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## Privacy Notice for Clients and other Data Subjects<sup>1</sup>

as of April 1, 2026

### 1. Facts: Why? What and How?

To run our business, Bellecapital International AG (“Bellecapital”, “we” or “us”) processes personal data (hereinafter also “Data”), including information about prospective, current and former clients (“you”). We explain herein amongst others what type of Data we process, how it is used and shared as well as why we process such Data. Specific information on the limitation of data sharing is set out in the [Annex](#), which is in line with this Privacy Notice but less detailed and contains certain information structured as required under US laws. Note that the specific data processing and sharing depends on what services have been requested or agreed. Therefore, not all of this information may apply to you. Additionally, we inform you in this Privacy Notice about your data protection rights.

If you provide us with personal data of other persons (such as beneficial owners, family members, etc.), please make sure the respective individuals are aware of this Privacy Notice and the General Terms and Conditions and only provide us with their Data if they agree with our data processing and entitle you to disclose such Data. Moreover, please ensure that the Data is correct.

Additionally, you are required to update us of any change of Personal Data.

### 2. Who is responsible for Data processing and provides this Notice and how can I contact them?

The following organization is the controller of your personal data and, thus, responsible:

Bellecapital International AG  
Limmatquai 1  
CH-8001 Zurich  
Switzerland  
Email: [info@bellecapital-intl.com](mailto:info@bellecapital-intl.com)  
Telephone: +41 44 268 11 70

You can contact us directly at any time with your data protection concerns and questions in connection with this Privacy Notice incl. the execution of your data protection rights at the above-mentioned contact details.

### 3. What sources and type of Data do we use?

**Sources:** We process Data that we receive from our client or other data subjects in physical (e.g. letter) or electronic form (e.g. by email, over our website or App) and over the phone as well as in personal meetings as part of existing and future business relationships (e.g. you provide account information, enter into a contract, seek advice about your investments, direct us to buy securities or direct us to sell securities). In addition, we process – to the extent necessary for offering our services – Data that we obtain from publicly available sources (e.g. debtor lists, land registers, trade and association registers, the press, the Internet) or that <https://www.bellecapital.com> we receive from other companies of the Bellecapital Group (all companies are set out on our website and referred to together as “Group Companies”), as well as from other third parties such as credit

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<sup>1</sup> E.g. authorized representatives and agents, the beneficial owners, controlling persons, beneficiaries, representatives of legal entities, family members, interested parties

in products, third-party guarantors and other persons who are affected by data processing in accordance with this Privacy Notice.

bureaus or supervisory authorities, tax authorities, other companies such as financial intermediaries and third parties involved in a transaction like asset managers, investment advisors, financing companies, third-party banks and other business partners such as suppliers or service providers including financial and payment service providers.

**Relevant Data** are in particular: personal details (name, gender, marital status, address and other contact details, date and place of birth, nationality, social security number, tax domicile, information related to professional profile and employment details as well as history), further details of the account holder, beneficial owner and other representative relationships and authorized signatories, legitimization data and authentication data (e.g. specimen signatures, ID data, other client identification documents, electronic log-in data). In addition, this may also include order data (e.g. information on account movements, wire transfer instructions, payment orders, card transactions, investments, securities, custody accounts, financing), data from the fulfillment of our contractual obligations (e.g. turnover data in payment transactions, account data and account balances and assets, information on investments, transaction history and payment history, securities, or information on custody account), information about your professional, family or financial situation (e.g. financial targets, turnover, annual financial statement data, investment knowledge, creditworthiness data, risk/investment profile, scoring or rating data, information on current assets and the origin of assets), credit-relevant data (e.g. income and expenses, credit scoring, credit analysis and monitoring, monitoring of trading and credit limits), advertising and sales data (including advertising scores, individual client needs and client profiles), documentation data (e.g. counseling protocols), physical and electronic

correspondence (e.g. by email) and (client-) documents exchanged in this context (e.g. orders, receipts, account and custody statements, credit and debit notes, product or client-specific documentation such as signature and power of attorney forms, information on beneficial owners and/or management bodies, invoices, etc.), recordings of electronic correspondence as well as other data comparable to the categories mentioned.

## 4. Why do we process your Data (purpose of processing) and what legal basis do we rely on?

### 4.1 Purposes of processing

We always process your Data for a specific purpose and only process the Data which is relevant to achieve that purpose. In particular we process Data, within applicable legal limitations, for the following purposes:

#### a. Client onboarding

- to verify your identity and assess your application;
- to perform legal and regulatory compliance checks (for example, to comply with anti-money laundering regulations, and prevent fraud), please see Section e. below.

#### b. Client relationship management

- to manage our relationship with you, including communicating with you in relation to the products and services you obtain from us and from our business partners, handling customer service-related queries and complaints, facilitating debt recovery activities, making decisions regarding credit or your identity, tracing your whereabouts, and closing your account (in accordance with applicable law) if it

remains dormant and we are unable to contact you after a period of time;

- to help us to learn more about you as a client, your preferences regarding the products and services you receive, and other products and services, including those offered by us you may be interested in receiving.

#### c. Product implementation and execution

- to provide products and services to you and ensure their proper execution, for instance by ensuring that we can identify you and make payments to and from your accounts in accordance with your instructions and the product terms;
- to provide IT solutions to you and ensure their proper execution in accordance with your instructions and our contractual arrangements with you.

