

## Privacy Policy

### 1. Introduction

The EU General Data Protection Regulation 2016 (the **GDPR**) and the Swiss Data Protection Act 2020 (the **SDPA**) - including their ordinances - aim to protect the “rights and freedoms” of natural and legal persons and to ensure that personal data is not processed without their knowledge. Richfox Capital Investment Management AG and its group entities (**Richfox Capital**) are obliged to follow these rules.

The GDPR has been in force since May 2018 and regulates the data protection practices of any companies which deal with all personal data of private individuals in the EU, irrespective of whether these companies are based in the EU or not.

### 2. Definitions

In this privacy policy (the **Privacy Policy**), the following definitions apply:

**AML Data** means any Personal Data collected for AML/KYC purposes, as applicable, such as copies of identification documents, proofs of address, account statements, criminal reports, CVs, source of funds and wealth information.

**EU Adequacy Decisions** mean the determination of an EU's executive branch or the European Commission whether a third country has an adequate level of data protection, as per the GDPR.

**Personal Data** means any information relating to an identified or identifiable natural and legal person. An identifiable natural person is one who can be identified, directly or indirectly, in particular, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Website** means [www.richfox.com](http://www.richfox.com), website of Richfox Capital.

### 3. General principles

It is Richfox Capital's policy to ensure that compliance with all relevant rules and regulations is clear and demonstratable at all times. We have a few fundamental principles:

- We are thoughtful about the personal information we ask you to provide and the personal information that we collect about you through the operation of our services.
- We store personal information for only as long as we have a reason to keep it.
- We aim to make it as simple as possible for you to control what information on your website is shared publicly (or kept private), indexed by search engines, and permanently deleted.
- We help protect you from overreaching government demands for your personal information.
- We aim for full transparency on how we gather, use, and share your personal information.

### 4. Privacy policy

***What data we collect through the Website***

We collect only the data that we need to respond to your inquiries or to provide you with the services you request from us. Specifically, we collect the Internet Protocol (**IP**) address of the device you use to browse the Website. This data on its own is anonymous and we are unable to identify you on this alone. Personal identification information (name, email address, phone number, etc.). We also collect cookies, which are small files that a site or its service providers embed on your computer (with your permission) to enable the site's or service providers' systems to recognize your browser and capture and retain certain information. For more information on how we use cookies, and how to change your cookies preferences, please read our Cookie Policy.

### ***Optional information sharing***

If you choose to contact us directly, the contact form on our Website collects your name, email address, contact number, company name and any free text field information you choose to include.

At the completion of a contact form, your IP address is no longer anonymous, and we will be able to identify you by the combination of your IP and contact information.

### ***Internationally transferred information***

Personal information that you share through the Website may be transferred internationally, including to or through areas where the standards for data privacy differ from those in force in Switzerland. Some of these countries may not be among those listed by the EU Adequacy Decisions. Please see the section below for additional detail.

### ***Why we collect your data***

We collect your data for the following purposes:

- To fulfil a contract to supply our goods or services.
- For legal compliance, such as to fulfil our AML/KYC compliance duties or for due diligence purposes.

### ***How is your data collected***

- We may collect certain sensitive information from clients manually to fulfil AML/KYC requirements including but not limited to passports, KYC forms, source of funds statement, bank references, bank account balance and signatory information and copies of statements, criminal background information, proof of residence address.
- We may collect certain sensitive information from clients or potential clients manually to fulfill due diligence requirements including but not limited to passports of intended clients and related information such as full name, nationality and date of birth as well as residence address, telephone numbers, email addresses, marital status, CVs and criminal background information and proof of residence address.
- We may collect certain sensitive information from clients or potential clients manually in the process of procuring an agreement with you. Such information and requirements may include but not limited to passports of intended shareholders and related information such as full name, nationality and date of birth as well as residence address, telephone numbers, email addresses, marital status (as required for the regulators in Switzerland or other countries, as applicable) CVs and criminal background information and proof of residence address.

- Information is also collected automatically (with your consent) from Cookies. Cookies are discussed in more detail in our Cookie Policy. You can always disable Cookies by clicking the “Privacy and Cookie Statement” on our Website.
- Information may also be collected and stored via various newsletters and/or the contact form on our Website.
- Personal Data that Richfox Capital collects through forms on the Website may be collected and processed by the third-parties service providers of Richfox Capital.

