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### 1. How your Personal Data is used by the Group?

At Quintet Private Bank (Europe) S.A. and its affiliates (the “**Group**”), we take privacy and confidentiality matters very seriously. We handle Personal Data in accordance with applicable data protection laws, regulations and guidelines (Data Protection Regulation) including the so called GDPR<sup>1</sup> as well as applicable local law. This means that our affiliates (“**Entity**”) at local level remain at the forefront of how we handle your Personal Data.

This Privacy Notice (the “**Privacy Notice**”) is to let you know how we look after, process your Personal Data and what your rights are with regards to your Personal Data.

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<sup>1</sup> EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the Processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (the “**GDPR**”)

## Quintet Privacy notice & professional secrecy obligations

This Privacy Notice contains information applying to you whether you are a customer of ours, a potential customer interested in our services, a shareholder or agent of a corporate client; or a third party wanting to do business with us or with which we did or do business with.

Where you have a contractual relationship with us, then this Privacy Notice is a part of your contract with us and you are bound by it.

### 2. What types of Personal Data might be processed?

The Entity you have a contractual relationship with, or the Entity you are discussing potential services with, is responsible for determining the purpose and means of Processing your Personal Data. In data privacy terms, this means that this Entity acts as a data controller of your Personal Data.

“Personal Data” means any information allowing the direct or indirect identification of an individual while “Processing” means any operation or set of operations made in relation to such data (e.g. collecting, storing and transferring data). We process different types of Personal Data as described below depending on how you interact with us.

| Type of Personal Data          | Examples of type of Personal Data  |
|--------------------------------|--|
| Contact                        | Such as your name and family name, address, email address, telephone numbers                             |
| Identity                       | Such as your ID number, social security number and tax number or signature card                          |
| Professional                   | Such as your professional background and current position  |
| Sociodemographic               | Such as your gender, date and place of birth and nationality   |
| Documentary Data               | Which are stored in documents or copies of them (for example your passport or ID card).                  |
| Open Data and Public Records   | Such as data available in public records   |
| Log data & other security data | Such as logical access control logs and systems audit trails   |
| Locational                     | Such as information on your physical location which may come from the place where you use your bank card |
| Financial                      | Such as your financial position, status and history, account number(s), personal assets and liabilities  |
| Behavioural                    | Such as your attitude to risk in investment  |

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| Type of Personal Data               | Examples of type of Personal Data  |
|-------------------------------------|--|
| Contractual                         | Such as information we collect or learn about you to provide our products or services  |
| Communications                      | Such as calls' recordings under law requirement  |
| Transactional                       | Such as details about your investments, pensions and loans   |
| Special categories of Personal Data | In principle, we do not process any Special Category of Personal Data <sup>2</sup> .<br>However, under specific circumstances, you might communicate to us Special data which will be only collected and used if the law requires us to do so or if you provided your consent for us to do so. |
| Consent                             | Such as any permissions, consents or preferences that you indicate to us such as how you would like to be contacted  |
| CCTV Recording                      | Such as video surveillance recordings when relevant for physical security of our premise   |
| Website                             | Such as cookies, please refer to Quintet website data protection cookies policy for more details   |

It is important to note that, the provision of certain information to us is required for us to decide whether to offer our services to you or to continue offering a service to you or the company for which you are representative or shareholder. Sometimes, the provision of information is also required to comply with our legal obligations e.g. in relation to certain information about your tax status or in relation to our anti-money laundering requirements. What we need from you in each circumstance will be explained to you in the relevant services application form or client profile form. If you do not provide us with the required information, we will not be able to offer certain services to you.

It is important to note that, communication of information is also required in certain cases when you are a prospect and/or you are in contact with the Bank and/or are acting as a member of staff of a third party company in relation to the Bank.

We will collect Personal Data about you (or other related parties or your business) from you, from other companies within our Group and from others as follows:

### Information you give to us:

- When you apply for our products or services or complete other forms or documentation;
- When you talk to us either in person or over the telephone;
- Correspond via emails or letters or via our website;
- If you take part in any competitions, surveys or promotions that we may run.

### Information from third parties we work with:

- Independent Financial Advisors;

<sup>2</sup> Refer article 9 of the GDPR for more details

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- Organisations that introduce you to us;
- Government, compliance and law enforcement agencies;
- Public information sources and other agencies depending on the product you applied for (such as credit reference agencies and fraud prevention agencies);
- Companies that you work for or hold shares in.

