

Privacy Notice for Compass

Under this Privacy Notice (hereinafter the “**Notice**”), **Clearstream Fund Centre AG** (hereinafter “**We**” or “**Us**”) informs you how We process your personal data. Your personal data means any information relating to you (hereinafter the “**Personal Data**”), such as name or contact details.

We pay special attention on the processing of Personal Data in accordance with the Swiss Federal Act on Data Protection (“FADP”), and the General Data Protection Regulation EU 2016/679 (“GDPR”).

1. Controller

1.1 Our identity and contact details

We are a company incorporated in Switzerland in the commercial register of canton Zurich (CHE - 104.191.997). We operate a platform for the offer, distribution and placement of domestic and foreign collective investment schemes in Switzerland and abroad, as well as the provision of market information, in particular fund data, and other platform related services.

Contact details:

Clearstream Fund Centre AG
Hardstrasse 201
8005 Zürich
Switzerland
AMNetwork-CH-EMEA@fc.clearstream.com

Contact details of Our EU representative:

Clearstream Banking S.A.
42, Avenue J.F. Kennedy
L-1855 Luxembourg

1.2 Contact details for data protection related matters:

dataprotection@clearstream.com

2. Purpose, Categories of Personal Data, Legal Basis and Retention

2.1 Categories of your Personal Data and purposes of Our processing

We process the following categories of your Personal Data:

2.1.1 General contact by e-mail, post or telephone:

Name, address, telephone number or e-mail address if you wish to contact Us directly. We collect your personal data when you provide it to Us via our contact forms or when you contact Us directly. Then we process the information that you have provided to Us in the course of establishing contact. This includes, in particular, names and contact data provided (address, telephone number or e-mail address), date and reason for contact. The personal data that you collect will only be used to answer and fulfil your specific enquiries. The legal basis is Art. 6 para. 1 lit. (f) GDPR, which permits the processing of personal data for the purpose of our legitimate interest in processing and answering your enquiry. Your personal data processed in this respect will be stored by Us for as long as it is necessary to carry out our relationship (communication) with you and in accordance with the applicable legal storage regulations.

2.1.2 Sales, Marketing and invitations

We may use your personal data (name, first name, address, company, telephone number, e-mail address) to send you information about our services, partners, promotions and events that we think may be of interest to you. We may contact you by e-mail based on our legitimate interests under Article 6 para. 1 lit. (f) of the GDPR if we have a direct business relationship with you or with the company for which you work, and if you have not objected. We may contact you by telephone if you have given your consent (Article 6 para. 1 lit. (a) GDPR) or on the basis of a presumed consent on the condition that you will welcome the call. We may contact you by post on the basis of our legitimate interests under Article 6 para.1 lit. (f) GDPR as long as you do not object. In such cases, it is our legitimate interest to inform business partners or potential customers about such services and products that may be of

interest to them and thus to maintain our existing or future business relationship and the collection of market intelligence incl. gathering of requests for new products and service enhancements. Your personal data processed in this respect will be stored by Us for as long as it is necessary to carry out our relationship (communication) with you and in accordance with the applicable legal storage regulations.

2.1.3 Performance of contracts and services

If you or your company want to be authorised as a customer of one of our services, we may collect your personal data (Titles; Name; employer Work postal address; Work telephone number (Optional); Work email address; profile picture (optional); Business Title (Optional)) and a an hyperlink to your LinkedIn® profile (Optional) to register you to our service and for the usage of our service. The sole responsible body is the above company with which a contract is concluded or occurs in the case of pre-contractual measures. The purposes of personal data processing are determined by the specific service of Compass. This may include especially assessments, consultation, trading activities, relationship management, client communication, client support and the execution of business accounting and tolls. The legal basis for processing this personal data is Article 6 (1) lit. b GDPR, as processing is necessary to fulfil a contract or for pre-contractual measures between us and the customer. If the user is not the customer who concluded the contract with Us, but an employee of the customer or otherwise authorised by the customer to use our services, the legal basis for processing is Article 6 (1) lit. f GDPR, as the processing is in the legitimate interest of the customer. The legitimate interest of the customer is to enable the user to use our services in accordance with the contract. Your personal data processed in this regard will be stored by Us as long as it is necessary to carry out our relationship (registration and use of our service) with you and required by applicable statutory retention laws.

