify an individual. This may encompass, among other things, names, addresses, email addresses, phone numbers, and other data that can be directly or indirectly linked to a specific person.

Data Controller: The data controller is the entity or organization responsible for determining the purposes and means of processing personal data. They hold ultimate control over how and why personal data is processed.

Data Processor: A data processor is a party (individual or organization) that processes personal data on behalf of the data controller, acting under the authority and instruction of the data controller.

Data Subject: A data subject is the individual to whom the personal data pertains.

Consent: Consent is the voluntary, informed, and unambiguous agreement of a data subject to the processing of their personal data for a specific purpose. Users are typically asked for their consent before their data is collected or processed.

Data Retention: Data retention refers to the period during which personal data is stored and maintained, as governed by legal requirements and business needs.

Cookies and Tracking Technologies: Cookies and tracking technologies encompass technologies used to collect and store information about user behavior and preferences on websites and online platforms, in compliance with Swiss data protection laws. These technologies may include cookies, web beacons, and similar tools used for analytics, personalization, and advertising purposes.

Data Subject Rights: Data subject rights are the various rights afforded to individuals under data protection laws. These rights typically include the right to access their personal data, the right to rectify inaccuracies, the right to erasure (the "right to be forgotten"), the right to restrict processing, the right to data portability, and the right to object to certain types of processing, such as direct marketing.

Data Controller: Golden Suisse is the controller and responsible for your personal data (collectively referred as "Company", "We", "Us", "our" in this privacy policy, which means that we are responsible under the Federal Act on Data Protection (FADP) for taking proper care of your data. Our contact details are GCB SUISSE AG (Golden Suisse), RATHAUSSTRASSE 14, 6340 BAAR, SWITZERLAND.

Data Protection Officer: We have appointed a Chief Compliance Officer who is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions or complaints related to this Privacy Notice or our privacy practices, or if you want to exercise your legal rights, please contact our Chief Compliance Officer at compliance@goldensuisse.com.

3. The data we collect about you

In compliance with the General Data Protection Regulation (GDPR) and the Swiss Federal Data Protection Act, Golden Suisse is committed to safeguarding the privacy and security of your personal data. We collect diverse forms of personal information through various channels to deliver our services efficiently and improve your overall experience.

These categories of data may encompass:

- **Identity Data:** This category may encompass information such as your name, date of birth, and gender, username or similar identifier, marital status, title, a visual image of your face, tax identification number, national identity cards, passports or other form of identification documents including proof of address such as a utility bill or bank statement.
- **Contact Data:** This could include your email address, billing address, delivery address, home address, work address and telephone numbers.
- **Financial Data:** Examples of financial data may include payment card details, bank account information, and transaction history.
- **Transaction Data:** This category comprises details of the services you have obtained, transactions you've made, and payment history.
- **Technical Data:** Examples of technical data may involve your IP address, device information, browser type and version, time zone setting and location data, browser plug-in types and versions, operating system and platform, and other technology or information stored on the devices you allow us access to.
- **Profile Data:** Profile data may include your username, password, and preferences set on our platform, requests by you for products or services, your interests, preferences, feedback and survey responses.
- **Usage Data:** This category encompasses information about how you use our services and interact with our platform.
- **Marketing and Communications Data:** Examples of marketing and communications data could include your preferences for receiving marketing communications, as well as your communication preferences.

4. How we use your personal data

At Golden Suisse, we are dedicated to handling your personal data with responsibility and transparency, in accordance with the regulations outlined in the General Data Protection Regulation (GDPR) and the Swiss Federal Data Protection Act (FDPA). We will process your personal data:

- (i) where necessary for the performance of a contract or compliance with a legal obligation (e.g., due diligence required by financial institutions before approving an account);
- (ii) for our legitimate interests, such as establishing, exercising, or defending legal claims, preventing fraud, and enhancing our products or services; or
- (iii) where we have obtained your consent, such as for marketing purposes.

Your personal data is utilized solely for specific purposes, including but not limited to:

- Personalizing your experience to better respond to your individual needs.
- Improving our website based on the information and feedback we receive from you.
- Analyzing the use of our site.
- Enhancing customer service by more effectively responding to your requests and support needs.
- Processing transactions, including managing payments, fees, and charges.
- Sending periodic emails, including information and updates related to your requests, as well as occasional company news, updates, promotions, or related product or service information.
- Administering contests, promotions, surveys, or other site features.