#### d. Marketing

- to contact you for marketing purposes about products and services we think will be of interest to you. **You may tell us if you do not wish to receive marketing material by contacting us at the contact information provided in Section 2 - if you are a client, please contact your advisor.**

#### e. Compliance and risk management and / or crime prevention, detection and investigation under Swiss and foreign (in particular US) laws

- to carry out legal and regulatory compliance checks in particular as part of the onboarding process and periodic compliance checks, including complying with anti-money laundering regulations, fraud prevention and financial crime prevention sanctions country screening;

- to meet our on-going as well as ad hoc regulatory and compliance obligations (e.g., laws of the financial sector, anti-money laundering and tax laws), including in relation to recording and monitoring communications, apply a risk classification to ongoing business relationships, disclosures to tax authorities, financial service regulators and other regulatory, judicial and governmental bodies or in proceedings and investigating or preventing crime as well as for the observance of reporting obligations and the answering of ad hoc requests and ad hoc reporting obligations such as also in case of data incidents/cyber-attacks;
- to receive and handle complaints, requests or reports from you or third parties made to designated units within Bellecapital;
- to reply to any actual or potential proceedings, requests or the inquiries of a public or judicial authority.

#### f. Supporting, enhancing and maintaining Bellecapital's technology

- to take steps to improve our products and services and our use of technology, including testing and upgrading of systems and processes, and conducting market research to understand how to improve our existing products and services or learn about other products and services we can provide.

#### g. Other purposes

- for the Group Companies' prudent operational management (including consolidated supervision purposes, credit, compliance and risk management, technological support services, reporting, insurance, audit, systems and

- products training and administrative purposes);
  - in case of any legal threat or action involving Bellecapital and/or the business relationship;
  - to secure, collect and/or enforce Bellecapital's or any other Group Companies' claims or collateral granted by the client, beneficial owner or any third parties,
  - to hedge and ensure any risk related to the client or beneficial owner(s) (such as credit or interests' risks);
  - in the case of allegations made by the client, its representatives, beneficial owner(s) or other person(s) related to the business relationship against Bellecapital or other Group Companies in public or to any authorities in Switzerland or abroad;
  - to re-establish contact in the event of a loss of contact as well as a lack of communications;
  - to enable a transfer, merger or disposal to a potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer, merger or disposal of part or all of Bellecapital's business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it;
  - to exercise our duties and/or rights vis-à-vis you or third parties.
- necessary to enter into or executing a contract with you for the services or products you request, or for carrying out our obligations under such a contract, such as when we use your Data for some of the purposes in Section 4.1 a. to (including) c. above, as well as certain of the Data disclosures described in Section 5. below;
  - required to meet our legal or regulatory responsibilities, including when we conduct the legal and regulatory compliance checks, such as when we use your Data for some of the purposes in Section 4.1 e. and g. above, and make the disclosures to authorities, regulators and government bodies referred to in Section 5. below;
  - necessary for the legitimate interests of Bellecapital, without unduly affecting your interests or fundamental rights and freedoms and to the extent such Data is necessary for the intended purpose (such as when we use your Data for some of the purposes in Section 4.1 a. to (including) g. See below for more examples of legitimate interests of Bellecapital);
  - in some cases, we have obtained your consent (for instance where required by law) or processed, where required under applicable laws or regulations, with your explicit consent in the case of special categories of Data (such as your biometric data); or
  - in some cases, necessary for the performance of a task carried out in the public interest.

## 4.2 Legal basis for processing of Data

Bellecapital processes your Data within the applicable legal framework. Where required and depending on the purpose of the processing activity (see Section 4.1), the processing of your Data will be one of the following grounds:

A legitimate interest of Bellecapital is for example considered in the following instances. The processing is necessary to:

- evaluate whether and how Bellecapital may offer products, services and events that may be of interest to you (see Section 4.1 d. above);
- prevent fraud or criminal activity, misuses of our products or services as well as the security of our information, IT systems, architecture and networks (see Section 4.1 e. above);
- receive and handle complaints, requests or reports from you or third parties made to Bellecapital (see Section 4.1 e. above);
- meet our on-going as well as ad hoc regulatory and compliance obligations (see Section 4.1 e. above);
- cooperate with a request made in any actual or potential proceedings or the inquiries of a public or judicial authority (see Section 4.1 e. above);
- exercise our rights under Articles 26 and 27 of the Federal Constitution of the Swiss Confederation, including our freedom to conduct a business and right to property;
- take steps to improve our products and services and our use of technology and to conduct market research (see Section 4.1 f. above);
- meet our accountability for prudent operational management (see Section 4.1 g. above) and regulatory requirements around the world;
- enable a transfer, merger or disposal to a potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transaction (see Section 4.1 f. above);
- defend any legal threat or action involving Bellecapital and/or the business relationship (see Section 4.1 g. above);
- secure, collect and/or enforce Bellecapital's or any other Group Companies' claims or collateral granted by the client, beneficial owner or any third parties (see Section 4.1 g. above);
- hedge and insure any risk related to the client or beneficial owner(s) (such as credit or interests' risks, see Section 4.1 g. above);
- defend allegations (see Section 4.1 g. above);
- to re-establish contact (see Section 4.1 g. above);
- certain situations when we make the disclosures referred to in Section 5. below.

Where the Data we collect from you is needed to meet our legal or regulatory obligations or enter into an agreement with you, if we cannot collect this Data there is a possibility, we may be unable to onboard you as a client or provide products or services to you (in which case we will inform you accordingly).