2.1.4 Communication within Compass

As a user of Compass, you will be able to use the messaging solution of the platform to send messages to other users from other companies. Similarly, other users of the service will be able to send you messages within the internal messaging system of the platform. The main feature is a messaging system shared with the users from your company assigned to a same Team. All member of your Team can access these Team messages, as well as the

members of the Recipient Team. There is also a chat messaging system where messages are only shared between the individual members of each chat conversations. The legal basis for processing this personal data is Article 6 (1) lit. b GDPR, as processing is necessary to fulfil a contract or for pre-contractual measures between us and the customer. If the user is not the customer who concluded the contract with Us, but an employee of the customer or otherwise authorized by the customer to use our services, the legal basis for processing is Article 6 (1) lit. f GDPR, as the processing is in the legitimate interest of the customer. The legitimate interest of the customer is to enable the user to use our services in accordance with the contract. Your personal data processed in this regard will be stored by Us as long as it is necessary to carry out our relationship (registration and use of our service) with you and required by applicable statutory retention laws.

2.1.5 Visibility in Compass

All users of Compass are listed into the platform's internal directory, accessible to other users. The information shown to other users is the one described under 2.1.3. Your user profile is linked to your employer and in case of a change of your employer the user profile will be deactivated, and a new user profile has to be created.

2.1.6 General use of Compass

When you use our online platform Compass, We will automatically log information about the browser that is used to access the website, such as your IP address, session time, pages viewed from that address and the website from which you are visiting the website. We may also collect device-specific information, such as your hardware model and operating system. We use this information to identify and prevent malpractice and crime and to investigate improper conduct. The legal basis for the processing of your personal data for these purposes is Art. 6 para. 1 lit. (c) GDPR in fulfilling our legal obligation to take technical and organisational measures to ensure secure data processing in accordance with Article 32 GDPR and Article 6 para. 1 lit. (f) GDPR in order to pursue our legitimate interests in data processing for network and information security. Your personal data processed in this regard will be stored by Us as long as it is necessary to carry out Our relationship (registration and use of our fund business service) with you and required by applicable statutory retention laws. If data is processed for a

longer period of time, We will anonymise or delete the data as soon as their storage no longer serves the respective purposes.

2.2 Do We make automated decisions on you?

We do not make any automated decisions solely on automatic processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

2.3 Retention periods

The retention periods for personal data depend on the purpose of the processing. We will store the personal data mentioned under 2.1 above as long as (i) this is necessary for the respective purpose and / or (ii) this is required in accordance with the applicable statutory retention laws. We will keep personal data that you provide Us for as long as our business relationship with you or with your company exists, plus all applicable retention periods that are in accordance with the statutory provisions (e.g. based on tax regulations) or to the extent they are necessary to pursue our legitimate interests after the end of the business relationship (e.g. to assert claims within the statutory limitation periods). According to Article 958f of the Swiss Code of Obligations, all business-related documents which may be relevant must be retained for 10 years (in particular contracts, personnel documents, social insurance and payroll documents). In the case of contracts, the retention period begins when they have ended. For the remaining documents, the retention period begins with the end of the financial year.

3. Transfer of Personal Data to Third Parties

We will not transfer your Personal Data to third parties except such transfer is permitted by law or you have explicitly consented to the transfer.

We may transfer your Personal Data to public authorities where this is required by the applicable law. A transfer of your Personal Data is also permitted if there is a suspicion of a criminal offence or the abuse of the services offered on our platform. In this event, We shall be entitled to transfer your Personal Data to the criminal prosecution authority.

Otherwise, your personal data will be stored exclusively in our database and on our servers or on those of our commissioned data processing providers,

which provide infrastructure, platforms, or software. We will only share your Personal Data with other controllers for their own purposes such as cooperation or advertising partners under the condition that you explicitly and voluntarily agreed to such transfer of your Personal Data; in this case, We will obtain your consent separately from this Notice.

Personal data may be transferred outside Switzerland. In those cases, except where the relevant country has been determined by the Federal Data Protection and Information Commissioner and the European Commission to provide an adequate level of protection, We require such recipients to comply with appropriate measures designed to protect personal data contained within a binding legal agreement. A copy of these measures can be obtained by contacting Us at the addresses in Section 1. If and to the extent required by applicable law (such as Swiss Banking Secrecy), We implement the necessary legal, operational and technical measure and/or enter into an agreement with you before such transfers.

4. Cookies

When you visit the website and our online platform, information is stored on your terminal device in the form of a "Cookie." Cookies are small files that are stored on your terminal device and save certain settings and data to exchange with our websites via your browser. For example, cookies enable Us to tailor a website to better match your interests or to store your password so that you do not have to re-enter it every time. As a general rule, We never collect personal data via cookies, unless you have given Us your express permission to do so.

If you do not want Us to recognize your terminal device, please configure your Internet browser to erase all cookies from your device, to block all cookies or to receive a warning before a cookie is stored.

Please note that certain functions of our website may no longer work, or not correctly, without cookies.

A. Types of cookies:

Cookies can be assigned to four categories, depending on their function and intended purpose: absolutely necessary cookies, performance cookies, functional cookies, and cookies for marketing purposes.

