

DATA PRIVACY NOTICE

ISP Securities AG (hereinafter "we", "us" or "our") is committed to protecting and respecting your privacy. This data privacy notice explains how we collect, use, store, share and protect your personal data when you visit our website <https://ispgroup.com/> (the "Website") or interact with us in any other way. It also informs you about your rights and choices regarding your personal data.

We are the data controller of your personal data, which means that we are responsible for deciding how and why we use your personal data. Our contact details are:

ISP Securities AG

Bellerivestrasse 45

8034 Zurich

Switzerland

Tel: +41 43 499 14 00

Email: info@ispgroup.com

WHAT PERSONAL DATA DO WE COLLECT AND WHY?

We may collect and process the following personal data about you:

- Information that you provide to us voluntarily, such as your name, email address, phone number, company name, position, country and any other information that you choose to share with us when you fill in a contact form, subscribe to our newsletter, request a brochure, register for an event, apply for a job or communicate with us by email, phone or otherwise.
- Information that we collect automatically, such as your IP address, browser type, device type, operating system, referral source, pages visited, duration of visit, language preferences and other technical and statistical information when you access and use our Website. We use cookies and similar technologies to collect this information.
- Information that we obtain from third parties, such as our business partners, service providers, public sources, social media platforms or other organisations that we work with or that you have authorised to share your personal data with us.

WE USE YOUR PERSONAL DATA FOR THE FOLLOWING PURPOSES

- To provide you with the information, products and services that you request from us or that we think may be of interest to you, based on your preferences and consent where required.
- To communicate with you and respond to your queries, feedback, complaints or requests.
- To manage and improve our Website, products and services, and to ensure their security, functionality and performance.
- To analyse and measure the usage, effectiveness and reach of our Website, products and services, and to conduct market research and customer satisfaction surveys.
- To comply with our legal and regulatory obligations, such as anti-money laundering, tax, accounting, reporting and audit requirements.
- To protect and enforce our rights, interests and property, and to prevent and detect fraud, misuse, abuse, breach of contract or other unlawful or unauthorised activities.
- To pursue our legitimate interests or those of a third party, such as our business development, marketing, research, innovation, risk management, quality control, network security or corporate governance, unless they are overridden by your interests or fundamental rights and freedoms.

ON WHAT LEGAL BASIS DO WE PROCESS YOUR PERSONAL DATA?

We process your personal data on the following legal bases:

- Your consent, where you have given it to us for a specific purpose, such as receiving our newsletter, participating in a survey or using cookies. You can withdraw your consent at any time by contacting us or following the instructions in the relevant communication.
- The performance of a contract or the taking of pre-contractual steps, where you have entered into or intend to enter into a contract with us, such as requesting a brochure, registering for an event or applying for a job.
- The compliance with a legal or regulatory obligation, where we are required or authorised by law or regulation to process your personal data, such as for anti-money laundering, tax, accounting, reporting or audit purposes.
- The pursuit of our legitimate interests or those of a third party, where we or a third party have a legitimate interest in processing your personal data, such as for business development, marketing, research, innovation, risk management, quality control, network security or corporate governance, and where such interest is not overridden by your interests or fundamental rights and freedoms.

WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We may share your personal data with the following recipients, subject to appropriate safeguards and confidentiality obligations:

- Our affiliates, subsidiaries and group companies, for the purposes described in this data privacy notice or as otherwise notified to you.
- Our business partners, service providers, agents and contractors, who perform functions or services on our behalf or in collaboration with us, such as hosting, IT, marketing, analytics, communication, event management, recruitment, legal, audit, compliance or other professional services.
- Our clients, investors, counterparties, intermediaries, regulators, authorities, courts, tribunals, arbitrators, mediators or other parties, where necessary or appropriate to provide you with the information, products and services that you request from us or that we offer to you, or to comply with our legal and regulatory obligations, or to protect and enforce our rights, interests and property, or to resolve any disputes or claims.
- Any other person or entity, where you have consented to or requested such disclosure, or where we are required or permitted by law or regulation to do so.

HOW DO WE TRANSFER YOUR DATA INTERNATIONALLY?

We may transfer your personal data to recipients in countries other than the country where you are located, including countries outside the European Economic Area (EEA) and Switzerland. Some of these countries may not have the same level of data protection as the country where you are located. However, we will ensure that any such transfers are subject to appropriate safeguards and comply with the applicable data protection laws and regulations, such as the standard contractual clauses approved by the European Commission or the Swiss Federal Data Protection and Information Commissioner, or other equivalent or adequate mechanisms. You can obtain a copy of these safeguards by contacting us.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will retain your personal data for as long as necessary or appropriate to fulfil the purposes for which we collected it, and to comply with our legal and regulatory obligations, or to resolve any disputes or claims. The retention period may vary depending on the nature and category of the personal data, the purpose and legal basis of the processing, and the applicable legal or regulatory requirements. We will delete or anonymise your personal data when it is no longer needed or required.

WHAT ARE YOUR RIGHTS AND CHOICES REGARDING YOUR PERSONAL DATA?

You have certain rights and choices regarding your personal data, subject to the applicable data protection laws and regulations, such as:

- The right to access, rectify, update, erase, restrict or object to the processing of your personal data, or to request a copy or a transfer of your personal data, in a structured, commonly used and machine-readable format, to another data controller.
- The right to withdraw your consent at any time, where we rely on your consent to process your personal data, without affecting the lawfulness of the processing based on your consent before its withdrawal.
- The right to lodge a complaint with the competent data protection authority, if you are not satisfied with how we handle your personal data or with the exercise of your rights.

You can exercise your rights and choices by contacting us using the contact details above, or by following the instructions in the relevant communication. We may ask you to provide proof of your identity and sufficient information to enable us to respond to your request. We will respond to your request within a reasonable time and in accordance with the applicable data protection laws and regulations. We may charge a reasonable fee or refuse to act on your request, if it is manifestly unfounded, excessive or repetitive.

This Agreement has been executed on the date set forth on the cover page of this Agreement. Each Party shall retain one complete original document.

HOW DO WE PROTECT YOUR PERSONAL DATA?

We take appropriate technical and organisational measures to protect your personal data from accidental or unlawful destruction, loss, alteration, unauthorised access, disclosure or use. These measures include physical, electronic and procedural safeguards, such as encryption, firewalls, access controls, policies, training and audits. However, no method of transmission or storage is completely secure, and we cannot guarantee the absolute security of your personal data. If you have reason to believe that your personal data has been compromised, please contact us immediately.

HOW DO WE UPDATE THIS PRIVACY NOTICE?

We may update this data privacy notice from time to time to reflect changes in our data protection practices, the legal and regulatory framework, or our business activities. We will notify you of any material changes by posting the updated data privacy notice on our Website or by other means, as appropriate. We encourage you to review this data privacy notice periodically to stay informed about how we use and protect your personal data. Your continued use of our Website or interaction with us after the update constitutes your acceptance of the updated data privacy notice.

HOW CAN YOU CONTACT US?

If you have any questions, comments or requests regarding this data privacy notice or our data protection practices, please contact us using the contact details above. We will be happy to assist you and address any concerns you may have.