## 5. Who will receive my Data?

Within Bellecapital, those departments that need your Data to fulfill our contractual and legal obligations will have access to it.

In addition, we exchange your Data as follows:

- a. Within the Group Companies:

With other Group Companies for the purposes listed in Section 4.1 to provide the services and products to you. Moreover, other Group Companies may process Data on behalf and upon request of us.

Outside Bellecapital and the Group Companies:

b. Third parties:

We transfer Data to other credit and financial services institutions and comparable institutions and to our professional advisers and consultants to perform the business relationship with you. In particular, when providing products and services to you, we will share Data with persons acting on your behalf or otherwise involved (depending on the type of product or service you receive from us) or authorized by you, including, where relevant the following types of companies:

- issuers of securities (including third parties appointed by them) in which you have an interest, where such securities are held by third party banks for you;
- payment recipients, beneficiaries, account nominees, intermediaries, correspondent and agent banks (including custodian banks);
- clearing houses, and clearing or settlement systems and specialized payment companies or institutions such as SWIFT;
- market counterparties, upstream withholding agents, swap or trade repositories, stock exchanges;
- any third-party adviser, asset manager or broker-dealer who provides services to you; and
- lawyers, auditors, or accountants, providing legal, audit, consultancy, or accounting services to us.

c. Service providers:

In some instances, we also share Data with our suppliers, who are contractually bound to confidentiality, such as IT hardware, software and outsourcing providers, logistics, mail,

courier, printing services and storage providers, marketing and communication providers, facility management companies, market data service providers, transportation and travel management providers and others. When we do so we take steps to ensure they meet our data security standards.

d. Public and regulatory authorities:

If required from time to time, we disclose Data to public authorities, regulators or governmental bodies, courts or parties to proceedings, where we are required to disclose information by applicable law or regulation, under a code of practice or conduct, at their request, or to safeguard our legitimate interests. Primarily relevant with regard to the disclosure is the FINMA and the SEC.

e. Others:

- We may need to disclose Data to exercise or protect legal rights, including ours and those of our employees or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others;
- A potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer or merger of part or all of Bellecapital's business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it;
- Any other legitimate recipient required by applicable laws or regulations.

## 6. Is Data transferred to other countries?

The recipients set out in Section 5 above may be located in Switzerland but may also be

located abroad (mainly in the US, the EEA and in the UK). We only transfer your Data abroad to countries which are considered to provide an adequate level of data protection such as the EEA and the UK, or in the absence of such legislation (e.g. for the US) if this is in line with applicable data protection laws that means if appropriate safeguards are given (e.g., standard contractual clauses adopted by the European Commission or another statutory exemption).

Certain recipients are located in jurisdictions such as the US, which provide a level of data protection that is lower than the level of data protection in Switzerland and the EEA which may include extensive state data access rights, processing of personal data beyond the purposes for which it has been collected as well as no or little instruments of legal protection and no or little state control mechanisms in relation to data protection. Even though we will ensure that any transfer is in line with applicable data protection laws, there remains a higher risk for your Data if such Data is processed outside Switzerland. This even applies if a country provides adequate data protection such as the EEA.

Bellecapital and its group companies operate mainly in Switzerland, the EEA, the UK and the US.

## 7. What should be considered when communicating via email?

The client acknowledges that email communication with Bellecapital may occur over unencrypted or insecure channels, posing risks such as unauthorized access by third parties and potential exposure of the existence of the business relationship. Additionally, even if both parties are in Switzerland, data may be transmitted abroad, where legal protections—

especially regarding data privacy—may not match Swiss standards. **The client fully releases Bellecapital, its governing bodies, employees, and agents from all confidentiality obligations owed by the financial institution in this regard and waives banking secrecy according to Section 10.2 and 23 GTC.**

Email communication carries risks, such as manipulation, malware, or delivery failures due to technical issues or third-party interference. The client is responsible for ensuring secure email use and assumes all related risks and damages, as outlined in Section 8 of the GTC.

## 8. How do we protect Data?

All Bellecapital employees accessing Data must comply with our internal rules and processes in relation to the processing of your Data to protect them and ensure their confidentiality. Bellecapital and the Bellecapital Group have also implemented adequate technical and organisational measures to protect your Data against unauthorised, accidental or unlawful destruction, loss, alteration, misuse, disclosure or access and against all other unlawful forms of processing.

## 9. How long will my Data be stored and potentially further processed such as shared?

We process and retain your Data as long as required for the performance of our contractual obligation and compliance with legal obligations or other purposes pursued with the processing, i.e. for the duration of the entire business relationship (from the initiation, during the performance of the contract until it is terminated) as well as beyond this duration in accordance with legal retention and documentation obligations. Personal data may be retained for the period during which claims can be asserted against us or a Group Company or insofar as we are otherwise legally obliged to do so

or if legitimate business interests require further retention (e.g., for evidence and documentation purposes). Overall, we generally store Data for the period of the relationship plus 10 years. As soon as your Data are no longer required for the above-mentioned purposes, they will be deleted or anonymized, to the extent possible.