Rest assured that we only use your data for the specific purposes for which it was collected. If you have any questions about how we use your personal data or wish to have a clearer understanding of our data usage practices, please feel free to contact us. Your data privacy is of utmost importance to us, and we are committed to respecting your rights.

5. How we share your personal data

We recognize the importance of informing you about how we may share your personal data in order to facilitate our business operations, while always adhering to the applicable data protection laws. It is important to note that certain legal obligations or operational

requirements may necessitate the sharing of your information with other organizations or government agencies.

Below, we have outlined the categories of entities with whom we may share your data:

- companies and organizations that assist us in processing, verifying or refunding transactions/orders you make and in providing any of the Services that you have requested.
- identity verification agencies to undertake required verification checks.
- fraud or crime prevention agencies to help fight against crimes including fraud, money-laundering and terrorist financing.
- anyone to whom we lawfully transfer or may transfer our rights and duties under the relevant terms and conditions governing the use of any of the Services.
- governmental bodies and regulatory authorities, judicial bodies, our associates, agents, attorneys, or other representatives for compliance with legal obligations to which we are subject or for the establishment, exercise, or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

6. Why we process your data

Personal data is collected and processed for one or more of the following legitimate reasons:

- **To Fulfil a Contract:** We may collect personal data, including contact details, date of birth, and transactional information, as part of our contractual agreement with you. This information is necessary to provide and exchange our products and services, including collaborating with third parties as required.
- **To Comply with Legal Obligations:** In cases where we are legally obligated, we may collect and process all personal information. This is essential for investigating suspicious activities on your account, including addressing concerns related to fraud, money laundering, and other financial crimes. Additionally, it allows us to respond to complaints and legal claims in accordance with regulatory requirements.

- **For Legitimate Interests:** We may collect and process personal information when it aligns with our legitimate business interests. This could include developing new products and services or marketing new and existing products that may be of interest to you, that you have opted to receive marketing emails from us. Legitimate interest, in this context, refers to our commercial or business rationale for utilizing your data.
- **With Your Consent:** When you have provided explicit consent, we may collect and process all personal data for marketing purposes. This allows us to market both new and existing products that may align with your interests.

Please note that we may process your personal data based on more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data.

7. Where we collect your personal information

We aim to be transparent about the circumstances in which we collect your personal information. Your data may be obtained from the following sources:

- **Data You Provide:** We may collect personal information when you voluntarily provide it to us, including but not limited to when you apply for our products and services, engage with our customer support, interact with our website or app, participate in competitions or promotions sponsored by us or third parties, report issues with our website, or communicate with us through emails and letters. Additionally, your feedback in customer surveys may also be collected.
- **Data for Service Usage:** Information related to the amount, frequency, type, location, origin, and recipients of transactions is collected for the effective use of our services. This may include payment and transaction data, profile data, and usage data. We gather this data from the devices you use to access these services, such as computers and mobile phones, with the help of cookies.
- **Data from Trusted Third Parties:** In some instances, we may obtain data from third parties with whom we work. These sources may include card schemes, credit reference agencies, fraud prevention agencies, and government or law enforcement agencies. The data obtained from these entities is used to ensure the

security and integrity of our services and to meet legal and regulatory requirements.

We are dedicated to safeguarding your privacy and ensuring that your personal information is collected only from reliable sources and for legitimate purposes. If you have any questions or seek further clarification about how and where we collect your personal data, please do not hesitate to contact us. Your trust in our data handling practices is of utmost importance.

8. Cookies

A cookie refers to a small piece of data stored on the hard drive of a website visitor, containing visitor-specific information that can only be accessed by the server responsible for placing the cookie on the visitor's hard drive. Golden Suisse utilizes "cookie" technology, employing cookies on its website for various purposes, including storing personal data, authenticating the client as a site user, and enhancing security measures.

Most web browsers come with default settings that allow them to accept cookies. Clients have the option to configure their browser preferences in several ways, including:

- Blocking cookies entirely.
- Deleting cookies upon exiting the website.
- Receiving notifications before receiving a cookie, allowing them to decide whether to accept it or not.
- Limiting subsequent cookie retrieval by the website.

Moreover, there are numerous privacy-enhancing tools and software available for purchase that empower users to selectively identify and block cookies. It is important to note that some websites, particularly those requiring authorization, may require the use of cookies. In such cases, users who choose not to accept cookies may encounter difficulties accessing these websites where cookie usage is mandatory.

