

PRIVACY POLICY

INFORMATION ON DATA PROTECTION

VERSION 1 SEPTEMBER 2023

CONTENTS

Offer of products and services of Generali Investments	2
Scope	2
Person responsible for data processing (controller)	2
Data categories and legal basis for data processing	2
Scope and purpose of data processing	3
Data procurement	5
Data sharing and transfer	5
Duration of data retention	6
Communication with Generali Investments	7
Data subject rights	7
Legal basis for the processing of your data	8
Update	9

PRIVACY POLICY – INFORMATION ON DATA PROTECTION

Generali Investments Switzerland is aware of the high value that your personal data enjoys. Therefore, we inform you transparently with the following privacy policy about the acquisition, processing, and management of your personal data by Generali Investments Switzerland and the rights to which you are entitled.

This description is not exhaustive; if necessary, other data protection declarations or general terms and conditions of brokerage and similar documents regulate further specific, data protection-relevant matters. Personal data or person-related data (hereinafter also referred to as “data”) is understood in the following to be all information that relates to an identified or identifiable natural person (e.g., name, date of birth, e-mail address, IP address). Information that is anonymised or aggregated and can no longer be used to identify a specific person is not considered data. Data processing includes any handling of personal data, e.g., obtaining, storing, using, disclosing, changing, archiving, or deleting data. The legal basis and purpose for processing your data is primarily the initiation and/or fulfillment of your contract for the purchase or sale of investment funds. In addition, we base the processing of the data on the existence of a legal basis/ legal obligation and/or (implicit or explicit) consent (by you or a person authorised by you) as well as on the overriding legitimate interest of Generali Investments (i.e., in particular in order to pursue the purposes described and related objectives and to be able to implement appropriate measures).

If you wish to enter a contract with us, you must truthfully provide us with all data required for the establishment and performance of the business relationship and for the fulfillment of the associated contractual obligations. Without this data, we are not able to conclude a contract with you or to fulfill it. Only provide us with correct data and ensure that you are authorised to disclose the data to us.

If you provide us with personal data of other persons (e.g., family members, etc.), please make sure that they are aware of this privacy policy and only share their personal data with us if you have been permitted to do so and if the personal data in question is correct.

The processing of your personal data is based on the principles of correctness, lawfulness, transparency, data minimisation, proportionality, accountability, and data security.

Offer of products and services of Generali Investments

Generali Investments offers its products and services only to customers with a company or domicile in Switzerland and only within Switzerland. For individual products, further restrictions may also apply in Switzerland.

If you are a person domiciled outside Switzerland and are interested in our products, we recommend that you contact a Generali Group representative in your area or contact one of our branches or subsidiaries via their website ([generali-investments.com](https://www.generali-investments.com)).

Scope

Please take note of the following privacy policy. Our privacy policy is based on the requirements of the Swiss Data Protection Act (DPA) and, where applicable, the European General Data Protection Regulation (EU GDPR). Although the GDPR is a regulation of the European Union (EU) or the European Economic Area (EEA), it may also be relevant to Generali Investments Switzerland in part for various reasons. In individual cases, further data protection information may regulate specific circumstances. There are exceptions to the obligation to provide information under data protection law: This obligation does not apply if the information is not possible or requires a disproportionate effort, if you are already informed about the data process-

ing if the processing is provided for by law or if we are legally obliged to maintain confidentiality.

Person responsible for data processing (controller)

The following person is considered to be responsible for the processing of your data:

Generali Investments Switzerland Ltd.
Soodmattenstrasse 10
8134 Adliswil
Switzerland

You can contact our data protection officer by e-mail at privacy.ch@generali.com or by mail at the above address with the address suffix “Data Protection Officer”.

Data categories and legal basis for data processing

Generali Investments attaches great importance to the protection of your privacy and the confidentiality of your data when processing it, as well as when visiting our website.

When processing your personal data, we comply with the respective applicable provisions of Switzerland, the EU and other applicable local laws governing the storage, processing, access, and transfer of personal data. To protect your customer data, Generali Investments has adopted internal data protection directives, compliance with which is

ensured through training of our employees and appropriate processes.