### 3. What principles we follow when we process your Personal Data?

When we process your Personal Data, we comply with the following general purposes:

- The principle of lawfulness, which requires the lawful collection and processing of all personal data;
- The principle of fairness, which obliges to collect and process in a loyal manner all personal data;
- The principle of transparency, which obliges the data subject to be informed of all processing activities relating to his personal data at the time the Data are collected;
- The principle of purpose limitation, which implies that the Data must be collected for specified, explicit and legitimate purposes, and not be further processed in a way incompatible with those purposes;
- The principle of data minimization, which implies that the Data must be adequate, relevant and limited to what is necessary;
- The accuracy of the Data;
- The principle of storage limitation of Data, which limits the retention of Data to a period not exceeding that necessary for the purposes for which it is processed;
- The integrity and confidentiality of the Data, which implies protection against unauthorized access, unlawful processing, and accidental loss or destruction.

### 4. What are the lawful basis for each type of Processing activities?

Depending on the applicable Data Protection Regulation, besides the Processing purposes listed above, we are required to state lawful basis for Processing. You will find below a reference to lawful basis for the Processing activities we undertake.

We will only process your Personal Data if we have a proper and lawful reason to do so. The overarching purpose of Processing your Personal Data is to enable us to manage our relationship with you so as to provide advice and guidance tailored to your circumstances.

| Lawful basis          | Type of Processing activities  |
|-----------------------|--|
| Contractual agreement | <p>The Processing activities based on contractual agreement are necessary before entering into a contractual relationship to:</p> <ul style="list-style-type: none"> <li>• carry out an initial risk profile and needs assessment,</li> <li>• provide investment advice to you,</li> <li>• manage your investments, execute your instructions,</li> <li>• make and manage payments due to you or instructed by you,</li> <li>• deliver other banking or real estate services and investment advice,</li> </ul> |

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| Lawful basis                     | Type of Processing activities   |
|----------------------------------|---|
|                                  | <ul style="list-style-type: none"> <li>manage fees, interest and charges on your accounts or exercise rights set out in contractual agreements.</li> </ul>  |
| Legitimate interest              | <p>A legitimate interest might be related to a business or commercial reason where it is necessary to use your Personal Data. It is in our interests to ensure that our processes and systems operate effectively and that we can continue operating; make our services more efficient; create new products and services or carry out fraud prevention activities.</p> <p>This may include Processing your Personal Data to:</p> <ul style="list-style-type: none"> <li>monitor, maintain and improve internal business processes, information and data, technology and communications solutions and services;</li> <li>manage and monitor our properties for crime prevention and prosecution of offenders, for identifying accidents and incidents and emergency situations and for internal training;</li> <li>perform assessments and analyse client data for the purposes of managing, improving and fixing data quality;</li> <li>protect our legal rights and interests;</li> <li>enable a sale, reorganisation, transfer or other transaction relating to our business;</li> <li>use your Personal Data to tell you about products which we believe may be of interest to you or for the purposes of advertising, inviting you to social events, market research or surveys, unless you have expressly opt out.</li> </ul>  |
| Legal or regulatory requirements | <p>The Processing is necessary for complying with our legal and regulatory obligations such as:</p> <ul style="list-style-type: none"> <li>share data with police, law enforcement, tax regulators or other government and fraud prevention agencies where we have a legal obligation;</li> <li>perform checks and monitor transactions for preventing and detecting crime and to comply with laws relating to money laundering, fraud, terrorist financing, bribery and corruption and international sanctions (may require us to process information about criminal convictions and offences);</li> <li>deliver mandatory communications to clients or communicating updates to product and service terms and conditions;</li> <li>assess affordability and suitability of credit for initial credit applications and throughout the duration of the relationship, including analysing client credit data for regulatory reporting;</li> <li>investigating and resolving complaints and manage litigation;</li> <li>conduct investigations into breaches of conduct and corporate policies by our employees;</li> <li>provide assurance that the bank has effective processes to identify, manage, monitor and report the risks it is or might be exposed to;</li> <li>investigate and report on incidents or emergencies on the bank's properties and premises;</li> <li>coordinate responses to business disrupting incidents and to ensure facilities, systems and people are available to continue providing services;</li> </ul> |