## 10. What data protection rights do I have?

Every data subject has the right to access, the right to rectification, the right to erasure, the right to restriction of processing, the right to object and the right to data portability. Under certain circumstances, these rights may be limited or not granted in full, of which we will inform you separately. In addition, you have the right to contact the competent data protection supervisory authority, in Switzerland the Federal Data Protection and Information Commissioner (FDPIC), if you believe that we do not process your Data in accordance with data protection legislation. Regarding the right to limit data sharing, see the specific attachment considering US law requirements ([Annex](#)).

You can withdraw your consent to the processing of personal data at any time. Please note that the withdrawal will only take effect for the future. Processing that took place before the withdrawal is not affected thereby.

To exercise your rights, contact us at the contact information set out in Section 2.

## 11. Am I obliged to provide Data?

As part of our business relationship, you must provide the personal data that is necessary for the commencement, performance, and termination of a business relationship and for the fulfillment of all associated contractual obligations or for which we are legally obliged to collect. Without this Data, we will generally not be

able to enter into or perform a contract with you and are required to terminate it.

In particular, we are obliged under anti-money laundering regulations to identify you on the basis of your identification document before establishing the business relationship and to collect and record your name, place of birth, date of birth, nationality, address and identification data. In order for us to comply with this legal obligation, you must provide us with the necessary information and documents in accordance with the Anti-Money Laundering Act and notify us immediately of any changes that arise during the course of the business relationship. If you do not provide us with the necessary information and documents, we may not enter into or continue the business relationship you requested.

## 12. To what extent is there automated decision-making?

We generally do not use fully automated decision-making to establish and conduct business relationships. Should we use these procedures in individual cases, we will inform you separately about this and your rights in this regard, insofar as this is required by law.

## 13. Amendments of this Privacy Notice

We may amend this Privacy Notice at any time without prior notice. The current version published on our website shall apply. Please visit our website frequently to understand the current Notice, as the terms of this Notice closely relate to you.

## Annex I: Privacy Notice Structured under US Law Specifying Opt-Out Options<sup>2</sup>

as of April 1, 2026

FACTS	What does Bellecapital International AG do with your personal information?	
Why?	Financial companies choose how they share your personal information. US Federal law gives consumers the right to limit some but not all sharing. US Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do. This notice is to be read in line with the full Privacy Notice but emphasizes certain aspects relevant under US laws.	
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>▪ Social Security number and wire transfer instructions</li> <li>▪ Account balances and assets</li> <li>▪ Transaction history and payment history</li> </ul> <p>When you are <i>no longer</i> our client/customer, we continue to share your information as described in this Annex and as further detailed in the Privacy Notice.</p>	
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information (details are in the full Privacy Notice); the reasons Bellecapital International AG chooses to share; and whether you can limit this sharing.	
Reasons we can share your personal information	Does Bellecapital International AG share?	Can you limit this sharing?
For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes to offer our products and services to you	No	We do not share
For joint marketing with other financial companies	No	We do not share
For our affiliates' everyday business purposes information about your transactions and experiences	No	We do not share
For our affiliates' everyday business purposes information about your credit worthiness	No	We do not share
For our affiliates to market to you	No	We do not share
For non-affiliates to market to you	No	We do not share

<sup>2</sup> This document is an addition and contains certain specifications and certain data structured in the form as required under US law.

Who we are	
Who is providing this notice?	Bellecapital International AG
What we do	
How does Bellecapital International AG protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with US Federal law. These measures include computer safeguards and secured files and buildings.
How does Bellecapital International AG collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>▪ Provide account information</li> <li>▪ Enter into an investment advisory contract or seek advice about your investments</li> <li>▪ Direct us to buy securities or direct us to sell your securities</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>US Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>▪ Sharing for affiliates' everyday business purposes information about your creditworthiness</li> <li>▪ Affiliates from using your information to market to you</li> <li>▪ Sharing for non-affiliated to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Our affiliates are Bellecapital AG and Bellecapital UK Ltd</i></li> </ul>
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and non-financial companies.</p> <ul style="list-style-type: none"> <li>▪ <i>Bellecapital International AG does not share with non-affiliates so they can market to you</i></li> </ul>
Joint marketing	<p>A formal agreement between non-affiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>▪ <i>Bellecapital International AG does not jointly market</i></li> </ul>
To limit our sharing	<p>Call +41 44 268 11 70 or send us an email at <a href="mailto:info@bellecapital-intl.com">info@bellecapital-intl.com</a></p> <p>If you are a new customer, we can under US law begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this Annex as well as in the full Privacy Notice. However, you can contact us at any time to limit our sharing.</p>

Questions?

Call +41 44 268 11 70 or send us an email at  
[info@bellecapital-intl.com](mailto:info@bellecapital-intl.com)

Other important information

Generally speaking, we do not share any information with Third Parties (Swiss Banking Secrecy Rule). Exceptions are versus the SEC in an audit / review or to respond to legal matters approved by a Swiss Court and others as detailed in the General Terms and Conditions as well as in the full Privacy Notice (Section 5).

## Annex II: California Consumer Privacy Act Notice and Notice at Collection

as of April 1, 2026

This California Consumer Privacy Act Notice at Collection ("Notice") is provided by Bellecapital International AG ("Company", "we", "us" or "our"). This Notice explains how we collect, use, retain, and disclose personal information about California residents. The Notice also explains certain rights that California residents have under the California Consumer Privacy Act (the "CCPA").

The CCPA only applies to information about residents of California. If you are a resident of a U.S. state other than California, you may submit a request and we may process it, as described in this Notice, even though the CCPA does not require us to do so. We reserve the right to change or stop the practice of accepting requests from U.S. residents of states other than California, except as otherwise required by law.

