



General Data Protection Regulation (GDPR)

Privacy Notice

Urban Advisors SA processes information and personal data relating to you and/or any Related Person of yours (Related Person(s) and you, together the hereinafter "Data Subject(s)"). In substance, we do so in connection with our existing and/or prospective business relationships, including your use of our websites (together hereinafter the "Business Relationship"). We can do so either as controller or as joint controller (hereinafter the "Controller").

A "Related Person" means an individual or entity whose information you or a third party provides to us and/or which otherwise comes to our knowledge in connection with our Business Relationship. A Related Person may include, but is not limited to, (i) any director, officer or employee of a company, (ii) a trustee, settlor or protector of a trust, (iii) any nominee or beneficial owner of an account, (iv) a substantial interest owner in an account, (v) a controlling person, (vi) a payee of a designated payment, or (vii) any representative(s) or agent(s) (e.g., with a power of attorney or a right of information on an account).

In this context, we ask that you liaise with and transmit to any and all of your Related Persons this Privacy Notice, respectively the information contained therein.

For any questions you may have in relation to this Privacy Notice, your Controller, or more generally the processing of your (or your Related Persons') personal data, you may contact your relationship manager with us, in writing at the following address:

Urban Advisors SA, Rue du Mont-Blanc 4, 1201 Geneva, Switzerland

Personal data & process

We are subject to certain confidentiality and/or secrecy obligations, e.g., arising under data protection, contract, professional or banking secrecy, as the case may be. Personal data we process are also subject to said obligations.

This Privacy Notice deals with the way we process (i.e., collect, use, store, transmit or otherwise handle or process, collectively defined hereinafter as the "Processing" or "Processing Operations") personal data. This Privacy Notice does not replace, and is subject to, our applicable contractual terms and conditions.

We may conduct our Processing Operations either directly or indirectly, through other parties which process personal data on our behalf (hereinafter the "Processors"). We are responsible only for the Processing of personal data as per this Privacy Notice.

"Personal data" include any information that enables one to identify directly (e.g., first name, surname) or indirectly (e.g., passport number or data combination) a natural person.

Personal data of Data Subjects we process may include:

- Identification data, e.g., names, addresses, telephone numbers, email addresses, business contact information;
- Personal characteristics, e.g., date of birth, country of birth;

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- Professional information, e.g., employment and job history, title, representation authorities;
- Identifiers issued by public bodies, e.g., passport, identification card, tax identification number, national insurance number, social security number;
- Financial information, e.g., financial and credit history information, bank details;
- Transaction / investment data, e.g., current and past investments, investment profile, investment preferences and invested amount, number and value of shares held, role in a transaction (seller / acquirer of shares), transaction details;
- Cookie information, e.g., cookies and similar technologies on websites and in emails (please see also our Cookie Policy).

Purposes and legal bases on process of personal data

We collect and process personal data for the purposes (hereinafter the "Purposes") and based on the legal bases set forth herein.

As a general comment, we essentially base our Processing on (i) the performance of a contract to which you are a party or a Related Person is related (as well as to take precontractual steps at your or a Related Person's request), (ii) our obligation to comply with a legal or regulatory obligation, (iii) the pursuit of our legitimate interest (including that of other Urban Advisors SA entities or partners) and (iv) the performance of a task carried out in the public interest (e.g., to prevent or detect offences).

More specifically, we collect and process personal data as necessary for the performance of a contract to which you are a party and/or a Related Person is related, which includes the following Processing Operations (which may also be based upon other lawful bases):

- the opening and management of your and/or Related Person's account or Business Relationship with us, including all related operations for your identification;
- any other related services provided by any service provider of the Controller(s) and Processors in connection with our Business Relationship;
- the management, administration and distribution of investment funds, including any ancillary services related to these activities; or
- the processing of subscription, conversion and redemption requests in investment funds, as well as for maintaining the ongoing relationship with respect to holdings in such investment funds.

We also collect and process personal data in relation to compliance with legal and regulatory obligations to which we are subject, including to:

- provide offering documentation to Data Subjects about products and services;
- comply with legal obligations relating to accounting, compliance with legislation on markets in financial instruments;
- carry out any other form of cooperation with, or reporting to, competent administrations, supervising authorities, law enforcement authorities and other public authorities (e.g., in the field of anti-money laundering and combatting terrorism financing ("AML-CTF")), for the prevention and detection of crime under tax law (e.g., reporting of name, address, date of birth, tax identification number (TIN), account number and account balance to the tax authorities under the Common Reporting Standard ("CRS") or Foreign Account Tax Compliance Act ("FATCA") or other tax legislation to prevent tax evasion and frauds as applicable);



- prevent fraud, bribery, corruption and the provision of financial and other services to persons subject to economic or trade sanctions on an on-going basis in accordance with our AML-CTF procedures, as well as to retain AML-CTF and other required records for screening purposes;
- deal with active intra-group risk management pursuant to which risks in terms of markets, credit, default, processes, liquidity and image as well as operational and legal risks must be identified, limited and monitored;
- record conversations with Data Subjects (such as telephone and electronic communications), in particular to document instructions or detect potential or actual frauds and other offences.

The foregoing Processing Operations may rely on other lawful bases and eventually do substantially rely on the performance of a task carried out in the public interest.

Furthermore, we may process personal data in relation to legitimate interests we pursue in order to:

- assess certain characteristics of the Data Subjects on the basis of personal data processed automatically (profiling) (see also Section Profiling & automated decision making below);
- develop our Business Relationship with you;
- improve our internal business organization and operations, including for risk management;
- use this information in the Urban Advisors SA entities or partners for market studies or advertising purposes, unless Data Subjects have objected to the use of their personal data for marketing;
- assess our risk and take related business decisions in case of risk management;
- communicate personal data to other Urban Advisors SA entities or partners, in particular to guarantee an efficient and harmonized service and inform Data Subjects about the services proposed by the Urban Advisors SA entities or partners;
- establish, exercise and/or defend actual or potential legal claims, investigations or similar proceedings;
- record conversations with Data Subjects (such as telephone and electronic communications) to verify instructions, enforce or defend our interests or rights, assess, analyze and improve the quality of our services, train our employees and manage risks.