The processing of your personal data is indispensable for pension and/or (transaction-related) investment advice geared to you. The conclusion or execution of a contract for the purchase or sale of investment funds is not possible without the processing of your data. We primarily process the personal data that we receive from our customers and other business partners in the course of our business relationship with them and other persons involved, or that we collect from users in the course of operating our website. Your data will only ever be used for the purpose that was specified, for example, when it was collected, for which you have consented, which is evident from the circumstances, or which is provided for by law.

The personal data processed by Generali Investments includes personal data provided by you as well as publicly available personal data. The categories of data are:

- **Personal data and contact information:** This includes, but is not limited to, first and last name, gender, date of birth, age, marital status, languages, nationality, e-mail address, telephone number, copies of identity cards, powers of attorney;
- **Customer and contract data:** This is data that arises in connection with the conclusion or execution of a contract, including, for example, contract number, name of the investment fund, number of fund units;
- **Financial and payment data:** This includes, for example, payment details, subscription and redemption amounts, securities account balance;
- **Data in connection with legal disputes:** This includes, in particular, data concerning complaints about the contracts concluded;
- **Personal data requiring special protection:** This includes, for example, data on administrative and criminal prosecutions or sanctions;
- **Online communication data:** Data related to online communication between you and Generali Investments;
- **Data related to the marketing of products and services:** This includes information such as consulting and contact details, documents received and special activities;
- **Technical data:** This includes, for example, IP address, cookies, metadata, logs recording the use of our systems, IP packets, and other technical identification data, data related to online/telephone communications;
- **Other data:** To the extent permitted, we also obtain certain data from publicly accessible sources (e.g., commercial register, press, Internet) or receive such

data from other companies within the Generali Group, from authorities or other third parties.

Scope and purpose of data processing

We use the personal data we collect primarily to process and manage purchases or sales of investment funds with our clients and business partners.

In addition, we process personal data as far as we can invoke a justification:

- Fulfillment of statutory and other legal requirements in Switzerland and abroad (e.g., from self-regulations, industry standards, official directives and internal requirements, e.g. to combat money laundering and terrorist financing, clarification of legal and reputational risks, filing of reports, fulfillment of disclosure, information or reporting obligations, archiving, processing of complaints and other reports, monitoring of communications, internal or external investigations, disclosure of documents to authorities, support in the prevention, detection and clarification of criminal offences and other violations). For these purposes, we process in particular personal data, contract and payment data, communication data and, under certain circumstances, behavioural data;
- Initiation, conclusion, administration, and processing of contracts for investment funds (esp. acquisition, advice, support as well as for pension and financial analysis, financial, pension, inheritance and estate planning or for the pension check, processing and review of applications including the appropriateness check of the investment, processing and administration of contracts including the forwarding of data to our cooperation partners. For this purpose, we process in particular personal data, contract data, financial data and communication data.
- Risk management, legal compliance (e.g., risk audits, internal and external investigations, legal proceedings, corporate governance and development). For this purpose, we process in particular personal data, contractual data and financial data, but also behavioural and communication data.
- Your data is also regularly cross-checked against the sanctions lists of the United Nations, the European Union, the Swiss State Secretariat for Economic Affairs (SECO), HM Treasury and the U.S. Office of Foreign Assets Control (OFAC).
- Market research and product development (e.g., analysis of the use of our offers, evaluation and improvement of existing offers and development of new offers). For this purpose, we process in particular your personal data, your behavioural data and your

preference data, but also communication data and information from customer surveys, polls and studies and other data, e.g., from media monitoring services, from the media, from social media, from the Internet and from other public sources.

- **Customer service:** As part of our customer service, it is possible for our service units to contact you. Generali Investments processes your personal data within the framework of our service units to arrange appointments for advisory meetings and support for existing customer relationships.
- **Holistic advice:** We continue to use the data for an overall assessment of your financial situation and a customer relationship with Generali Investments, for example for holistic pension and investment advice (needs-based advice and support), including acquisition and application support as well as for comprehensive information provision.

In this context, Generali Investments also processes your personal data for quality control, customer surveys, for advertising purposes, statistical evaluations, for market and opinion research, such as customer satisfaction surveys, implementation of events, general customer communication and the personalised adaptation of Generali Investments' offers, as well as for the creation of customer profiles. This may also include processing the data for the evaluation, offer, new and further development of our products, services and website.