Under the CCPA, "personal information" is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. This information is referred to in this Notice as "Personal Data."

### 1. Categories of Personal Data that We Collect

We collect Personal Data in a variety of contexts. For example, we collect Personal Data to provide financial products and services, for our human resources, and for vendor management purposes.

The Personal Data that we collect about a specific California resident will depend on, for example, our relationship or interaction with that individual. During the past 12 months, we have collected the following categories of Personal Data.

**Personal Identifiers** — Personal unique identifiers, such as full name and federal or state issued identification numbers, including Social Security number, driver's license number, and passport number

**Personal Information** — Personal information, including contact details (e.g., telephone number and address), financial information (e.g., account number and balance), payment card details (e.g., credit and debit card numbers), and medical and health insurance information

**Characteristics of Protected Classes** — Characteristics of protected classes or groups under state or federal law, such as sex, disability, citizenship, primary language, immigration status, and marital status

**Purchase Information** — Purchase information, such as products and services obtained and transaction histories

**Internet or Online Information** — Internet or online information (e.g., browsing history), including information about interaction with our websites, applications, or advertisements

**Employment Information** — Professional or employment-related information, such as work history, information from background checks, resumes, and personnel files, personal qualifications, training, and work preference, payroll and benefit information, leave and absence information, and performance and disciplinary information

**Education Information** — Education information subject to the federal Family Educational Rights and Privacy Act, such as student records and confirmation of graduation; and

**Inferences** — Inferences based on information about an individual to create a summary about, for example, an individual's preferences and characteristics; and

**Sensitive Personal Information** — Includes:

- Social Security number, driver's license, state identification card, or passport number;
- Account details, financial account information, debit card, or credit card number;
- Racial or ethnic origin, religious or philosophical beliefs, citizenship, immigration status, or union membership;
- The contents of mail, email, and text messages unless we are the intended recipient of the communication;
- Health Information
- Sexual Orientation

## 2. Sources of Personal Data

The sources from which we collect Personal Data depend on, among other things, our relationship or interaction with a specific California resident. The information below lists the categories of sources from which we collect Personal Data in different contexts.

- From California residents directly, or other individuals acting on their behalf, through, for example, physical (e.g., paper application), audible (e.g., phone), and electronic (e.g., website, social media) sources.
- Public records or widely available sources, including information from the media, and information that is made available by federal, state, and local government entities.
- Outside companies or organizations that provide data to support activities such as fraud prevention, underwriting, and marketing. Examples may include internet service providers, social networks, data brokers, advertising networks, and data analytics providers
- Outside companies or organizations from whom we collect Personal Data to support human resource and workforce management activities. Examples may include service providers and social networks.
- Outside companies or organizations from whom we collect Personal Data as part of providing products and services, completing transactions, supporting our everyday operations, or business management and development. Examples include companies or organizations to whom we provide products or services; other parties, partners, and financial institutions; and parties involved with mergers, acquisitions, and other transactions involving transfers of all or part of a business, or a set of assets.

## 3. Why We Collect Personal Data and How We Use It

We may use (and may have used during the 12-month period) your personal information for the purposes described in our Privacy Policies and for the following business purposes specified in the CCPA/CPRA:

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, or providing similar services
- Providing advertising and marketing services to you, except for cross-context behavioral advertising
- Helping to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for these purposes
- Debugging to identify and repair errors that impair existing intended functionality

- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.

We collect, use and disclose sensitive personal information, as permitted by law to:

- Perform services for our business, provide goods or services as requested by individuals
- Detect and investigate security incidents
- Process and fulfill orders, maintain and service accounts, provide customer service, verify customer information
- Conduct activities relating to quality and safety control or product improvement
- Support employment, infrastructure, and human resource management
- Counter wrongful or unlawful actions
- Collect and process, for purposes permitted by CCPA, without inferring characteristics about an individual

#### 4. Disclosure of Personal Information

With respect to each category of Personal Information that we disclosed for a business purpose in the past 12 months, the categories of persons or entities to whom we disclosed that Personal Information are:

- Affiliates of BCI;
- Service Providers and Contractors who provide services such as website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure, customer service, email delivery, auditing, marketing, supporting research activities, event management;
- Other Service Providers and Contractors who provide services such as payment, banking and communication infrastructure, storage, legal expertise, and tax expertise;
- Other persons or entities to whom we transfer Personal Information as an asset that is part of a merger, acquisition or other transaction in which such other person or entity assumes control of all or part of the business;
- Government Agencies as required by laws and regulations;
- Other persons or entities with which you may use or direct us to intentionally interact or to which you may use or direct us to intentionally disclose your Personal Information.

#### 5. Retention of Personal Information

The length of time that we intend to retain each category of Personal Information will depend on several criteria, including (i) the length of time we are required to retain Personal Information in order to comply with applicable legal and regulatory requirements, (ii) the length of time we may need to retain Personal Information in order to accomplish the business or commercial purpose(s) for which such Personal Information is collected, used or disclosed (as indicated in this Notice), and (iii) whether you choose to exercise your right, subject to certain exceptions, to request deletion of your Personal Information.