9. International transfer of data

The information we gather from you may be transferred to and stored in a location outside of the European Economic Area (EEA). It may also be handled by personnel operating outside the EEA who are employed by us or one of our suppliers. These personnel may

be involved in activities such as managing your payment information, and offering support services.

By providing your personal information, you consent to this transfer, storage, or processing. We will take all reasonable measures to ensure that your data is handled securely and in accordance with this privacy policy.

Whenever we transfer your personal data outside of the EEA, we ensure that a comparable level of protection is maintained. This can be achieved by implementing one of the following safeguards, as mandated by Swiss data protection laws:

- Ensuring that the country receiving your personal data has been deemed by the Swiss Federal Data Protection and Information Commissioner (FDPIC) to provide an adequate level of protection for personal data.
- Establishing a specific contract, approved by the FDPIC, which includes provisions to safeguard the processing of personal data. This contract may include the use of Standard Contractual Clauses approved by the FDPIC.

These measures ensure that your personal data continues to receive adequate protection when transferred outside of the EEA.

10. Security

We shall process your personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage. We do this by using appropriate technical or organizational measures, for example, all information you provide to us is stored on our secure servers and our employees are required to comply with all applicable data protection laws.

We employ organizational, administrative, technical, and physical security protocols to protect your Personal Data and ensure its prompt, precise, and comprehensive processing. We mandate that Service Providers also uphold the security of your Personal Data and utilize it solely for the purposes we have defined.

11. Direct Marketing

Golden Suisse confirms that direct marketing activities will not be conducted as part of its operations. This decision aligns with our commitment to respectful and compliant business practices, focusing instead on tailored client engagement and service excellence.

12. Retention of data

Golden Suisse is dedicated to retaining your data only for the duration necessary to fulfill the purposes for which it was collected. We will not retain your personal data for longer than necessary, considering the initial reason(s) for its collection. For instance, personal account information is retained for at least five years from the closure of an account or termination of a business relationship. This ensures compliance with legal and regulatory requirements and allows us to address any disputes or concerns that may arise, thus serving our legitimate interests. Should there be a need to retain your information for a longer period to meet regulatory or legal obligations or for our legitimate business interests, such as responding to queries, complaints, or combating fraud and financial crime, we will do so accordingly.

13. Query or Complaint

If You have questions about this privacy statement or how Your Personal Data is handled or wish to make a complaint or exercise your rights, you can email us at support@goldensuisse.com.

14. Your legal rights

We believe in transparency and your rights concerning your personal data. Under data protection laws, you have specific rights related to your personal data. These include:

- **Right to Access:** The right to access the personal data we hold about you. Upon request and verification of your identity, we will send you a copy of the personal data we hold about you.
- **Right to be informed:** You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we are providing you with the information in this Policy.

- **Right to Rectification:** If you believe the personal data, we hold about you is incorrect, you have the right to request its correction.
- **Right to erasure:** This is also known as 'the right to be forgotten'. You have the right to demand erasure of your Personal Information without undue delay, however, we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you.
- **Right to Object or Restrict Processing:** You can request the restriction of your personal data's use in certain circumstances:
 - If you believe the data is inaccurate.
 - If you think it has been used unlawfully, but you do not want it deleted.
 - If it is no longer relevant, but you want us to retain it for legal claims.
 - If you are awaiting confirmation to continue using it, but you have already asked us to stop its use.
- **Right to withdraw consent:** That means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- **Right to Lodge a Complaint:** You have the right to lodge a complaint with the Federal Data Protection and Information Commissioner (FDPIC), Switzerland's supervisory authority for data protection matters. You can contact them at:

Federal Data Protection and Information Commissioner (FDPIC)

Website: <https://www.edoeb.admin.ch/>

Postal Address: Feldeggweg 1, CH - 3003 Bern

Telephone: +41 58 462 43 95; Fax: +41 58 462 99 96

It's essential to acknowledge that data collection may be obligatory under legal regulations or contractual terms. Failure to provide requested data could result in delays or hinder our ability to fulfill our obligations. In certain circumstances, it may lead to the termination of a product or service agreement you hold with us.

Should you wish to exercise any of these rights or if you have inquiries, please do not hesitate to contact us. Upholding your rights is fundamental to our commitment to data protection and privacy.