Marketing purposes include all activities of Generali Investments that can be used to acquire customers or expand existing customer relationships. For example, we use your behavioural, preference and contract data for analyses to further develop existing products, offer them to you and develop new products and services.

In order to address existing and potential customers with marketing measures that may be of particular interest to them, we process not only personal information and contact data, but also other data that helps us to determine or personalise the target group and the content of marketing communications. This also includes data from interactions with us, e.g., regarding usage behaviour on our website, as well as data from other public sources.

For individualised and targeted advertising, for the submission of offers and in order to better meet your needs, we may also create personality profiles about you and divide you into so-called advertising groups. Certain marketing measures may be carried out by or in cooperation with commissioned processors and cooperation partners, joint controllers or other third parties commissioned by us.

- You can object to marketing campaigns and personalised advertising at any time by contacting the data protection officer.

We consider data processing to be permissible on the basis of our overriding legitimate interest or on the basis of consent granted.

- **Statistics and traceability:** We also process your personal data to compile fund-specific statistics, usage statistics and analytical evaluations, for example to meet regulatory requirements or for risk management purposes.

In doing so, your data may be processed for the further development of our investment fund business, in particular also in the field of artificial intelligence.

To further develop our existing products and services (incl. our website) and thereby provide you as a customer with an optimal offer, we use the possibility of market and opinion research so that we can better identify your needs and wishes. For this purpose, we use your contact, contract and customer data and analyse, for example, how you navigate through our website or which products are used by which groups of people and in what way.

In addition, we use information from customer surveys, polls and studies as well as other information, e.g., from the media, social media, the Internet and other public sources. In this context, we may also obtain data from third parties or from cooperation partners.

If possible, we use anonymised data for our surveys or anonymise or pseudonymise the data in the course of the statistical process. In certain cases of statistical or scientific surveys or research, we receive data from third parties and merge them with our data. In addition, data may be disclosed to contract processors, cooperation partners, joint controllers or other third parties for the aforementioned purpose. The disclosed data will be processed by the respective company for the intended purpose.

We consider the data processing to be permissible due to our overriding legitimate interest, whereby this consists of improving our products, services, and internal processes.

- **Verification of lawfulness and legitimate interests:**

In addition, we process your personal data beyond the actual performance of the contract in order to protect legitimate interests of us or third parties. This may be necessary in particular (examples):

- a) to ensure IT security and operations and to protect our employees and assets.
- b) to ensure data accuracy, where we may purchase data or match address data to validate existing customer master data, with possible contact in the event of discrepancies.

- c) for sales support and for quality and satisfaction surveys.
- d) to develop offers and advertise products of Generali Investments and our cooperation partners.
- e) for corporate governance and in the context of restructurings and transactions.
- f) assertion or defence of legal claims in connection with legal disputes and official proceedings.
- g) for the enforcement of and defence against legal claims, for the prevention and investigation of criminal acts.

Furthermore, we process your data to comply with regulatory and legal obligations and to ensure that laws, guidelines, requirements, and internal directives are observed. For example, we process your data for legally required reports to authorities that serve to prevent, detect or clarify criminal offences or other violations. This includes, among other things, the duty to provide information, the duty to inform or the duty to report in connection with duties under supervisory and tax law. In addition, we need your personal data to fulfill legal obligations such as regulatory requirements, commercial and tax retention obligations, or our obligation to provide advice. Should we wish to process your personal data for a purpose not mentioned above or on other legal bases, we will inform you of this to the extent necessary. For individual reviews where special technical knowledge or extended expertise is required, we may call in cooperation partners or other third parties to assess and/or process the case. The data must be retained for at least 10 years from the termination of the contract. After expiry of the corresponding retention periods, your data will be deleted.

- **Other purposes:** We also process your data for other purposes, e.g. as part of our internal processes, for administrative purposes, for training and for quality assurance, to protect customers, employees and other persons, and to protect the data, secrets and assets of Generali Investments or those entrusted to Generali Investments.

In the process, your data may also be processed for

- a) inquiries via chats, e-mails, phone.
- b) optimisation of the website (adaptation of the website to your needs).
- c) defence against and recording of hacking attacks.
- d) warranties of business operations, especially information technology, our website and systems.
- e) video surveillance to maintain house rules and other measures for IT, building and facility security, to protect our employees, other persons and assets entrusted to us (e.g., access controls, visitor lists, network and mail scanners). We also use video surveillance to protect our customers, our

data, the trade secrets and assets entrusted to us, and the security of our systems and our buildings.