## 6. Requests Under the CCPA

The CCPA defines a “sale” as the disclosure of Personal Data for monetary or other valuable consideration. Bellecapital does not sell and has not, within the last 12 months, sold Personal Data, including Sensitive Personal Information. Furthermore, we have no actual knowledge that we sell or share (for purposes of cross-context behavioral advertising) Personal Data, including Sensitive Personal Information, of minors under 16 years of age.

If you are a California resident, you have the right to request that we:

1. Disclose to you the following information ("Request to Know"):
  - a. The categories of Personal Data we collected about you and the categories of sources from which we collected the Personal Data;
  - b. The business or commercial purpose for collecting or sharing Personal Data about you;
  - c. The categories of third parties to whom we disclosed Personal Data about you, and the categories of Personal Data disclosed;
  - d. The categories of Personal Data about you that we shared and the categories of third parties with whom we shared such Personal Data; and
  - e. The specific pieces of Personal Data we collected about you.
2. Delete Personal Data we collected from you ("Request to Delete").
3. Correct inaccurate personal information that we maintain about you ("Request to Correct").
4. Opt you out of "sharing", for purposes of cross-context behavioral advertising, ("Request to Opt-Out of Sharing").

In addition, you have the right to be free from discrimination by a business for exercising your CCPA privacy rights, including the right as an employee, applicant, or independent contractor not to be retaliated against for exercising your CCPA privacy rights.

## 7. How to Make Requests

If you are a California resident, you can make a Request to Know, Delete, or Correct by:

- Contacting us at Limmatquai 1, CH-8001 Zurich, Phone: + 41 44 268 11 70; or
- Submitting your request at [info@bellecapital-intl.com](mailto:info@bellecapital-intl.com).

We will ask you to provide the following information to identify yourself:

- Name, contact information and date of birth; and
- A copy of a government-issued photo ID.

When you make a Request to Know, Delete, or Correct, we will attempt to verify that you are who you say you are. For example, we will attempt to match information that you provide in making your Request with other sources of similar information to reasonably verify identity.

To make a Request to Opt-Out of Sharing, contact [info@bellecapital-intl.com](mailto:info@bellecapital-intl.com).

## 8. Responding to Requests

Privacy and data protection laws, other than the CCPA, apply to much of the Personal Data that we handle. When these other laws apply, Personal Data may be exempt from, or outside the

scope of, a request to Know, Delete, or Correct. For example, information subject to certain federal privacy laws, such as the Gramm-Leach-Bliley Act or the Health Insurance Portability and Accountability, is exempt from CCPA Requests. As a result, we may decline all or part of your Request to the extent that it relates to exempt Personal Data. This means that we may not provide, delete, correct, or opt-out some, or all, of this Personal Data when you make a CCPA Request.

As examples, our processing of, or response to, a CCPA Request may not include some or all of the following Personal Data:

- Consumer Accounts. Personal Data related to consumer accounts used for personal, family, or household purposes and applications for such accounts. We have other privacy notices providing certain information on use and sharing of this data, for example, the Bellecapital Privacy Notice, available at <https://www.bellecapital.com/en/privacy-policy>.
- The types of Personal Data described above are examples. We have not listed all types of Personal Data that may not be included when we respond to or process CCPA Requests.

In addition to the above examples, we may not include Personal Data when we respond to or process CCPA Requests when the CCPA recognizes another exception. For example, we will not provide the Personal Data about another individual when doing so would adversely affect the data privacy rights of that individual. As another example, we will not delete Personal Data when it is necessary to maintain that Personal Data to comply with a legal obligation.

We will verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the Personal Data subject to the request.

## 9. Authorized Agents

If you are a California resident, you may authorize an agent to make a request on your behalf. A California resident's authorized agent may make a request on behalf of the California resident by using the submission methods listed above under "How To Make Requests." As part of our verification process, we may request that you provide, as applicable:

- For an individual ("requestor") making a request on behalf of a California resident:
  - The requestor's name; contact information; Social Security or individual taxpayer identification number; date of birth; and driver's license, state ID, or matricula card.
  - The name; contact information; Social Security or individual taxpayer identification number; date of birth; and driver's license, state ID, or matricula card of the California resident on whose behalf the request is being made.
  - A document to confirm that the requestor is authorized to make the request. We may accept, as applicable, a signed permission by the California resident on whose behalf the request is made, a copy of a power of attorney, legal guardianship or conservatorship order, or a birth certificate of a minor if the requestor is the custodial parent.
- For a company or organization ("legal entity requestor") making a request on behalf of a California resident:

- Proof that the California resident has authorized the legal entity requestor to make the request. We may accept as applicable, a signed permission by the California resident on whose behalf the request is made, copy of power of attorney, or legal guardianship or conservatorship order.
- The name; contact information; Social Security or individual taxpayer identification number; date of birth; and driver's license, state ID, or matricula card of the California resident on whose behalf the request is being made. From the individual who is acting on behalf of the legal entity requestor, proof that the individual is authorized by the legal entity requestor to make the request. We accept a letter on the legal entity requestor's letterhead signed by an officer of the organization.

## 10. Deidentified Information

Where we maintain or use deidentified information, we will continue to maintain and use the deidentified information in a deidentified fashion and will not attempt to re-identify the information.

## 11. Changes to this Notice

We may change or update this Notice periodically. When we do, we will post the revised Notice on this webpage indicating when the Notice was "Last Updated."

