

Privacy Notice

Last update, 30 March 2023

We, Swise AG ("Swise," "we," "us," or "our") care about the protection and confidentiality of your personal data and are committed to comply with data protection laws and regulations.

This Privacy Policy describes our policies for collecting, using, and disclosing your personal information when you use the Swise services, including but not limited to swise.com ("Service"), as well as the choices you have associated with such data.

The following information provides an overview of how we process your personal data and your rights under data protection laws and regulations.

All your data will be held and used in accordance with EU General Data Protection Regulation (GDPR) the Swiss Federal Act on Data Protection (FADP), and any other applicable legal data protection laws and regulations.

1. Who is responsible for your personal data and whom can you contact?

Swise is the entity responsible for the processing of your personal data. For any question that you may have in connection with the processing of your personal data, you may contact us at the following address:

Swise AG
Technoparkstrasse 1
8005 Zurich
Switzerland
Email: privacy@swise.com

2. Information we may collect from you

We may collect and receive information about users of our Service ("users," "you," or "your") from a variety of sources, including (i) information you supply when registering to use our Service, (ii) your usage of the Service, and (iii) third-party websites, services, and partners. In order to provide and enhance the Service, we gather a variety of information types.

2.1 Information you give us

2.1.1. Signing up for a user account

When opening your customer account for the first time, you will be asked for your country of residence, full name, date of birth, email address and to determine a password. To verify your account, a link will be

sent to the email address provided which you will need to click on. To log in to your customer account, you will need your email and password.

2.1.2. Customer segmentation survey

In order to be able to make use of our Service, you will be required to complete a questionnaire to determine if you meet the qualifications to invest in private markets, in accordance with applicable legal and regulatory requirements. The following personal data will be collected from you:

- Professional status, profession and employer of record
- Educational, professional and investment experience in private markets
- Income, financial assets and source of wealth
- Information on your capacity to evaluate the merits and risks associated with private markets

2.1.3. Collection and processing of personal data to make use of our Service

Should you decide to make use of our Service, you will be required to provide further personal data required to prepare the contractual documentation and to meet legal and regulatory requirements. The following data will be collected from you:

- Place of origin
- Politically Exposed Person (PEP) status
- Address, postal code, city, country
- Mobile number
- Tax residence and Taxpayer Identification Number (or equivalent)
- Status US person / US reference (US tax liability)
- Bank account details
- Confirmations that you are not acting for the account or benefit of a third person

2.1.4. Disclosure of your data for the purpose of identification

In order to meet the requirements of Know Your Customer (KYC) and Anti-Money Laundering (AML) regulations, we need to verify your identity.

The ID verification process is conducted by Sum and Substance Ltd (“SumSub”), global identity verification solutions provider. In the course of the identification process, a SumSub agent will conduct a video call with you to confirm your identity. The following personal data is thus collected from you:

- Copy of your identification document (passport, ID)
- Details of your identification document (type, number, date of issue, photo)
- Photo and video recording (s) of you (“selfie”)

2.1.5. Contract signing

Your contracts with Swise are signed electronically through DocuSign, Inc, global e-signature solutions provider. Once the contracts have been signed by all counterparties, the documents will be available to you on our platform.

2.1.6. Communications

If you contact us, we may collect additional information about you, including your name, email address, phone number, the contents of any messages and/or attachments you send us, as well as any other information you elect to provide. Additionally, we may receive a notification when you open an email from us.

2.1.7. Referring others

If you choose to refer someone to our Service (e.g., by sharing a link or providing us with information), we may collect their email address so that we can send them a referral or promotional code to sign up for our Service.

At the time we request your personal information, we will make it clear what information is being requested and why it is being requested.

2.2 Information we collect about you

We may also collect information regarding the manner in which the Service is accessed and utilized. This information may contain details such as:

- your computer's Internet Protocol (IP) address, your location data, login data, browser type and version, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Service;
- information about your visit, including the full URL clickstream to, through and from our Service (including date and time); pages you viewed or searched for;
- page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

We also collect information about your use of our website. This usage data is collected via cookies and similar tracking technologies. We use this usage data for (i) web analytics, (ii) improvements to our services and our website, (iii) usability improvements.

This data processing is based on your consent to the use of cookies on our website. You can revoke this consent at any time (e.g. via your browser settings for cookies) with effect for the future and free of charge.

2.3 Information we receive from third parties

We work with third parties and may also receive publicly available information about you from them. We share your information with fraud prevention agencies who will use it to prevent fraud and money laundering as well as verify your identity. If we detect fraud on your account or application, you may be denied access to certain services or employment opportunities.

3. How We Use This Information

We utilize the data we collect in a number of ways, including:

- to carry out our obligations arising from any contracts you and we have entered into;
- in order to provide, operate, maintain, enhance, and customize our Services;
- to develop new products, services, features and functionalities;
- to conduct analytics in order to understand how you use our Services so that we can provide the best possible customer service;
- to make suggestions, recommendations, and provide you with information regarding our Service that we believe may be of interest to you;
- to communicate with you, either directly or through one of our partners, to provide you with Service-related news, event information, updates, and other information;
- to measure or understand the effectiveness of advertising we serve to you, and to deliver relevant advertising to you;
- as part of our efforts to ensure the safety and security of our Service;
- to guarantee that content from our Service is displayed in the most effective manner for you and your computer; and
- for any purposes required by law such as for tax, legal, reporting and auditing obligations.