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| Lawful basis | Type of Processing activities   |
|--------------|---|
|              | <ul style="list-style-type: none"> <li>monitor dealings to prevent market abuse;</li> <li>provide assurance on the bank’s material risks and reporting to internal management and supervisory authorities on whether the bank is managing them effectively;</li> <li>perform general financial and regulatory accounting and reporting;</li> <li>ensure business continuity and disaster recovery and responding to information technology and business incidents and emergencies;</li> <li>ensure network and information security, including monitoring authorised users’ access;</li> <li>calls to our offices, <b>to staff mobile phones</b>, emails, text messages or other communications may be recorded and monitored to check your instructions to us; for preventing or detecting crime; to help us investigate any complaint you may make and as evidence in any dispute or anticipated dispute between you and us.</li> </ul> |
| Consent      | <ul style="list-style-type: none"> <li>confirm your identity, including using biometric information for authentication when using online services;</li> <li>Processing activities which include Special Category of Personal Data not based on legal or regulatory requirements;</li> <li>sending you certain types of direct marketing where you have provided your consent to receive such marketing</li> </ul>   |

### 5. Who do we share your Personal Data with?

#### a) Data transfers across the Group

In the context of Shared Service Centres (hereinafter “SSC”) within the Group, we may share your data amongst Entities of the Group which might be based within or outside the EEA.

#### b) Data transfers to third parties

We may also share your data with:

- third parties for the purpose of compliance with regulatory requirements, the fulfilment of our contractual obligations, self-regulation and market practices, conditions of issuers and other requirements in connection with the investments or products you have chosen (insurance companies, payment and card services providers and payment initiation providers, correspondent banks, transfer agents or custodians);
- third parties providing services to us, such as advertising and marketing providers including digital and cloud-based solution marketing and offerings, printing, market & behavioural analysis/research and benchmarking, consulting, telecommunications, IT providers including providers of cloud solutions.
- parties linked directly to you by contract such as a spouse with a joint account.

We may also be obliged to disclose data under certain laws or by order of court or other competent regulatory body or may be permitted to disclose it under applicable Data Protection Regulations.

### 6. What are the appropriate safeguards in force regarding data transfers?

When we transfer data outside of your country of application, we will ensure that the adequate Data Protection Regulations safeguards are in place. This means that if we transfer your Personal Data outside of your country, we

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will make sure that it is protected in the same way as if it was being used in your country. We will use the appropriate safeguard in line with the local law of your jurisdiction.

If you are in the EEA, we will use one of the following safeguards:

deploy adequate contractual guarantees based on EU standard contract clauses and supplementary measures recommended by the European Data Protection Board to ensure effective compliance; or

process such transfer under one of the exceptions permitted by law, for example with your consent, or for the assertion or enforcement of legal claims, or in pursuit of an overriding public interest or because the transfer is necessary to protect the physical integrity of a data subject.

If you want to know more about these types of transfers, you can contact us using the contact details below (see Section 10 below).

### 7. How do we use automated tools and profiling?

#### How we use profiling?

“Profiling” uses aspects of an individual’s personality, behaviour, interest and habits to make predictions or decisions about them.

As is common practice in our industry, we use profiling to:

- find something out about your preferences so that we can offer you best in class service. We might process your personal data for direct marketing purposes using profiling. As a data subject, you might provide your consent and/or might object to such processing activity where related to direct marketing purposes
- tailor products and services; to assess your suitability for certain products before providing portfolio management or advisory mandate. When we provide wealth planning services we use internal and external profiling tools to help us ascertain your risk profile. We may also place you in groups with similar clients, known as customer segmentation. We use customer segmentation to learn about our clients’ needs and guide us when designing products and services for different customer segments, and to manage our client relationships;
- assess credit worthiness: we use a system to help us decide whether to lend money to you or your business. This system is called credit scoring and it uses current and past data about you to assess how you are likely to act while paying back any money you borrow;
- as part of our regulatory and legal requirements, to control and detect money laundering, terrorism, fraud and assess risk of offences. We may analyse transactional data amongst other activities to identify potential suspicious patterns.