## 12. Contact Us

If you have any questions or concerns about Bellecapital's privacy policies and practices, please contact us at [info@bellecapital-intl.com](mailto:info@bellecapital-intl.com). Please do not use this email address to send sensitive information or account-specific questions; instead call + 41 44 268 11 70 with any account-specific questions.

## Privacy Notice for Service Providers/Suppliers and Business Partners

as of April 1, 2026

With this Privacy Notice for Service Providers/Suppliers and Business Partners we, Bellecapital International AG, Limmatquai 1, 8001 Zurich (hereinafter Bellecapital, we or us), describe how we collect and further process personal data of suppliers, service providers and business partners including data of their consultants, employees or other individuals acting on their behalf. This Privacy Notice is not a comprehensive description of all our data processing. Other privacy notices or general terms and conditions or similar documents are applicable to specific circumstances.

The term "personal data" in this Privacy Notice shall mean any information that identifies or could reasonably be used to identify any person.

If you provide us with personal data of other persons (such as work colleagues), please make sure the respective persons are aware of this Privacy Notice and only provide us with their data if you are allowed to do so and such personal data is correct.

### 1. Controller / contact information

The "controller" of the data processing as described in this Privacy Notice (i.e. the responsible person) is the entity below:

Bellecapital International AG  
Limmatquai 1  
CH-8001 Zurich  
Switzerland

Email: [info@bellecapital-intl.com](mailto:info@bellecapital-intl.com)

Telephone: +41 44 268 11 70

You can notify us of any data protection related concerns using the above contact details. If you write a letter, please add to the address of Bellecapital International AG that the letter should be for the attention of Compliance.

### 2. Collection and processing of personal data

We process personal data of suppliers, service providers and business partners as well as of employees, consultants, and other representatives of our suppliers, service providers and business partners.

On the one hand, we process personal data that you provide to us directly (such as contact information), and—where permitted—we also obtain certain data from publicly accessible sources (e.g., debt collection registers, land registers, commercial registers, press, internet) or receive such data from authorities and other third parties (e.g., credit agencies). In addition to the data you provide directly, the categories of personal data we receive from third parties about you include, in particular, information from public registers, information we learn in connection with official and legal proceedings, information related to your professional roles and activities (so that we can, for example, conduct and manage business with your employer with your assistance), information about you in correspondence and meetings with third parties, creditworthiness information (to the extent we conduct business with you personally), information about you provided by individuals from your environment (advisors, legal

representatives, employers, etc.) so that we can conclude or process contracts with you or involving you (e.g., powers of attorney), information to comply with legal requirements, and information from banks, insurance companies, distribution and other contractual partners of ours regarding the use or provision of services by you (e.g., completed payments, purchases made).

### 3. For what purposes do we need your personal data?

We process personal data of suppliers, service providers and business partners as well as their consultants, employees or other individuals acting on their behalf in connection with the conclusion and execution of contracts entered into with such suppliers, service providers and business partners.

Furthermore, we require your personal data in particular to fulfill legal obligations, to protect our rights, and to prevent and investigate criminal offenses and other misconduct. We may also use your personal data in connection with the purchase and sale of business units or parts thereof and other corporate transactions, including the related transfer of personal data.

### 4. What categories of personal data do we process?

**Suppliers, service providers and business partners and their employees, consultants, and other representatives:** Contact information, and where relevant, information about creditworthiness or information from publicly accessible sources about the contracting party, if this is relevant for assessing whether entering into a contract is appropriate (see section 2).

### 5. Do we disclose your personal data? To whom and to which countries?

As part of our business activities and for the purposes outlined in section 3, we may disclose personal data to third parties where permitted and where we deem it appropriate—either because they process the data on our behalf or because they use it for their own purposes.

These third parties include, in particular:

- Our service providers, including data processors (e.g., IT providers);
- Group companies;
- Contractual partners and involved parties (e.g., banks);
- Dealers, suppliers, subcontractors, and other business partners;
- Domestic and foreign authorities, agencies, or courts;
- Other parties in potential or actual legal proceedings;

Collectively referred to as “**recipients.**”

Certain recipients may be within Switzerland but they may be located in any country worldwide. In particular, you must anticipate your data to be transmitted to the US and the UK.

If a recipient is located in a country without adequate statutory data protection, we require the recipient to undertake to comply with data protection (for this purpose, we use the revised European Commission’s standard contractual clauses, which can be accessed here: [https://eur-lex.europa.eu/eli/dec\\_impl/2021/914/oj?](https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?)), unless the recipient is subject to a legally accepted set of rules to ensure data protection and unless we cannot rely on an exception. An exception may apply, for example in case of legal proceedings abroad, but also in cases of overriding public interest or if the performance of a contract requires disclosure, if you have consented or if data has been made available generally by you and you have not objected to the processing.

## 6. Your rights

In accordance with and as far as provided by applicable law, you have the right to access, rectification and erasure of your personal data, the right to restriction of processing or to object to our data processing, in particular for direct marketing purposes in addition to the right to receive certain personal data for transfer to another controller (data portability). Please note, however, that we reserve the right to enforce statutory restrictions on our part, for example if we are obliged to retain or process certain data, have an overriding interest (insofar as we may invoke such interests) or need the data for asserting claims. If you have given us your consent to process your personal data for certain purposes, we will process your personal data within the scope of and based on this consent, unless we have another legal basis, provided that we require one. Consent given can be withdrawn at any time, but this does not affect data processed prior to withdrawal.