4. Disclosure of Your Informations

We may share your personal information with the corporate group of Swise and other third parties, such as:

- business partners, suppliers, regulatory bodies, and sub-contractors for the performance of any contract we enter into with them or you;
- advertisers and ad networks that require the data to select and present you with relevant advertisements;
- analytics and search engine providers that assist us with the enhancement and optimisation of our Service;
- background checking service providers for the purpose of verifying your identity, where this is a condition of us entering a contract with you;
- fraud agencies for the detection and prevention of fraud and money laundering;
- information may be disclosed and otherwise transferred to any potential acquirer, successor, or assignee as part of any proposed merger, acquisition, debt financing, sale of assets, or similar transaction, or in the event of insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets, and

- if we are under a duty to disclose or share your personal data in order to comply with any tax, legal, reporting and auditing obligation, or in order to enforce or apply this Privacy Policy and any other agreements; or to protect the rights, property, or safety of Swise , our customers, or others;

We may, from time to time, provide access to other third party services (such as our social media pages on Twitter, Instagram, and/or LinkedIn), for example by clicking on links from within the Service. Please be aware that if you click on a link to one of these third-party services, they may be able to collect or share your personal information. We have no control over these third-party services and cannot be held responsible for their privacy practices. You should carefully review any policies and other statements prior to submitting any personal information.

5. Legal Basis for Processing your Information

Our legal basis for collecting and using the above personal information will depend on the type of personal information and the situation in which we collect it. However, in order to process your information, we primarily rely on the following grounds:

Required for entering into or carrying out a contract. We will need to process your information in order to meet our obligations under any contract we've made with you.

Required for compliance with a legal requirement. We are subject to a number of legal requirements that may require us to process your information. Furthermore, we may be required by law to disclose your information to a regulatory body or law enforcement agency.

Necessary for the purposes of legitimate interests. Either we or a third party will need to process your information for our (or a third party's) legitimate interests, provided that we have determined that your rights and freedoms (including your right to have your information protected) are not overridden by those interests. Among our legitimate interests are responding to requests and inquiries from you or a third party, optimizing our website and user experience, informing you about our Services, and ensuring that our operations are conducted appropriately and efficiently.

Consent. In some circumstances, we may ask for your consent to process your information in a particular way.

6. Security

At Swise, we prioritize the protection of your information. To prevent unauthorized access, use, or disclosure of your personal data, we have implemented a variety of security technologies and measures. These include administrative, physical, and technical safeguards to ensure the confidentiality, security, and integrity of your personal data. Our personnel are trained to follow these safeguards, and are only allowed to access, use, modify, or disclose personal data in accordance with the law or with your explicit consent.

Security incidents

If we become aware of a security breach that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access to your personal data (a "Security Incident"), we shall notify you without undue delay and provide written details of the Security Incident reasonably necessary to fulfill Security Incident reporting obligations under applicable data protection law(s).

Whenever possible, such information shall include the nature of the Security Incident, the categories and approximate number of data subjects and personal data records affected, the potential consequences of the Security Incident, and the steps we have taken or intend to take to address the incident and mitigate potential adverse effects.

7. How Long We Hold Your Information

Swise will only retain your information for as long as needed to fulfill the purposes we collected it for, such as providing our Service, conducting internal research, and complying with any legal, accounting, or reporting requirements. The criteria used to determine retention periods will be based on the nature of the data and the purposes for which it is kept, as well as the data's sensitivity and the potential for damage from unauthorized use or disclosure.

8. Your Rights

You have certain rights with respect to the personal information we hold about you. Below is a description of these rights and instructions on how to exercise them. Please be advised that we will require proof of your identity before we can respond to your request.

Right of Access. You have the right to request a copy of the personal information we maintain about you at any time and to verify that we are lawfully processing it. We can deny your request for a copy of your personal information or certain elements of the request, if we have a valid reason and if the regulatory body allows it. If we refuse your request or any element of it, we will provide you with our reasons for doing so.

Right of Correction or Completion. If the personal data we maintain about you is inaccurate or out-of-date and requires updating or correction, you have the right to have the information rectified or completed.

Right of Erasure. You have the right to request the deletion of your personal information under certain conditions, such as when the information is no longer required for the purposes for which it was collected or processed or when our processing of the information is based on your consent and there are no other legal grounds on which we may process the information.

Right to Object to or Restrict Processing. You have the right to object to our processing of your personal information under certain conditions. For instance, if we are processing your information based on our legitimate interests and there are no compelling legitimate grounds for us to do so that override your rights and interests. You may also have the right to restrict our use of your personal information, such as in circumstances where you have challenged the accuracy of the information and during the period where we are verifying its accuracy.

Right of Data Portability. You have the right to receive any personal information we hold about you in a structured, commonly used, and machine-readable format in certain instances. In such cases, you may request that we transmit the data to you or directly to a third-party organization. While we welcome such requests, we cannot guarantee technical compatibility with the systems of a third party organization. We are also unable to comply with requests that relate to personal information of others without their consent.

You can exercise any of these rights at any time by contacting us at privacy@swise.com

9. Changes To This Privacy Policy

Please review this Privacy Policy frequently, as it may be updated periodically. Any modifications to this Privacy Policy will be published on our websites. If we make material changes to how we use or share personal information previously collected from you through our Services, we will notify you via our Services, email, or other means.

10. Further information and contact

Swise is responsible for processing your personal data as described in this Privacy Policy. If you have any questions about the processing of your personal data, you can contact Swise at the following address:

Swise AG
Technoparkstrasse 1
8005 Zurich
Switzerland
Email: privacy@swise.com