



Privacy Notice for EAM

Our values

We use appropriate protection measures to guarantee the security of your personal data.

We will inform you when we need to share your information with other entities in order to provide you with the products and services you require. Your personal data will only be used for the specific purposes agreed with you.

We may sometimes be required by law to share your personal data with Swiss or foreign authorities, in particular through international requests for mutual assistance.

You can always contact us to find out how we process your personal data.

1. Personal data we process:

As part of our services, we, Penta Asset Management, only collect the personal data we need:

1.1. Client data

- The information that you provide to us directly during an initial meeting:
 - a. Identity data (such as surname(s), first name(s), age, date of birth, gender)
 - b. Contact details (such as home address, telephone number(s), e-mail address)
- Information collected when you, the client, mandate us as a financial services provider and which is requested by financial institutions on delegation, for example when you open an account with our help in addition to giving us a management or advisory mandate :
 - a. Personal data (surname(s), first name(s), date of birth, gender, nationality(ies), tax ID number, tax status, etc.).
 - b. Identification documents (with photo, including passport and residency permit).
 - c. Contact details (home and correspondence address, e-mail address, telephone number(s), etc.).
 - d. Information about your professional situation (education, career path and current occupation).
 - e. Information about your family's situation.
 - f. Information relating to your economic background (origin and source of funds and assets, existing investments in real estate and personal property, tax returns, bank details, etc.), in particular to comply with anti-money laundering regulations.
 - g. Information required to assess your knowledge, experience and objective/subjective capacity to assume financial risks in connection with the execution of mandates, changes in investor category and to establish an investment strategy.
 - h. Other information needed to fulfil the mandate.
- In accordance with anti-money laundering regulations and international sanctions, we may have to collect information from the client and from third parties, in particular from:
 - a. Databases with publicly available data or on paid subscription
 - b. The business introducer who referred the client.

1.2. Data on third parties

- When our business relationship is established or during the course of the relationship, you, as a customer, may be asked to provide personal data relating to third parties.
 - a. Family, including the relationship holder's spouse, descendants, parents or legal guardian.
 - b. The beneficiaries, protector or settlor of a trust where the trustee is the holder of the relationship.
 - c. The beneficial owner of the relationship and the shareholders (or other controlling interest).
 - d. The premium payer and beneficiaries of insurance policies where the policyholder is the client.
 - e. Counterparties in financial or commercial transactions.



- f. Contacts and/or recipients of correspondence.
 - g. The designated person in case of absence of contact.
 - h. Any person whose name is required to respond to requests for clarification of the background to a relationship or transaction.
 - i. The proxy.
- o It is your responsibility to inform third parties when you share with us data about them and to inform them of the existence of this notice.

2. Why we collect your personal data:

We only use your information for the following purposes:

- o **We need to do this as part of the performance of our contract** with you, for example in connection with the mandates you have given us to manage an investment portfolio or to provide investment advice.
- o **We have a legal obligation** to do so, in particular in order to comply with legal obligations relating to financial services, the fight against the financing of terrorism and compliance with international sanctions.
- o We have a **legitimate and overriding interest** in processing your personal data. This includes storing data for audit purposes, security measures or complaints handling.
- o You have given **your consent** for a specific purpose. You may withdraw it at any time, unless a legal exception applies.

3. We may share your personal information with partners and authorities

To meet our commitments to you, we share your information with third party organisations only when necessary:

- o Banks or other custodians with whom you have opened a custody account.
- o Essential IT services, including data management and storage services.
Analysis and search engine operations to optimise our website.
- o Third parties with whom you have a direct contractual relationship or to facilitate your acquisition of products and services from a third party.
- o Delegates in the performance of the contract.
- o Relationship introducer.
- o IT solution provider for the automated sending of electronic communications.

We may be required by law to share information with authorities, in particular the Swiss Financial Market Supervisory Authority (FINMA), the courts and any Swiss or foreign regulatory, criminal, civil or tax authority, by means of international mutual legal assistance.

There may be occasions when we, or third parties instructed by us, need to transfer part of your personal data outside Switzerland, where data protection laws may be different. The hypotheses are limited, and we will always take steps to ensure that any such transfer is carefully managed to protect your rights and to ensure that adequate safeguards are in place. To send our weekly and quarterly communications, we use the services of an automated messaging platform provider based in the USA, which complies with the EU and Swiss regulations on data protection.

When we collect personal data on behalf of the custodian of your assets, we are acting solely as a data processor. The custodian will be responsible for communicating with you how it handles your personal data.

4. How we protect your information

We use technical, administrative and physical security measures to protect your data against unauthorised access and inappropriate use. We also ensure that we can restore your data in the event that it is corrupted or lost in a crisis situation. Where appropriate, we use encryption or other security measures. However, despite our reasonable efforts, no security measure can be perfect or impenetrable.



5. Information retention period

We retain your personal data for as long as is necessary for the purposes for which it was provided. The length of time will vary depending on the applicable law and our legitimate interest in retaining the information, for example for follow-up communications or to manage potential disputes. Information relating to a specific transaction is retained for at least 10 years after the end of the calendar year in which the transaction took place. Information such as verification documents may need to be renewed on a regular basis and historical data may also be retained as evidence of our due diligence throughout the relationship and for at least 10 years after the relationship has ended.

6. Your rights

You have the right to request access to your personal data and to obtain a copy of the information we hold about you. We may ask you for additional information in order to verify your identity and assess your legitimacy.

Within the limits of applicable law, you may ask us to amend or delete any personal data that you consider to be out of date. You also have the right to object to the processing of your personal data as long as there is no legal obligation or legitimate interest to retain this data.

To exercise the above rights, you can contact us by sending an e-mail to info@penta-am.ch, by phone at +41 22 819 60 50 or by writing to us at Rue du Vieux-Collège 10bis, 1204 Geneva.

You can refuse marketing communications at any time by contacting us by email at info@penta-am.ch.

If you believe that your personal data has been processed incorrectly or if you are not satisfied with the way we have handled your request concerning the processing of personal data, you have the right to lodge a complaint. You should seek advice from the supervisory authority of the country in which you reside.

7. How to contact us

If you have any questions or comments about this privacy notice, please contact us using the following details:

Penta Asset Management SA, Rue du Vieux-Collège 10bis, 1204 Geneva, Switzerland

Tel : +41 22 819 60 50 / Email : info@penta-am.ch