- f) communication with third parties and processing of their requests, provided that there is a justification.
- g) records and management information and other reports on customers, transactions and activities, offerings, and other business aspects of Generali Investments for the purposes of managing and developing the Company, its offerings and activities, and project management.
- We consider the data processing to be permissible on the basis of our overriding legitimate interest, whereby the interest consists in sensible company management and development.
- **Application:** When you apply for a vacant position with us, we process your data for the purpose of carrying out the application process.
- Further information about the processing of your data when applying can be found here: <https://recruitingapp-2717.umantis.com/Vacancies/5585/DataProtection/1>

Data procurement

Personal data is primarily collected directly from you (e.g., consultation). Only provide us with correct data and ensure that you are authorised to disclose the data to us.

In certain cases, we collect your data from third parties or receive your data from third parties or public authorities and process it in compliance with legal requirements. For example, we process data that we receive from public authorities in order to have the necessary data for the conclusion or execution of contracts. In addition, we process data from data suppliers or from other website operators and online networks in order to offer you the best possible service, to provide you with optimum advice and to ensure the accuracy of the data. To the extent permitted, we also obtain certain data from publicly accessible sources (e.g., commercial register, media, Internet) or receive such data from other companies within the Generali Group, from authorities, cooperation partners or other third parties.

Data sharing and transfer

a) Fundamental:

We protect your data, always process it confidentially and do not sell it to third parties.

Due to the complexity of today's data processing procedures, we sometimes use service providers and commission them to process your data or give them access to your data for a specific purpose (e.g., if required for the conclusion or execution of a contract or for other purposes mentioned in this privacy policy). In particular, your personal data may be disclosed to

appointed third parties acting for us or on our behalf so that they are able to further process the data in accordance with the purpose for which it was originally collected or for another legally or contractually permissible use. Generali Investments may also outsource business areas, individual value-added steps thereof and/or services (e.g., IT, asset management) in whole or in part to third parties in Switzerland and abroad. We may also pass on personal data to branches or companies of the Generali Group. All such contracted third parties have clear instructions so that your personal data is only processed for the agreed purposes.

Some of these service providers may be located outside of Switzerland and also outside of Europe, and in principle worldwide, in particular wherever branches of our group of companies are located. When using service providers, however, we always ensure that the relevant data protection regulations and data security standards are observed and that confidentiality and, where applicable, secrecy are always maintained when processing the data.

The control and responsibility regarding the use of data and information according to this privacy policy remains with us as the responsible person (controller). It may happen that certain data is stored or processed on computers or computer systems located in other jurisdictions that do not have the same level of data protection as Switzerland. In such cases, we will ensure that appropriate safeguards are in place that require the relevant data processors to implement data protection measures comparable to those in Switzerland.

We are part of the Italian Generali Group and therefore conduct certain business processes partly in central service units and data processing systems of the Generali Group. If we transfer data to a country without adequate legal data protection, we ensure an adequate level of protection by using appropriate contractual provisions (e.g., on the basis of standard contractual clauses of the European Commission) or on the basis of so-called Binding Corporate Rules, or we rely on the legal exceptions such as consent, contract execution, establishment, exercise or enforcement of legal claims, and overriding public interest in published personal data.

Furthermore, within the scope of our business case processing, it may be necessary for us to transfer or jointly process your data within our company or within the Generali Group. Your data may also be disclosed to other responsible parties or cooperation partners. As described, we work with third parties who process your data on their own or under joint responsibility

with us. We consider these third parties to be any natural or legal person, authority, institution, or other body that does not belong to the Generali Group or to the order processors. In particular, we include our cooperation partners and the following categories:

- distribution and other contractors
- telephone services
- postal and general services
- experts such as attorneys at law, notaries
- authorities and offices in Switzerland and abroad
- other parties in potential or actual legal proceedings
- other third parties such as banks

b) Disclosure of data to supervisory authorities and courts as well as to other third parties

As a financial institution, we are subject to high regulatory requirements and constant supervision by the authorities. In this context, we may have to disclose personal data of our investors to authorities, courts, auditors, etc., as part of their statutory duties in response to their requests. In all these cases, however, we always ensure that the legal requirements are complied with.