#### How do we use automated decision-making Processing?

As part of the provision of our services to you, we sometimes use automated tools to help us make decisions based on Personal Data we have, or are allowed to collect from others, about you, your business or other related parties. We use these automated tools to inform our decision making – we do not rely on them solely to make any decisions and the final decisions lie with members of our banking and advisory teams.

#### How do we use cookies?

**Refer to our** Quintet website data protection policy which provides you with information about what cookies we use and how we use them.

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### 8. How long will we keep your Personal Data?

We will keep your Personal Data for as long as you are a client of the Entity, we will retain your data for as long as it is required by applicable laws and regulation from the time when you cease to be a client and until when there is no other legitimate reason to keep the information.

### 9. What are your rights regarding your Personal Data?

By law, under certain circumstances, you may exercise your data subject rights to:

- Request access to your Personal Data;
- Request correction of the Personal Data that we hold about you;
- Request erasure of your Personal Data;
- Request the restriction of Processing of your Personal Data;
- Request the portability/ transfer of your Personal Data, in a machine-readable format, to another party;
- Object to Processing of your Personal Data where we are relying on a legitimate interest or on your consent (or those of a third party) and there is something about your particular situation which makes you want to object to Processing on this ground;
- Object at any time to Processing of Personal Data concerning you for direct marketing;

**Object to decisions being taken by automated means concerning you or similarly significantly affect you;**

- Withdraw your consent.

### 10. How to contact us?

To exercise your rights or have more information about this policy and how we handle your Personal Data email or write to the details below:

**Group Data Protection Officer,**

Quintet Private Bank (Europe) S.A.

43, boulevard Royal - L- 2955 Luxembourg

Email: [DPOGROUP@QUINTET.COM](mailto:DPOGROUP@QUINTET.COM)

If you are resident in United Kingdom or client of Brown Shipley & Co, you can also email or write to the details below:

**Brown Shipley Data Protection Officer,**

14th Floor, No 1 Spinningfields,

1 Hardman Square,

Manchester M3 3EB

Email: [DPO@brownshipley.co.uk](mailto:DPO@brownshipley.co.uk)

For us to help you with your request, we will need the following from you:



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- enough information to identify you (e.g. account number, user name, registration details)
- proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- a clear description of the Personal Data to which your request relates, including any account or reference numbers, if you have them.

We will respond to your requests within the applicable legal time period.

Local data protection laws will clarify how you can complain if you feel that your Personal Data hasn't been handled in accordance with Data Protection Regulation. In addition to contractual recourse you might have, you may also lodge a complaint with the data protection authority of the EU country in which you are a resident.

- If you are a resident of the EEA, please contact either the *Commission Nationale pour la Protection des données* based in Luxembourg:

<https://cnpd.public.lu/en.html>

or your local authority which you can find:

[https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)

- If you are a resident of the United Kingdom, please contact the Information Commissioner's Office:

<https://ico.org.uk/global/contact-us/>

- If you are a resident of Switzerland, please contact the Federal Data Protection and information Commissioner:

<https://www.edoeb.admin.ch/edoeb/en/home.html>

### 11. What will happen if there are changes to this policy?

We may make changes to this Privacy Notice from time to time. We will always inform you of such changes in compliance with applicable law. Please note that in some cases, if you object to such changes it may not be possible for us to continue to operate your account and/or provide certain products and services to you.

### 12. Professional secrecy obligation of the Quintet Private Bank (Europe) S.A. (the Bank) and related exemptions

Quintet Private Bank (Europe) S.A. (the "Bank"), including our staff (the members of the management body, the directors, the employees and the other persons who work for the Bank) are subject to professional secrecy obligations in accordance with Luxembourg laws, pursuant to which we must maintain secrecy about your information of which we may have knowledge or that you have entrusted us with (the "Confidential Information"). Confidential Information will only be released by us, in circumstances where we may be so obliged (e.g. when ordered by a competent court) or authorised by Luxembourg laws or, under certain circumstances and conditions, where we have obtained your consent or instructions to that effect. In particular, in the event of resolution, reorganisation and winding up measures in relation to the Bank, we may be obliged to disclose Confidential Information to authorities and/or counterparties involved in the resolution process, including (but not limited to) potential acquirers contacted in the context of the Bank's resolution.