In addition, every data subject has the right to enforce his/her rights in court or to lodge a complaint with the competent data protection authority. The competent data protection authority of Switzerland is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

## 7. Amendments to this Privacy Policy

We may amend this Privacy Policy at any time without prior notice. The current version published on our website shall apply.

## Privacy Notice for Job Applicants

as of April 1, 2026

With this Privacy Notice for Job Applicants (Privacy Notice) we, Bellecapital International AG, Limmatquai 1, 8001 Zurich (hereinafter Bellecapital, we or us), describe how we collect and further process personal data of job applicants. This Privacy Notice is not a comprehensive description of all our data processing. Other data protection statements or general terms and conditions or similar documents are applicable to specific circumstances. Kindly note that the processing of personal data of prospects/individuals interested in our services are governed in the Privacy Notice for Clients and Other Data Subjects.

The term "personal data" in this Privacy Notice shall mean any information that identifies or could reasonably be used to identify any person.

If you provide us with personal data of other persons (such as work colleagues, referees), please make sure the respective persons are aware of this Privacy Notice and only provide us with their data if you are allowed to do so and such personal data is correct.

### 1. Controller / contact information

The "controller" of the data processing as described in this Privacy Notice (i.e. the responsible person) is the entity below:

Bellecapital International AG  
Limmatquai 1  
CH-8001 Zurich  
Switzerland

Email: [info@bellecapital-intl.com](mailto:info@bellecapital-intl.com)

Telephone: +41 44 268 11 70

You can notify us of any data protection related concerns using the above contact details. If you write a letter, please add to the address of Bellecapital International AG that the letter should be for the attention of Compliance.

### 2. What data is collected?

We collect personal data which is voluntarily made available to us by you. This will specifically happen if you contact Bellecapital by phone or email or submit your application. Insofar as it is permitted to us, we may obtain certain personal data from publicly accessible sources (e.g., debt registers, commercial registers, press, internet) or we may receive such information from authorities or other third parties (such as e.g., your former employer).

### 3. What is the collected data used for?

We collect, store and process your data and documents transmitted directly to us or via third parties (such as headhunters) for the purpose of reviewing your application and the entire application process. If you are not hired, we will retain your data only as long as necessary to protect our legitimate interests and in accordance with applicable data protection laws. For any future job offers, we will keep your documents for a further 12 months since the rejection. We may also retain your contact data (name, email address) beyond this period. You can object to this retention at any time by using the contact information provided in Section 1.

#### 4. How do we protect your data?

Bellecapital and all its commissioners take the necessary technical and organizational measures to ensure the safekeeping of the collected personal data and to protect it from loss and unauthorized access. However, complete data security cannot be guaranteed. This is due to the fact that data transmission via internet is dependent on external factors that Bellecapital has no control over.

#### 5. How long do we store personal data?

We process and retain your personal data as long as required for the purposes pursued with the processing. As soon as your personal data are no longer required for the above-mentioned purposes, they will be deleted or anonymized, to the extent possible. In general, shorter retention periods of no more than twelve months apply for operational data (e.g., system logs).

#### 6. With whom do we share your personal data and where are the recipients located?

In the context of our business activities and in line with the purposes of the data processing set out in Section 3, we may transfer data to third parties, insofar as such a transfer is permitted and we deem it appropriate, in order for them to process data for us or, as the case may be, their own purposes. In particular, the following categories of recipients may be concerned:

- our service providers including processors (such as e.g. IT providers)
- business partners
- domestic and foreign authorities or courts
- your representatives or parties authorized by you (if applicable)
- other parties in possible or pending legal proceedings
- group companies of Bellecapital (e.g. Bellecapital AG and Bellecapital UK Ltd.)

together Recipients.

Certain Recipients may be within Switzerland, but they may be located in any country worldwide. In particular, you must anticipate your data to be transmitted to the US, EEA and the UK.

If a recipient is located in a country without adequate statutory data protection, we require the recipient to undertake to comply with data protection (for this purpose, we use the revised European Commission's standard contractual clauses, which can be accessed here: [https://eur-lex.europa.eu/eli/dec\\_impl/2021/914/oj?](https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?) including the Swiss local law amendments), unless the recipient is subject to a legally accepted set of rules to ensure data protection and unless we cannot rely on an exception. An exception may apply, for example in case of legal proceedings abroad, but also in cases of overriding public interest or if the performance of a contract requires disclosure, if you have consented or if data has been made available generally by you and you have not objected to the processing.

#### 7. What rights do you have regarding your personal data?

In accordance with and as far as provided by applicable law, you have the right to access, rectification and erasure of your personal data, the right to restriction of processing or to object to our data processing, in particular for direct marketing purposes in addition to the right to receive certain personal data for transfer to another controller (data portability). Please note, however, that we reserve the right to enforce statutory restrictions on our part, for example if we are obliged to retain or process certain data, have an overriding interest (insofar as we may invoke such interests) or need the data for asserting claims. If you have given us your consent to process your personal data for certain purposes, we will process your personal data within the scope of and based on this consent, unless we have another legal basis, provided that we

require one. Consent given can be withdrawn at any time, but this does not affect data processed prior to withdrawal.

In addition, every data subject has the right to enforce his/her rights in court or to lodge a complaint with the competent data protection authority. The competent data protection authority of Switzerland is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

## **8. Amendments to this Privacy Notice**

We may amend this Privacy Notice at any time without prior notice. The current version published on our Website shall apply.