

## Protection and Processing of Personal Data

This statement regarding the protection and processing of personal data is issued in accordance with the Federal Act on Data Protection (FADP). The purpose of this statement on data protection and processing is to describe how STANHOPE CAPITAL (SWITZERLAND) SA ("SCSSA") collects, processes, and protects the personal data of (i) SCSSA clients ("Clients") and (ii) individuals or entities for whom personal data concerning natural persons is provided to us by the Client or becomes known to us in connection with the services we provide ("Related Persons").

Related Persons may include (i) a director, officer, authorized signatory, or employee of a company, (ii) a trustee, settlor, or protector of a trust, (iii) a beneficial owner of the Client's assets, (iv) a controlling shareholder, (v) a representative or attorney of the Client, (vi) one or more family members of the Client, or (vii) any other individual or entity who has a relationship with the Client that is relevant to the business relationship we have with the Client. This statement on the protection and processing of personal data also aims to inform the Client and Related Persons of their rights.

### 1. Data Controller

The data controller of personal data is:

Mr David Cosme

STANHOPE	CAPITAL	(SWITZERLAND)	SA
Square	de	l'Académie	5
1205 Geneva			

For any questions about the processing of your personal data, you can contact the data controller by registered mail or at the following email address: [dcosme@stanhopecapital.com].

### 2. Data Processed

In general, we process personal data (i.e., data that allows the identification of natural persons, directly or indirectly) that you or third parties provide to us due to the business relationship between us and the related services. The same applies to the data we collect ourselves. Personal data may be collected and processed in the following situations:

#### a) Contacting Us

We collect and process your personal data (which you provide) for the purpose of receiving, reviewing, providing, and/or responding to your requests for a particular service you seek when contacting us in writing or orally (e.g., by letter, email, or telephone). This may include names, contact details, or information about the role of the person concerned within the company or organization you (or your respective contacts) work for or on whose behalf you (or they) contact us.

#### b) Contract Preparation and Conclusion

We collect and process the information necessary for the conclusion of a contract with SCSSA, which may include identity data and/or that of any relevant contacts, associated contact details, as well as other information you provide to SCSSA or that we collect from public sources (e.g., public registers, know your customer (KYC) search engines, or websites) or third parties (e.g., authorities or depositary banks). Depending on the business relationship

between us, additional personal data may be collected and processed, including data required for KYC (know your customer) checks that SCSSA is obliged to carry out.

#### c) Contract Management and Execution

We collect and process personal data to manage and execute the contractual relationship between us, including fulfilling our contractual obligations and providing related services to Clients and other counterparties. In this context, personal data is primarily provided by the Client (or other persons involved, such as Related Persons), but we may also collect data from public sources (e.g., public registers, KYC search engines, or websites) or third parties (e.g., authorities or depositary banks). Personal data may include names, contact details, or information about the role of the person concerned within the company or organization you (or the Related Persons) work for or on whose behalf you (or they) contact SCSSA. Depending on the contractual relationship between us, additional personal data may be collected and processed as necessary for the management, conclusion, and execution of the contract with the Client (including, but not limited to, KYC checks that SCSSA is required to perform).

### **3. Data from Third Parties**

Any personal data of related Persons or other third parties that you provide constitutes a processing of personal data for which you act as an independent data controller, assuming all the associated obligations and responsibilities. In this context, it is your responsibility to ensure that any individual concerned by the personal data you provide has been duly informed about the processing of their personal data by us and, if required, has consented to such processing.

### **4. Purpose of Processing**

With respect to the purpose of processing personal data, it primarily allows us to implement pre-contractual measures and/or execute any business relationship between us, including providing the services you request, documenting them, and invoicing them. We also process personal data to comply with applicable laws and regulations and to be able to communicate with you or other contacts. Processing personal data is also necessary for our legitimate interest in enabling SCSSA to respond to your service request and/or improve our relationship with the Client. The processing may also be based on your explicit consent (with the understanding that in such a case, consent can be revoked at any time with effect for the future).

### **5. Recipients**

To achieve the purposes of processing, it may be necessary for us to transmit personal data to the following categories of recipients: SCSSA affiliates established in the United Kingdom, service providers for the management of IT systems and communication networks, cloud providers established in the United Kingdom, banking institutions, as well as relevant authorities and administrations. Depending on the nature of the services related to the business relationship between us and/or at your instruction, it may also be necessary to transmit this data to recipients (including Clients, depositary banks, or authorities) who process personal data in other countries, including those that do not guarantee a level of protection comparable to Swiss law. In such cases, we will only do so based on consent or standard contractual clauses. The same applies if the transmission of data is essential for the execution of our business relationship with you or to assert legal claims.

### **6. Duration of Processing**

Personal data is processed as long as necessary to fulfill the purposes of processing, subject to a longer retention period required to comply with statutory retention periods, safeguard legitimate interests (such as documentation and evidence purposes), as long as there is an overriding private or public interest, or as long as claims can be made against us or technical safeguards are necessary. If no legal or contractual obligation opposes it, the data will be deleted or anonymized at the expiration of the retention period within our usual procedures.

## **7. Data Storage Location and Security**

We take appropriate and proportionate measures to protect personal data against loss, unauthorized modification, or unlawful access by third parties. Please note that we use external IT service providers or cloud providers with servers [in Switzerland and/or the United Kingdom]. We may use certain IT services or communication tools that may involve data security risks (e.g., email and video conferencing). If you would like us to take specific security measures, please inform us in advance.

## **8. Rights of the Data Subjects**

Data subjects have the right to obtain information about the personal data recorded about them, to know its purpose, to correct, delete, restrict its processing, to object to it, and to contact a supervisory authority. They also have the right to data transmission or portability. Please note, however, that these rights are subject to conditions and exceptions. To the extent permitted or required by law, certain requests may be denied. Thus, we may or must retain personal data or continue processing it in some way for legal reasons, despite a request for deletion or restriction of data processing.

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This statement provides information on the nature, extent, and purpose of the data processed by SCSSA. The company reserves the right to unilaterally amend the content of this statement at any time without prior notice. Please contact the data controller for any questions regarding this statement or data protection at SCSSA.