

NOTIFICATION TO COUNTERPARTIES REGARDING THE PROCESSING OF THEIR PERSONAL DATA

1. Introduction & General Terms

In this Privacy Notice 'EFG' refers (as applicable) to each and all entities of EFG Group, as defined below. A list of the EFG Group entities and their contact details can be found here: <https://www.efginternational.com/Contacts.html>.

EFG collects, stores and processes in general Personal Data (as defined below) in accordance with applicable data protection legislation including the General Data Protection Regulation (EE) 2016/679 (the "GDPR") when it is applicable (jointly "Data Protection Legislation").

This Notification by EFG to its counterparties describes the way in which EFG collects, uses and processes Personal Data relating to its counterparties (if they are natural persons) or the legal representatives, the directors, the beneficial owners or/ and the contact persons of these counterparties, in case the counterparties are legal entities ("You").

2. Types of Personal Data collected - Sources

For the purposes of this Notification, Personal Data means any information which relates to an identified or an identifiable person, or which may be used for the identification of a person ("Personal Data").

The types of Personal Data that EFG may process include, as the case may be, *inter alia*:

- Name, surname, father's name, mother's name, email address, signature, products or services provided, as the case may be;
- Where the counterparty is a natural person: VAT number and Tax Authority, number of ID document, date of issue and issuing authority;
- Where the counterparty is a legal entity: working position within the counterparty/ capacity.

Your Personal Data are in principle collected from you or from EFG's counterparty which transferred to EFG your data in the context of their agreement or for the purpose of concluding an agreement. Moreover, we may obtain your Personal Data from other sources such as publicly available sources, creditworthiness assessment companies, etc.

3. Personal Data of Third Parties

In case you provide EFG with Personal Data of third parties (e.g. legal representatives, employees), you must notify these persons about the processing of their Personal Data by EFG and their respective rights (for example by disclosing this Notification).

Moreover, if required by law, you must obtain the consent of these persons relating to the transfer of their data to EFG and the relevant processing of their data by the Company. If you provide Personal Data of third parties, EFG considers that the relevant consent of these third parties has been obtained, upon their having received the respective notification.

4. Why does EFG collect, use, disclose and store Personal Data?

EFG collects, uses, discloses and stores Personal Data for the following purposes: (1) choice of counterparty, (2) conclusion of an agreement with the counterparty (3) service of the agreement with the counterparty, including the management of the relevant payment fees under this agreement, (4) assessment of the cooperation with the counterparty, (5) to safeguard its rights under the applicable law, (6) to fulfil its obligations required by law, (7) to safeguard the compliance with the internal policies/ proceeding of the Company, (8) research (market investigation, satisfaction survey etc.) and (9) direct marketing purposes.

5. Legal Basis of the processing of your Personal Data

We will only use your Personal Data when the law allows us to. Most commonly and depending on the situation in which we will use your Personal Data, we will use your Personal Data in the following circumstances:

- Where we need to perform the contract we have entered into with you or in order to take steps at your request prior to entering into any such contract;
- Where we need to comply with a legal obligation; and
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (e.g. assuring high level standards across EFG Group, ensuring compliance with our policies and procedures);
- Where it is needed in the public interest;
- Where necessary for the establishment, exercise and defense of legal claims;
- Where we need to protect your interests (or someone else's interests); and
- In limited circumstances, where you have given your consent.

6. Recipients of your Personal Data

EFG may from time to time disclose your Personal Data to third parties for any of the aforementioned purposes. Examples of third parties to whom EFG may transfer your Personal Data include, *inter alia*:

- Third parties which provide us services (e.g. IT companies etc.)
- Entities which are within the same group of companies with the Company.
- Consultants or auditors.
- Any court or judicial authority of the relevant jurisdiction, mediator, arbitrator, taxation authority or regulatory or public authority.
- Public or national authorities, where required by law.
- Otherwise, if you have given your consent for that disclosure.

7. Overseas transfers of Personal Data

Due to the nature of our work, we may disclose your Personal Data to third parties established outside the European Economic Area (EEA). In these cases, except where the relevant country has been determined by the European Commission to provide an adequate level of protection (currently Andorra, Argentina, Canada (Commercial organizations), Switzerland, Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand and Uruguay as well as the United States (but limited to entities subject to the Privacy Shield), we require such recipients to comply with appropriate measures designed to protect the Personal Data.

8. Retention period of your Personal Data

We will retain your Personal Data for as long as we consider it necessary in order to fulfil the purpose for which they were collected or to comply with legal, regulatory, accounting, auditory requirements or requirements provided in our internal policies/ proceedings. In order to define the adequate retention period of your Personal Data we take into consideration the applicable legislation, as well as the quantity, the nature and the sensitivity of the Personal Data, the prospective risk of damage caused due to an unauthorized use or disclosure of your Personal Data, the purposes for which we collected your Personal Data and whether we can fulfil the purposes through other means.

9. Your rights and obligations

(a) Your obligation to notify us for any change

It is important that your Personal Data be updated and accurate. Please notify us in case there is a change to any Personal Data you have provided us with.

(β) Your rights in relation to your Personal Data

In certain circumstances, and subject to applicable law, you have the right by law to:

- Request access to your Personal Data.
- Request the correction of your Personal Data that we store about you.
- Request the deletion of your Personal Data if it is no longer necessary for the purpose for which it was collected
- Object to the processing of your Personal Data (e.g. you have the right to object in writing in case we process your Personal Data for direct marketing purposes by contacting us at the email address mentioned below).
- Request the restriction of the processing of your Personal Data.
- Receive your Personal Data in a structured format or request the transfer of your Personal Data to a third party (“data portability”).
- Withdraw, in case we process your Personal Data based on your consent, your consent at any time. Notably, the withdrawal of your consent will not affect the legality of the processing which was based on your consent prior to its withdrawal.
- Request, where applicable, not to be subject to decisions based on automated decision-making, including profiling.

If you want to exercise your rights in accordance with the above, or you have any query relating to this Notification, please contact your EFG counterparty and/ or the Data Protection Officer/ the Privacy Officer of the EFG entity that you are collaborating with.

Finally, you have the right to lodge a complaint with the supervisory authority in the jurisdiction where you live or work, or in the place where you think an issue in relation to your data has arisen.).

10. Changes to this Notification

We reserve the right to update this Notification at any time, and we will notify you of such updates accordingly.