In this context, we draw your attention to the fact that, in order to improve the efficiency and quality of the operational tasks relating to the services we provide to, and the activity we perform for, you (as applicable, such as, among others, marketing activities, banking, financial, investment and payment services) and in order for you to benefit of the full added-value services offered by us, the Bank may outsource, in whole or in part, business, control or operational functions (or any

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other relevant function as the case may be) to other Entities or to third party service providers including using cloud based and digital solutions (such other Entities and/or third party service providers, together the “**Service Providers**”).

In this context, the Service Providers may have access to and process certain Confidential Information that have been created or collected by, or communicated to (whether provided in person, by mail, email, fax, telephone or any other means) us, such as personal identification data and details (name, address, place of incorporation, identity of representatives, tax domicile, KYC documentation, etc.), as well as data relating to your business affairs (data generated by the Bank in the context of the services provided to you, business contacts, information on you or your beneficial owner, etc.).

The description and purposes of the outsourced functions, the Confidential Information that may be transferred and/or disclosed to such Service Providers as well as the country where they are located are detailed in the table below:

| Confidential Information likely to be transmitted   | Country of establishment of the Service Provider                        | Nature of the outsourced activities  |
|---|---|--|
| Any Confidential Information is likely to be transferred by the Bank in the context of the outsourcing arrangements described in this table | US  | IT hosting and solutions   |
| Any Confidential Information is likely to be transferred by the Bank in the context of the outsourcing arrangements described in this table | UK, Japan   | IT Certificate (certificate revocation list, online certificate status protocol, key generation, services for SSL/TCL) |
| Any Confidential Information is likely to be transferred by the Bank in the context of the outsourcing arrangements described in this table | Switzerland, Israel   | AML/KYC Online screening   |
| Any Confidential Information is likely to be transferred by the Bank in the context of the outsourcing arrangements described in this table | Luxembourg, Switzerland   | IT Services (BPO)  |
| Any Confidential Information is likely to be transferred by the Bank in the context of the outsourcing arrangements described in this table | Netherlands   | IT (E-signature B2C)   |
| Any Confidential Information is likely to be transferred by the Bank in the context of the outsourcing arrangements described in this table | Netherlands   | Marketing (mass mailing)   |
| Any Confidential Information is likely to be transferred by the Bank in the context of the outsourcing arrangements described in this table | Germany, France   | IT (Online ID verification)  |
| Any Confidential Information is likely to be transferred by the Bank in the context of the outsourcing arrangements described in this table | Affiliates in multiple countries including Luxembourg, UK, Belgium, US. | Business Continuity Planning   |
| Any Confidential Information is likely to be transferred by the Bank in the context of the outsourcing                                      | Switzerland, Germany, The Netherlands, Belgium, UK, Denmark             | Intra-Group services including but not limited to IT infrastructure, marketing, AML, banking operations.               |

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|                                      |  |  |
|--------------------------------------|--|--|
| arrangements described in this table |  |  |
|--------------------------------------|--|--|

We have taken reasonable technical and organisational measures to ensure the confidentiality of the Confidential Information transmitted and to protect the Confidential Information against any unauthorised processing, taking into account that the level of protection for personal data, and confidential information in general, in third-countries may not be the same as in Luxembourg. The Service Providers are either subject by law to a professional secrecy obligation or will be contractually bound to comply with strict confidentiality rules. Confidential Information that will be transferred in accordance with the purposes described above will only be accessible to a limited number of persons within the relevant Service Providers, on a need to know basis. Unless otherwise authorised by law or in order to comply with requests from or requirements of, national or foreign regulatory or law enforcement authorities, the Confidential Information will not be transferred to entities other than the Service Providers. You hereby acknowledge and accept that the Service Providers may not be subject to Luxembourg professional secrecy rules and that professional secrecy obligations applicable to them may be less stringent than Luxembourg professional secrecy legislation.

Against this background, for those recipient of the Privacy Notice who are not already clients of the Bank, we will deem that you consent authorise and empower us to transfer the Confidential Information to Service Providers, if and where necessary, in the context of the outsourcing arrangements described in the table above if we receive no written objection from you from the provision of this Privacy Notice.

Where you have a contractual relationship with us, then this clause relating to obligations of professional secrecy is a part of your contract with us. You consent to and are bound by it.

Where your consent would be further required we will notify you of any update of the Privacy Notice through appropriate means of communication, such as (but not limited to) email.