c) Data processing within our Group

In order to fulfill our contractual obligations, certain services of Generali Investments are partly provided by legally independent companies in Switzerland and abroad (e.g. by specialised Group companies of the Generali Group. In the context of the purpose of the contractual relationship, Generali Investments relies on the transfer of data within the Group as well as outside the Group.

d) Foreign transfers to certain third countries:

If data is transferred to a country without adequate data protection, we ensure adequate protection by using sufficient contractual safeguards (e.g., based on the EU standard contractual clauses, Binding Corporate Rules, or we rely on the exception of consent, contract performance, establishment, exercise or enforcement of legal claims, overriding public interests, the fact of publication of data, or because it is necessary to protect the integrity of the data subjects).

Duration of data retention

We process the collected data for as long as is necessary in compliance with the statutory retention periods (accounting, statute of limitations, company law) and to fulfill our stated processing purposes as well as on the basis of our overriding legitimate interests (in particular to prove or defend against claims and to prove good data governance), i.e., for example, for the duration of the entire business relationship (from the initiation, processing to the

termination of a contract) as well as beyond that in accordance with the statutory retention and documentation obligations. In this context, personal data may be retained for the time during which claims can be asserted against our company (e.g., during the statute of limitations period) and to the extent that we are otherwise obligated to do so, or legitimate business interests require it (e.g., for evidentiary and documentation purposes). As soon as your personal data is no longer required for the above-mentioned purposes, it will generally be deleted.

In addition, we comply with documentation obligations or process your data based on obligations to provide evidence and proof. In this context, it is possible that personal data will also be retained during the period in which claims are asserted against Generali Investments or insofar as we are otherwise obliged to do so by law or by the authorities or legitimate business interests require this. As soon as your personal data is no longer required for the above-mentioned purposes, it will be deleted or anonymised as a matter of principle and to the extent technically possible. For operational data (e.g., system logs, logs), generally shorter retention periods apply than for personal data.

Communication with Generali Investments

We communicate with you as a customer in a variety of ways, mostly based on the contractual basis or your request for advice, as well as our legitimate interest in communicating with you and in further developing our offerings and customer relationship. We also understand your use of the respective means of communication as your consent to data processing for the respective (stated) purpose. If the communication takes place with regard to purchases or sales of investment funds, the additional legal basis for the processing is the contractual initiation or execution of a contract.

a) Electronic communication and e-mail:

We are concerned about your data security and take appropriate technical and organisational security measures to prevent possible misuse within our systems. If you send us personal data via an open network or over the Internet, this is not always protected by appropriate encryption mechanisms. Despite extensive technical and organisational security measures, it is possible that data may be lost or intercepted and/or manipulated by unauthorised persons.

Generali Investments is therefore in no way liable for any damage that you may suffer as a result of data loss or manipulation. The Internet is a worldwide open network. If you transmit personal data via the Internet, you always do so at your own risk and are liable for any misuse of data or loss of data.

It is not possible to guarantee data security for e-mails

sent to us unencrypted, which is why Generali Investments excludes any warranty and liability. As an alternative to encrypted e-mail communication, we therefore recommend that you contact us by letter.

By voluntarily providing your e-mail address, you are using the services offered by Generali Investments and agree in principle that documents relating to your contract(s) may be sent to you by e-mail.

Secure shipping is always important to us. Before we send you documents, we therefore check what protection your documents require. If you do not yet have a suitable electronic delivery method, you will continue to receive your documents by mail for the time being. If you want to send us an e-mail with confidential content, it should be encrypted to prevent unauthorised access or falsification during transmission.

b) Duties of care of the user in e-mail communication:

You are responsible for providing us with a valid e-mail address to which only you have access. You must therefore keep all access data appropriately secured.

We will not send you the documents sent to you digitally again by post, unless legal regulations or contractual agreements stipulate otherwise. You are obliged to regularly check whether you have received electronic documents from us. If your e-mail address changes, please inform us immediately.

At times, the sending of electronic contract mail may be restricted or excluded. Reasons for this include, for example, disruptions to technical equipment, network, and communication connections, as well as maintenance work or force majeure. If there is reasonable suspicion of misuse of digital contract mail, we will block digital dispatch. We will notify you of this as soon as possible by letter post.

c) Phishing:

Phishing scammers forge e-mails and websites in order to obtain your confidential data, such as passwords or other sensitive data. Please note that we will never send e-mails or text messages asking you to provide strictly confidential personal data such as your bank account details, credit card number or password, sometimes with bizarre reasons (e.g., expiry of the investment fund).