To the extent one or more of our Processes of personal data presupposes that you give your prior consent thereto, we will reach out to you and ask for your consent in due time. The provision of personal data may be mandatory, e.g., in relation to our compliance with legal and regulatory obligations to which we are subject. Please be aware that not providing such information may preclude us from pursuing a Business Relationship with, and/or from rendering our services to you.

Profiling & automated decision making

We may assess certain characteristics of the Data Subjects on the basis of personal data processed automatically (profiling), in particular to provide Data Subjects with personalized offers and advice or information on our products and services or those of our affiliates and business partners. We may also use technologies that allow identifying the level of risks linked to a Data Subject or to the activity on an account.



Furthermore, we generally do not use automated decision making in connection with our business Relationship and/or Data Subjects. Should we do so, we shall comply with applicable legal and regulatory requirements.

Sources to collect data

To achieve the Purposes, we collect or receive personal data:

- directly from the Data Subjects, e.g., when contacting us or through (pre-)contractual documentation directly sent to us; and/or
- indirectly from other external sources, including any publicly available sources (e.g., UN or EU sanctions lists, etc.), information available through subscription services (e.g., Bloomberg, etc.) or information provided by other third parties.

Share personal data with third parties

If necessary or useful to achieve the Purposes, we reserve the right to disclose or make accessible the personal data to the following recipients, provided this is legally or otherwise authorized or required:

- public / governmental administrations, courts, competent authorities (e.g., financial supervisory authorities) or financial market actors (e.g., third-party or central depositories, brokers, exchanges and registers, etc.);
- entities to which we belong or third-party Processors that process personal data on our behalf and/or to which we outsource certain tasks of ours (outsourcing);
- auditors or legal advisors.

We undertake not to transfer personal data to any third parties other than those listed above, except as disclosed to Data Subjects from time to time or if required by applicable laws and regulations applicable to them or by any order from a court, governmental, supervisory or regulatory body, including tax authorities.

Personal data transferred outside of our jurisdiction of incorporation

In relation to our Business Relationship, we may disclose, transfer and/or store personal data abroad (hereinafter "International Transfer") (i) in connection with the conclusion or performance of contracts directly or indirectly related to our Business Relationship, e.g., a contract with you or with third parties in your interest, (ii) when the communication is necessary to safeguard an overriding public interest, or (iii) in exceptional cases duly foreseen by applicable laws (e.g., disclosures of certain trades made on an exchange to international trade registers).

International Transfers may include the transfer to jurisdictions that (i) ensure an adequate level of data protection for the rights and freedoms of Data Subjects as regards to Processing, (ii) benefit from adequacy decisions as regards their level of data protection (e.g., adequacy decisions from the European Commission or the Swiss Federal Data Protection and Information Commissioner) or (iii) do not benefit from such adequacy decisions and do not offer an adequate level of data protection. In the latter case, we will ensure that appropriate safeguards are provided, e.g., by using standard contractual data protection clauses established by the European Commission.



Should you wish to have further information as regards International Transfers or appropriate safeguards, you may of course contact our Data Protection Officer (see Section Privacy Notice above).

Your rights in connection with data protection

You have the right, subject to applicable local data protection legislation, to:

- request access to, and receive a copy of, the personal data we hold;
- if appropriate, request rectification or erasure of the personal data that are inaccurate;
- request the erasure of the personal data when the Processing is no longer necessary for the Purposes, or not or no longer lawful for other reasons, subject however to applicable retention periods (see Section Timing of data kept or stored below);
- request a restriction of Processing of personal data where the accuracy of the personal data is contested, the Processing is unlawful, or if the Data Subjects have objected to the Processing;
- object to the Processing of personal data, in which case we will no longer process the personal data unless we have compelling legitimate grounds to do so (e.g., the establishment, exercise or defense of legal claims);
- receive the personal data in structured, commonly used and machine-readable format (data portability right);
- obtain a copy of, or access to, the appropriate or suitable safeguards which we may have implemented for transferring the personal data outside of the European Union or Switzerland;
- complain with our Data Protection Officer (see Privacy Notice Section above) in relation to the Processing of personal data and, absent a satisfactory resolution of the matter, file a complaint in relation to the Processing of personal data with the relevant data protection supervisory authority.

Even if a Data Subject objects to the Processing of personal data, we are nevertheless allowed to continue the same if the Processing is (i) legally mandatory, (ii) necessary for the performance of a contract to which the Data Subject is a party, (iii) necessary for the performance of a task carried out in the public interest, or (iv) necessary for the purposes of the legitimate interests we follow, including the establishment, exercise or defense of legal claims. We will not, however, use the Data Subject's personal data for direct marketing purposes if the Data Subject asks us not to do so.

Subject to the limitations set forth herein and/or in applicable local data protection laws, you can exercise the above rights free of charge by contacting our Data Protection Officer.

Timing of data kept or stored

As a matter of principle, we retain personal data for as long as we need the same to achieve the Purposes. By the same token, we will delete or anonymize personal data (or equivalent) once they are no longer necessary to achieve the Purposes, subject however (i) to any applicable legal or regulatory requirements to store personal data for a longer period, or (ii) to establish, exercise and/or defend actual or potential legal claims, investigations or similar proceedings, including legal holds, which we may enforce to preserve relevant information.

As per 1st July 2023