I. Absolutely necessary cookies

Are needed for you to navigate within websites and operate basic website functions, such as the issuance of anonymous Session IDs for bundling several related queries to a server.

II. Performance cookies

Collect information on the usage of our websites, including for example the Internet browsers and operating systems used, the domain name of the website which you previously visited, the number of visits, average duration of visit, and pages called up. These cookies do not store any information that would make it possible to personally identify the user. The information collected with the aid of these cookies is aggregated and is therefore anonymous. Performance cookies serve the purpose of improving the user friendliness of a website and therefore enhancing the user's experience.

III. Functional cookies

Enable a website to store information the user has already entered (such as user ID, language selection, or the user's location), in order to offer improved, personalized functions to the user. Functional cookies are also used to enable requested functions such as playing videos and to make a user's decision to block or disable a certain function (e.g. web analysis) - "opt-out cookies".

IV. Cookies for marketing purposes

Are used to offer more relevant content to users, based on their specific interests. They are also used to limit the display frequency of an ad and to measure and control the effectiveness of advertising campaigns. They register whether users have visited a website or not, and which contents were used. This information may possibly also be shared with third parties, such as advertisers, for example. These cookies are often linked to the functions of third-party websites.

B. Types of used cookies:

For Compass only technical necessary cookies are used.

Non-essential

Name	Provider/Domain	Expiration	Description
_pk_id	https://compass.clearstream.com/	13 months	This cookie stores a unique visitor ID and other details such as the number of visits made by visitor, the time of their first visit, the previous visit, and the current visit. If this cookie is disabled, Matomo might be able to accurately track individual users over multiple visits.
_pk_ses	https://compass.clearstream.com/	30 min	These are short-lived cookies used to temporarily store data for the visit. If these cookies are disabled, Matomo might not be able to track some details about the user's session

Necessary

Name	Provider/Domain	Expiration	Description
SESSION	https://compass.clearstream.com/	SESSION	General purpose platform session cookie, used by application servers to maintain a registered user session.
cfcdcompasext_sso	https://compass.clearstream.com/	SESSION	General purpose platform session cookie, used by the single sign-on system.
cfcdcompasextcookie	https://compass.clearstream.com/	SESSION	General purpose platform session cookie, used by web servers to maintain an anonymous or registered user session by the server.
mtmwscookie	https://compass.clearstream.com/	SESSION	General purpose platform session cookie, used by web servers to maintain an anonymous session for debugging.

5. Usage of Matomo

Subject to your consent, we use Matomo (formerly known as PIWIK) to analyse your visit on our website. Matomo is an open-source tool for web analytics. During its use, none of your data will be sent to servers outside our control. Matomo also uses cookies which are stored on the hard drive of your PC and give us no clue whatsoever on your identity. Provided your consent to the analysis via Matomo, the following data will be processed:

- 1) 2 bytes of the IP address of the user's calling system.
- 2) The accessed web page.
- 3) The web page from which the user has reached the accessed web page (referrer).
- 4) The subpages that are called up from the called-up website.
- 5) The time spent on the website.
- 6) The frequency with which the web page is accessed.
- 7) The Klicks and Actions during the visit.

The software solely runs on our servers, which is the sole place of storage for your personal data. That data will not be transferred.

6. Your Rights

Under applicable data protection laws, you have rights

- of access to, rectification of, and/or erasure of your Personal Data;
- to restrict or object to its processing;
- to tell Us that you do not wish to receive marketing information; and
- (in some circumstances) to require certain of your Personal Data to be transferred to you or a third party, which you can exercise by contacting Us at the details set out at the beginning of this Notice.

To the extent our processing of your Personal Data is based on your consent, you also have the right to withdraw your consent, without affecting the lawfulness of our processing based on your consent before its withdrawal.

To exercise your rights, you can contact Us as set out in Section 1 above. You can also lodge a complaint about our processing of your Personal Data with the Federal Data Protection and Information Commissioner using the contact

form at: <https://www.edoeb.admin.ch/edoeb/en/home/deredoeb/kontakt.html> or with the data protection authority in the EU Member State of your habitual residence, place of work or of an alleged infringement of applicable data protection laws. A list and contact details of local data protection authorities is available here:

https://edpb.europa.eu/about-edpb/about-edpb/members_en#member-it

7. Website Performance Tracking

When deciding to use this application you consent that we may store Cookie information for website performance tracking on your device as described in this privacy notice. Further information and how you can withdraw your consent can be found in section 1.2 of this document.

8. Status

This privacy notice was updated in March 2023. It is conceived as a notice explaining what We do, rather than a document that binds Us or any other party contractually. We reserve the right to amend it from time to time. If the Notice has been updated, We will take steps to inform you of the update by appropriate means.