

Privacy Notice

of LGT Capital Partners

to investors in discretionary mandates

General Information

LGT Capital Partners cares about the protection of your personal data. This Privacy Notice (“**Notice**”) explains how and for what purposes LGT Capital Partners uses your personal data. Certain contents of the Notice, including data subject rights, may apply only where our processing of your personal data falls within the scope of specific data protection laws (in particular GDPR).

For the purposes of the Notice, “**Data**” shall mean personal data, i.e. any information relating to an identified or identifiable natural person. The terms “**you**” and “**your**” shall refer to you as a natural person, e.g. as a beneficial owner or controlling person of a discretionary mandate or, as the case may be, as a director, representative, signatory or other affiliate of a legal entity, partnership or trust acting as investor in such investment. “**LGT Capital Partners**”, “**we**”, “**us**” or “**our**” shall mean any subsidiary of LGT Group Holding Ltd. that is active in the business of asset management (hereinafter collectively referred to as “**LGT CP Companies**”, individually “**LGT CP Company**”). LGT Group Holding Ltd. is a stock company incorporated under the laws of the Principality of Liechtenstein with registered address at Herrengasse 12, 9400 Vaduz, Liechtenstein.

Important note

In the course of our dealings with you, we may process Data of persons related to you or to the company or other organization you may represent. Such persons may include, but are not limited to, directors, representatives, beneficial owners and controlling persons, employees, shareholders or other participants, business associates, service providers such as consultants, financiers, legal advisors or any other affiliates of you and/or the company or other organization you may represent (“**Affiliates**”). As we cannot possibly bring the Notice to the attention of all Affiliates, we kindly ask you to do so on our behalf.

Getting in touch

With regard to our use of your Data, you may contact our Data Protection Officer at:

LGT Group Holding Ltd.
Data Protection Officer
Herrengasse 12
9490 Vaduz, Liechtenstein
Telephone: +423 235 11 22
E-Mail: lgt.datenschutz@lgt.com

If you are unsure as to which LGT CP Company controls your Data, please do not hesitate to contact us. If such LGT CP Company has its registered office outside of the European Economic Area (“EEA”), the company acting as representative in the EEA is LGT Group Holding Ltd.

The Data we collect and process

In connection with your dealings with LGT Capital Partners, we may collect and process your Data. Depending on the circumstances, such Data may include your name, residential and e-mail addresses, telephone numbers, place and date of birth, gender, nationalities, certain tax and financial information, signature specimen, passport copies, any other information we may take note of in the course of our relationship and any correspondence with you in connection with the aforementioned items.

Purposes and legal basis for our use of your Data

We may process your Data for the purpose of performing our contract with you, in particular for communications with you regarding your investments. In order to organize the Data we hold in an efficient manner, we will store and process your data in our internal customer relationship software or, where necessary, in other databases. We may also process your Data for the purpose of complying with legal and regulatory obligations we are subject to, in particular in connection with Know-Your-Customer and Anti-Money Laundering rules. In this context, we may also conduct screenings of watchlists and assess whether you are a politically exposed person. Such processing activities will occur during the onboarding of you as a client, i.e. prior to the conclusion of our contract, and can take place at any time during your investment. Since our success depends on our ability to provide the best possible service and solutions to our clients, we need to have a thorough understanding of the investment strategy, specific needs and background of our clients. We may therefore process your Data to achieve this aim. This not only serves our legitimate interest in successfully running our business but also helps you in reaching your investment objectives. Where we are required under applicable data protection laws to obtain your explicit consent for processing certain Data, we will contact you. Unless you explicitly object, we will continue to store your Data after direct business relationship between your organization and LGT Capital Partners has ended. We do this in the mutual interest of maintaining contact with you in view of possible future investments and other collaboration.

In the course of your dealings with us, we may transfer your Data to categories of recipients such as regulatory and tax authorities, banks and other business partners that are typically involved in discretionary mandates. If required in a specific context, we may also transfer your Data to categories of recipients such as attorneys, auditors, prime brokers, consultants, providers of various services such as document storage, recordkeeping and background checks. We may further share your Data with any other subsidiary of LGT Group Holding Ltd., in particular with other LGT CP Companies. LGT Capital Partners has operations throughout the world. Therefore, such recipients may be located outside of the EEA (in particular Switzerland, United States of America, Hong Kong, Japan, Australia, People’s Republic of China and United Arab Emirates). In such cases, we will ensure that adequate safeguards with regard to data protection such as model contract clauses approved by the European Commission are in place.

Your rights

Please note that you are under no general obligation to provide your Data to us, except where applicable law requires you to do so. However, processing your Data will be necessary for the performance of the existing or possible future business relationship between your organization and us. You have the following rights regarding our use of your Data:

- the right to access your Data and to be informed of, inter alia, the purpose of our use of your Data, the categories of Data concerned and the recipients to whom we disclose your Data;
- the right to obtain from us without undue delay the rectification of inaccurate Data concerning you;

- under certain circumstances, the right to have your Data deleted;
- under certain circumstances, in particular if you contest the accuracy of the Data we use, the right to obtain from us restriction of our processing of your Data;
- where we rely on our legitimate interests to use your Data and provided that you can claim overriding interests, the right to object at any time to our use of your Data;
- where your consent for our use of your Data is required pursuant to applicable data protection laws, the right to withdraw your consent at any time;
- the right to data portability where processing is carried out by automated means and based on either the performance of a contract or, where applicable, your consent;
- where GDPR is applicable, you have the right to file a complaint with our lead supervisory authority in Liechtenstein:

Datenschutzstelle Liechtenstein
Städtle 38
PO Box
9490 Vaduz
Liechtenstein
Telephone: +423 236 60 90
E-Mail: info.dss@llv.li

You may also lodge a complaint with your local supervisory authority.

For how long we store your Data

LGT Capital Partners strives to build long-term relationships with its clients. We will store your Data during our business relationship with your organization. However, we may retain your Data even after such relationship has ended if we can reasonably expect your organization to continue doing business with LGT Capital Partners in the future. Should you leave your organization at an earlier stage, we shall delete your Data as soon as we learn of your departure. Longer retention periods may be applicable if required by applicable laws and regulations. Furthermore, possible legitimate interests of LGT Capital Partners may allow us to use your Data for a period exceeding the abovementioned term, particularly where our continued use of your Data is necessary for the establishment, exercise or defense of legal claims. In any case, you may at all times object to our processing of your Data and we shall review such request without undue delay (see above “Getting in touch”).