

Processing of Personal Data

To comply with applicable legal provisions, in particular as a part of the Client segmentation process and its compliance with Anti-Money Laundering and Terrorism Financing Laws, Sumus Capital SA (hereinafter referred to as “**Sumus Capital**” or the “**Company**”) collects and processes information from and about its Clients and prospective Clients regarding their personal and financial circumstances. The Company not only processes personal data obtained from its Clients, but also processes personal data collected through publicly available sources and private sector data providers focusing on data relevant to the field of financial services. In this context, the Company may also process particularly sensitive personal data of its Clients, individuals representing them, Controlling persons, Beneficial owners of assets, as well as personal data of family members and other individuals with personal and commercial connections to our Clients.

If a Client refuses to provide the requested information to Sumus Capital, the Company may not be able to offer specific services, may not be allowed to establish a business relationship, or may need to terminate the existing relationship.

The Company is not allowed to delete the collected information upon or shortly after the termination of a business relationship but must retain this data as required by applicable legislation.

The Company may and will share personal data with third parties in the framework of the outsourcing of business activities to the extent required, as well as with other financial services providers, which also render services to the Client in question. Such outsourcing and business partners may be located in other countries where the Company deems the level of data protection to be adequate.

The Company, its Directors, and employees, as well as all of its outsourcing partners and agents, are subject to professional secrecy obligations pursuant to the Financial Institutions Act.

The Company maintains appropriate internal guidelines and compliance programs for the processing of personal data.