

Section 7

DATA PROTECTION INFORMATION

A - DATA PRIVACY NOTICE

Guggenheim Investment Advisors (Suisse) S.A. (“**GIA**”) is an investment adviser who provides either advisory services or advisory and management services pursuant to the Investment Advisory Agreements entered into between GIA and you (the “**Client**” or “**you**”).

In order to provide you with the highest possible levels of service, we, GIA, may need to process data that you have provided to us or other data about your accounts that we acquire in the course of providing services to you and to disclose your personal data to our affiliates and selected third party services providers, as explained in this document.

GIA takes the privacy and security of your personal data very seriously and is committed to protecting and respecting your privacy.

This notice is designed to assist you in understanding what data GIA collects and processes and for what purpose data is being collected/processed.

GIA reserves the right, at its discretion, to change, modify, and/or remove sections from this notice of disclosure at any time. If it makes any material changes to this notice of disclosure, it will notify you by email or by means of a notice on our website.

1. What data do we collect and process?

GIA may collect and process the following data:

- Name and surname;
- Address;
- Email address;
- Telephone number;
- Gender;
- Information relating to family situation (including marital status and dependents)
- Date of birth;
- Nationality;
- Passport and/or ID card details;
- Bank account numbers and names;
- Wealth (including information regarding source and level of wealth);
- Information in respect of professional qualifications and work experience;
- Languages;
- The above-mentioned information on data subjects who are beneficial owner(s) of accounts or Clients;
- Transactions that are or may be maintained on the data subject's records; and
- Details of custodians of the data subject's or associated Client's accounts including their contact details.

2. For what purposes do we process data?

GIA may use your data for the following purposes:

- providing the services pursuant to the Investment Advisory Agreement;
- responding to your requests for information about your accounts;
- coordinating the administration of the Client relationship with GIA and Client interactions with affiliates of GIA (“**Affiliate Offices**”);
- making available products and services offered by other Affiliate Offices;
- complying with a legal or regulatory duty to disclose your data (for example if required to do so by a court or a government authority, or to prevent a fraud or another crime); and
- enforcing the terms of any agreement with you, including the Investment Advisory Agreements.

3. What are your rights as a Client?

- request us to stop processing your data. This may mean that we are no longer able to provide you with services under the Investment Advisory Agreements;
- obtain a copy of your personal data being processed;
- request any corrections or adjustments to the processed data or any rectifications or erasure of (incorrect) data;
- add
- request the restriction of the processing of the personal data in accordance with applicable privacy legislation (please note that this may mean that we are no longer able to provide you with services under the Investment Advisory Agreements); and
- contact the Federal Data Protection and Information Commissioner (Eidgenössischen Datenschutz- und Öffentlichkeitsbeauftragten, “**EDÖB**”) and/or any other public authority responsible for data protection in Switzerland, if GIA does not comply with applicable privacy legislation.

Such rights can be exercised by addressing a written request to:

Guggenheim Investment Advisors (Suisse) S.A.
Rue Saint-Léger 8
1205 Geneva

4. Who do we share your data with? (disclosure to third parties)

GIA may disclose your data to other Affiliate Offices for the purposes described in this notice. Affiliate Offices may themselves process such data to improve their services to you or to GIA. In particular, we may disclose your data to:

- our US affiliates, Guggenheim Partners Latin America, Inc. and Alvarium Investment Managers (US), LLC, for the provision of investment advisory services on our behalf;
- our UK affiliates, Alvarium RE Limited and Alvarium Investment Advisors (UK) Limited, for the provision of “know your client”, compliance and support services;

- our Portuguese affiliate, GGH Partners Portugal - Sociedade de Consultoria para Investimento, S.A. (Guggenheim Wealth Management Portugal), for the provision of support services, in particular financial reporting; and
- our Hong Kong affiliate, Guggenheim Investment Advisors (Hong Kong) Limited, for the provision of support services.

No data will be sold, traded or rented to others for their own purposes. However, GIA may share your data with selected third parties including:

- third party services providers used by GIA;
- custodians and funds in connection with the provision of the services set out in the Investment Advisory Agreements; and
- governmental or judicial bodies or agencies, regulatory and tax authorities to comply with legal and regulatory obligations.

GIA is committed to protecting your privacy and keeping your personal data secure. It will therefore take all reasonable steps to ensure the data provided by you or other data about your accounts is kept securely by Affiliate Offices and third parties and is not subject to unauthorized access or disclosure.

5. Transferring your information outside of Europe

As part of the services that we provide to you, the information you provide to us will be transferred to, and stored in, countries outside of the European Union (the “EU”). For example, we may share information with other Affiliate Offices outside the EU. These countries may not have similar data protection laws to Switzerland. If we transfer your information outside of the EU in this way, we will take steps with the aim of ensuring that your privacy rights continue to be protected as outlined in this notice.

6. How long do we retain your data?

We retain your personal data for as long as it is deemed necessary or appropriate to ensure compliance with applicable laws or as long as it meets a need for the purposes for which it was collected.

7. How do we protect your personal data?

We have the technical and organizational means to guarantee the security of your personal data. Thus, we are able to protect your data against the risk of unauthorized and illegitimate processing and/or against the risks of loss, modification, disclosure or unintentional access. You must be aware, however, that the transmission of information via the Internet and other electronic means of communication poses certain risks to security and that we cannot assume any guarantee regarding the security of the information transmitted by these channels.