Data subject rights

a) Initial situation – identity verification:

In order to avoid abuse, the exercise of your rights requires that you clearly prove your identity (e.g., by a copy of your identity card or passport), unless we can otherwise clearly identify you.

b) Basic information about your rights:

If your data is processed by us, you may, within the framework of the applicable data protection law and

the purpose of processing, unless otherwise stated, at any time and in principle free of charge, assert the following rights as follows.

c) Right to information:

You have the right to request information from us as to whether and which of your data we process. You can submit your request for information to our data protection officer in writing or by e-mail, enclosing a copy of your identity card or passport (unless your identity is otherwise clear, or you can be identified).

d) Right of rectification:

You have the right to have us correct data if it is incorrect. If we have stored incorrect personal data about you, we will be happy to correct it based on your notification.

e) Right of deletion:

You have the right to request the deletion of data that is not absolutely necessary for the execution of the contract, that is not processed on the basis of an overriding interest on the part of Generali Investments or a legal basis (e.g., retention obligations). If the deletion proves to be technically impossible or involves a disproportionate effort, we may reject your request for deletion.

f) Right to restrict processing:

In certain cases, you have the right to restrict processing (e.g., if the accuracy of the data is disputed or unlawful processing is claimed).

g) Right to object:

You have the right to object to the processing of your data with immediate effect for the future, in particular if the processing is carried out to protect our legitimate interest.

h) Right to withdraw consent (opt-out):

You have the right - insofar as the processing of your data is based on your consent - to revoke your consent with immediate effect for future processing. However, this is only possible if the data processing is not required in connection with contractual obligations. Important: If you have given us consent for the processing of data, you can withdraw this consent at any time with effect for the future.

i) Data portability:

You have the right to request that we provide certain personal data in a commonly used electronic format or transfer it to another controller.

j) Exercise your rights:

In the event of a violation of your rights, you have the option of filing a complaint with the responsible data protection officer.

For all your concerns, we ask that you contact us at the contact address shown above, always requesting proof of

your identity, such as by submitting an electronic copy of your identity card.

If you are of the opinion that Generali Investments is not complying with applicable data protection regulations vis-à-vis you, we recommend that you first contact the competent data protection officer mentioned above. However, you can also file a complaint directly with the competent data protection supervisory authority:

Switzerland

Federal Data Protection and Information Commissioner
Feldeggweg 1
CH-3003 Bern

Legal basis for the processing of your data

Generali Investments processes your personal data on the following legal basis:

Contract performance:

- fulfillment of a legal obligation.
- consent of the customer.

Legitimate (overriding) interests:

- comprehensive customer service.
- efficient and effective protection of customers, employees and others.
- protection of data, secrets and assets.
- security of systems and buildings.
- compliance with legal and regulatory requirements and internal rules.
- efficient and effective customer service, liaison and other communications with customers outside of contract execution.
- maintaining and safe, efficient and effective organisation of business operations, including safe, efficient and effective operation and successful further development of the website and other IT systems.
- sale of products and services.
- meaningful business management and development.
- tracking customer behaviour, activity, presence and needs, market studies.
- efficient and effective improvement of existing products and services and development of new products and services.
- implementation of advertising and marketing.
- the prevention of fraud, misdemeanors, and felonies, as well as investigations related to such offences and other inappropriate conduct, handling legal complaints, and proceeding.
- participation in legal proceedings and cooperation with authorities.
- the assertion, exercise or defence of legal claims.

Consent:

- By entering into a contract, sending an e-mail or otherwise actively doing so, consent for the related data processing may be implied (explicitly or implicitly).
- By using the respective website, you consent to the processing of the data collected about you in the manner and for the purposes described.
- You can object to the data collection and storage at any time with effect for the future.

Update

Generali Investments may revise this privacy policy from time to time. Any changes to this privacy statement will be communicated immediately on this website.

Generali Investments reserves the right to adapt this privacy policy at any time without prior notice, in particular to current legal requirements and changed business processes.

The last update of this privacy policy was on 1 September 2023.