

HYPOSWISS

A D V I S O R S

PRIVACY POLICY NOTICE

Hyposwiss Advisors Privacy Principles

Hyposwiss Advisors is firmly committed to safeguarding and protecting its clients' personal and financial information. Protecting client's personal and financial information is one of Hyposwiss Advisors' highest priorities.

This notice describes the information that Hyposwiss Advisors collects from clients of Hyposwiss Advisors. This notice also describes the privacy principles that Hyposwiss Advisors follows to safeguard and protect that information.

As part of Hyposwiss Advisors' business practices, Hyposwiss Advisors distributes a Privacy Policy Notice annually or when material changes are made to it.

Why Hyposwiss Advisors collects Personal and Financial Information

Hyposwiss Advisors collects personal and financial information to enable it to provide services to clients, to conduct its business and to generally manage its operations. For example, Hyposwiss Advisors collects and uses personal information to:

- verify clients' identity,
- provide clients with effective and efficient service,
- better understand clients' financial situation,
- communicate with clients using contact channels and contact information selected by clients,
- meet applicable regulatory and legal requirements,
- manage its risks and operations.

How Hyposwiss Advisors collects Personal and Financial Information

Most of the personal and financial information Hyposwiss Advisors collects is received directly from clients when clients apply for asset management services. Hyposwiss Advisors also collects financial and other information about clients, their representatives and authorized signatories, from a variety of sources, including but not limited to:

- the qualified custodian bank independently selected by clients for their designated accounts managed by Hyposwiss Advisors,
- references the client has provided to Hyposwiss Advisors,
- other financial institutions,
- publicly available information (such as those found in internet websites).

What information Hyposwiss Advisors collects

Hyposwiss Advisors collects personal information that enables it to establish clients' identity and that of their representatives and authorized signatories, such as the name; address; email address; telephone numbers; date of birth; social insurance and social security numbers, tax identification or other identification numbers; nationality; marital status; occupation; financial goals; assets; income; origin and source of assets. Hyposwiss Advisors also collects information related to clients' transactions and communications flowing from clients' contractual relationships.

Who has access to Personal and Financial Information

Hyposwiss Advisors maintains a client database in which it stores the personal information about clients, their representatives and authorized signatories. Access to this database is restricted on a need to know basis to authorized employees of Hyposwiss Advisors that are responsible for client relationships, management of assets and compliance.

How Hyposwiss Advisors protects Personal Information

All employees of Hyposwiss Advisors who have access to personal and financial information of clients are required to maintain the confidentiality and to protect the security of that information. They must follow established procedures to ensure the security and confidentiality of client information, to protect against anticipated threats or hazards to the security of client information, and to protect against unauthorized access to client information.

For example, Hyposwiss Advisors maintains physical and electronic safeguards for confidential documents and paper files; Hyposwiss Advisors maintains an access control mechanism to its premises and computers.

Unauthorized access to or unauthorized disclosure of client information by an employee of Hyposwiss Advisors is strictly prohibited.

Sharing Information with Providers of Financial Instruments and External Service Providers

Providers of certain financial instruments, such as mutual or hedge fund managers and issuers of structured products, may require Hyposwiss Advisors to disclose identity and transaction information. Such information may include, but is not limited to, the name, address, domicile, number of securities held, amount and dates of transactions.

In carrying out its asset management services, from time to time, Hyposwiss Advisors may engage external service providers for certain legal, compliance, technical, IT or other services. Third-party service providers are carefully selected, instructed and monitored by Hyposwiss Advisors. Outsourced service providers are required to observe high standards of privacy protection and discretion. Client personal information transmitted to external service providers is limited to the specific information required for the provision of services.

When signing the Asset Management Services Agreement, clients acknowledge that by disclosing the required information Hyposwiss Advisors is not violating any secrecy laws of Switzerland and clients accept that such information may, subject to applicable laws and regulations, be disclosed to providers of financial instruments and to external service providers.

Reporting and Disclosure of Information to Regulatory Authorities and other third parties

Hyposwiss Advisors may disclose client personal information under the following special circumstances:

- to the Swiss Financial Market Supervisory Authority (FINMA), the United States Securities and Exchange Commission, the U.S. Internal Revenue Service (IRS), Canadian securities authorities, stock exchanges or certain other regulatory or supervisory authorities, as permitted or required under applicable laws or regulations for regulatory, stock exchange provisions or enforcement purposes (such as anti-money laundering investigations),
- as permitted or required under applicable laws or regulations, to comply with laws, regulations, subpoenas, court orders or criminal investigations,
- to respond to authorized information requests from domestic or international government, legal and regulatory authorities.

When signing the Asset Management Services Agreement, Client acknowledges that, by disclosing the required information, Hyposwiss Advisors is not violating any secrecy laws of Switzerland and Client accepts that such information may, subject to applicable laws and regulations, be disclosed to Swiss, U.S., Canadian or other foreign regulatory or supervisory authorities and in response to subpoenas, court orders and criminal investigations.

Accessing Clients' Personal Information

Hyposwiss Advisors will endeavor to keep its client files accurate and complete. Most of the information it collects is derived from the account opening documentation and forms that clients have provided to obtain asset management services from Hyposwiss Advisors. Hyposwiss Advisors will provide clients with reasonable access to this information.

Since Hyposwiss Advisors makes investment decisions based on the information clients have provided, clients are encouraged to review this information and notify Hyposwiss Advisors if this information needs to be corrected or updated.

Additionally, Hyposwiss Advisors will rely on the accuracy of clients representations made to it in connection with certain derivative, hedge funds and other investments where representations regarding clients net worth, residency and tax status are relevant to conform to applicable investor restrictions. In those circumstances, clients are required to notify Hyposwiss Advisors in writing if any representation becomes inaccurate or needs to be updated.

Clients should contact their Hyposwiss Advisors investment advisor if they have any questions or concerns with regard to their personal information.

Client specifically agrees to the aforementioned policies and consents that said Client's personal information may be collected by Hyposwiss Advisors and may be transmitted to applicable domestic and foreign legal and regulatory authorities or third-parties, as indicated above, in carrying out its obligations under the Asset Management Services Agreement and in compliance with applicable laws, regulations and court orders as stated above.