### ***How we store your data***

We securely store your data in our cloud database. We use the following technical measures to prevent data breaches:

- Encryption, adequate password protection, firewalls and regular computer updates.
- Ongoing security reviews.
- Back-up and restore facilities.
- Regular testing of contingency plans and security.
- Educating staff about how to keep information secure, including hacking, phishing and other malware issues.
- Ensuring policies on IT and related device use are kept up to date.
- The AML Data are stored on Google Drive. Please see more information on how Google stores your data on the Google privacy website.

### ***How we use your data***

Where you provide it, and consent, your email address may be used:

- to send you information and updates related to your specified interests;
- to send you occasional company news, updates, and
- to provide related product or service information.

We collect website performance data, which includes visitor IPs and cookies, to understand:

- how many users visit our site;
- how users interact with our site; and
- how we can improve site performance.

We use your data to conduct due diligence, to use your data to satisfy legal requirements and to fulfil a contract. We may use the information you provide to improve the effectiveness of our advertising and marketing campaigns, and to improve, modify or otherwise enhance our products and services for the benefit of our customers.

### ***How long will your information be stored for***

- We keep your data only as long as is necessary in accordance with our policies or applicable laws. Once the respective time period has expired or the internal decision has been taken, we will delete your data from our cloud and destroy any hard copies in our possession.
- The AML Data are stored for the period of 10 years. Once this time period has expired, we will delete your data from our cloud and destroy any hard copies in our possession.
- You can notify us anytime in case that you'd like to be removed from our contact lists.

### ***Disclosure of your information to outside parties***

- Richfox Capital does not sell, trade, or otherwise transfer your Personal Data to outside parties without your express consent.
- Express consent to share your Personal Data is not required in the case of trusted third parties who assist us in operating our Website, conducting our business, or servicing you, so long as those parties agree to keep your information confidential.
- Richfox Capital does release your Personal Data in cases where we believe such release is necessary to comply with the law, enforce our site policies, in its duty to conduct AML/KYC process or protect our or others' rights, property, or safety.
- Non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

### ***Third-party offers***

Occasionally, at our discretion, we may refer to third-party products or services on our Website. Use of these third-party products or services will require your acceptance of a services agreement. These third parties have separate and independent privacy policies. Richfox Capital has no responsibility or liability for, nor direct control over, the content and activities of these third parties.

### ***Data protection rights***

Richfox Capital would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

- The right to access – You have the right to request for copies of your Personal Data. We may charge you a fee for this service as per our standard hourly rate.
- The right to rectification – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request we complete the information you believe is incomplete.
- The right to erasure – You have the right to request that Richfox Capital erase your personal data, unless the data are required to be stored in accordance with the applicable laws.
- The right to restrict or object processing – You have the right to request that Richfox Capital restricts the processing of your personal data, unless the data are required to be processed in accordance with the applicable laws.

- The right to data portability – You have the right to request that Richfox Capital transfer the data that we have collected to another organization, or directly to you, in accordance with the applicable laws.

Please note that any questions on this Privacy Policy or requests under the rights listed above must be made in writing either via email to [operations@richfox.com](mailto:operations@richfox.com) or by a letter sent to the following address: Richfox Capital Investment Management AG, Bahnhofplatz 8832, 6300 Zug, Switzerland.

Please be aware that requests for rights may require subsequent verification procedures to confirm the requestor's identity.

#### ***How to contact authorities***


Should you wish to report a complaint or if you feel that Richfox Capital has not addressed your concern in a satisfactory manner, you may contact the Federal Data Protection and/or Information Commissioner (FDPIC).

#### **5. Amendments**

We may, solely at our discretion, make changes or updates to this Privacy Policy. The amended Privacy Policy shall always be disclosed on the Website, but Richfox Capital has no obligation to notify the changes to the Privacy Policy.

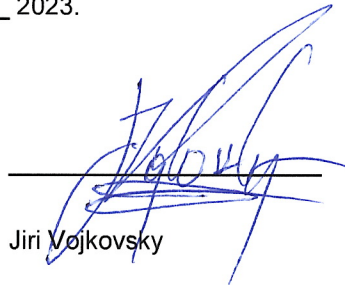
#### **6. Entry into force**

This policy enters into force on 17 August 2023.



Marcus Fuchs

Chairman of the Board of Directors



Jiri Vojkovsky

Vice-chairman of the Board of Directors