



## PRIVACY NOTICE

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Dôme Capital Partners SA truly values and is committed to respect your privacy throughout our daily activities<sup>1</sup>.

The purpose of this Privacy Notice is to inform about how we collect, store and process your personal data. It is separate and in addition to any client confidentiality obligations we may owe you in relation to regulations other than personal data protections ones. Please refer to our terms and conditions, applicable to your engagement, for further details on confidentiality.

### 1. WHO CONTROLS YOUR PERSONAL DATA?

Dôme Capital Partners SA, boulevard du Théâtre 12, 1204 Geneva, Switzerland (hereafter "the Company" or "we" or "us"), registered to the Commercial Register of Geneva under CHE-225.138.956, is your personal data controller.

We process your personal data and any personal data of individuals or entities related to you (together the "Data Subjects" or "you"), which you or a third party may provide to us. Typically, you will provide us with personal data in connection with our prospective and/or existing business relationship ("Business Relationship"), e.g., your use of our services, website.

We may process your personal data as controller or as joint controller (the "Controller").

### 2. WHO TO CONTACT FOR QUESTIONS OR CLARIFICATIONS?

Feel free to write to your usual contact person with us and/or to Anastasia Areny [info@dome-capital.com](mailto:info@dome-capital.com).

### 3. WHAT PERSONAL DATA DO WE COLLECT?

Personal data ("Personal Data") includes any information, irrespective of the storage medium, relating to an identified or identifiable natural person, *i.e.*, Data Subject.

Typically, we may process the following personal data:

- Identification data, *e.g.*, first name, family name, date of birth, gender, address, email, telephone numbers, nationality, citizenship, residency, identity documents;
- Information on relevant family members and business relationships;

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<sup>1</sup> This includes compliances with the Swiss Data Protection Act (DPA) and the EU General Data Protection Regulation (GDPR), where applicable.

- Education, *e.g.*, professional qualifications, employment and professional information, references;
- Human resources information, *e.g.*, salary, pension, health data
- Financial information, *e.g.*, tax data, banking;
- Website information, *e.g.*, cookies, website-related technology information.

#### **4. WHAT ARE OUR SOURCES OF COLLECTION?**

We collect Personal Data at different times, and from different sources:

- directly from the data subjects, *e.g.*, if and when you or your organisation contact us in relation to any Business Relationship;
- indirectly from other external sources, *e.g.*, public information, information provided by other third parties, our website

#### **5. WHY (OUR PURPOSES) AND ON WHAT BASES DO WE PROCESS YOUR PERSONAL DATA?**

We process your Personal Data in connection to our Business Relationships with Data Subjects (*i.e.*, you and any personal data of individuals related to you). Kindly note that we may be under an obligation to collect and process certain elements of your Personal Data to comply with legal and regulatory requirements. Failing to provide such information will likely limit in all or in part our ability to maintain a Business Relationship with you.

For clarity's sake, we do not process your Personal Data for any purpose unconnected to our Business Relationship, all the more to sell your Personal Data.

As illustrations, we process your Personal Data to:

- Contact and identify Data Subjects;
- Perform our contractual duties arising under our Business Relationship, *e.g.*, to provide our services, to manage your relationship with custodian bank, to process payments and billing, to process and response to Data Subjects queries including to provide third parties or authorities with relevant information;
- Comply with any mandatory legal obligations to which we are subject, *e.g.*, to keep tax and corporate records<sup>2</sup>, to cooperate with or report to competent administrations, law enforcement authorities, regulatory bodies and/or public authorities.
- Monitor, develop and improve our services and processes;
- Establish, exercise or defend our legal rights;
- Send newsletters and marketing material;
- Monitor the use of the Website.

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<sup>2</sup> *E.g.*, as per Swiss code of obligations, the Swiss Anti-Money Laundering Act, the Swiss VAT Act, and Swiss tax law

Accordingly, our main bases (alone or combined) to process your Personal Data is the performance of a contract, compliance with our legal obligations and for our legitimate interest. We are available to provide more detailed information as regards what base we rely on for certain purposes.

We may also rely on your consent to process your Personal Data, in which case we will inform you and seek your informed consent prior to any processing activity.

#### **6. DO WE SHARE YOUR PERSONAL DATA OUTSIDE OF DÔME CAPITAL PARTNERS?**

Yes, we may share your Personal Data with third parties other than us ("**Third Party.ies**") if necessary and related to our Business Relationship and the Purposes set out under §5 above. We do so in full transparency with you and undertake to disclose any disclosure or transfer to a Third Party, *e.g.*, in our contractual documentation.

You can contact us at any time to obtain the latest list of Third Parties with which we collaborate to provide our Services and to which we share part or all of your Personal Data.

#### **7. DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE OF SWITZERLAND?**

Yes, we may disclose, transfer and/or store Personal Data outside of Switzerland ("**International Transfer**"); and we intend to do so with full transparency.

First, we will only transfer your Personal Data in connection with our Business Relationship and our Purposes for processing your Personal Data (see §5 above). Typically, we transfer Personal Data to service providers and custodian banks, as part of our efforts to strive for efficient and lean services that will ultimately benefit you.

Second, you can contact us at any time to obtain the latest list of the jurisdictions to which we transfer Personal Data. We also include in this list the appropriate safeguards set to protect your Personal Data. Where relevant, we may also seek your consent to an International Transfer.

#### **8. WHAT ARE YOUR RIGHTS AND HOW CAN YOU ENFORCE THEM?**

We value and respect your rights and will do our very best to address and reply efficiently to you exercising them.

You may reach out to us (see our contact details under §2 above) to exercise your rights arising under applicable regulations, in particular your right to information / access, right to request rectification or erasure of inaccurate Personal Data, request erasure of Personal Data, request a restriction of processing, object to the processing, receive your Personal Data in a conventional electronic format (data portability).

You also have the right to withdraw your consent (previously given) to a specific processing activity. Your withdrawal will then apply prospectively, for future processing activities (no retroactive effect).

Please keep in mind that enforcement of your rights above may be subject to certain conditions and/or exceptions that may restrict their enforcement and/or limit our ability to assist and positively reply to you. We will endeavour to clarify and inform you accordingly.

Even if a Subject contests the processing of its data, we are entitled to continue such processing if it is (i) legally binding, (ii) necessary for the performance of the mandate to which the Data Subject is party,

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#### **Dôme Capital Partners SA**

(iii) necessary for the performance of a public interest mission or (iv) necessary for the legitimate interests that the Company pursues, including the finding, exercise or defense of a right in justice.

**9. HOW DO WE STORE AND SECURELY PROCESS YOUR PERSONAL DATA?**

We electronically store your Personal Data on servers located in Switzerland, including backups. As regards any paper files, we exclusively store them in Switzerland.

We take all reasonable and necessary measures to securely process your Personal Data. Accordingly, we implement appropriate administrative, technical and physical measures which are reasonably necessary to protect the confidentiality, the integrity, the availability and the traceability of your Personal Data. You can contact us at any time to obtain more detailed information as regards our current IT / Information Security measures.

For transparency's sake, where International Transfers (please see §7 above) take place, your relevant Personal Data will be stored on the recipient's servers, possibly outside of Switzerland. See §7 above for further development in this respect.

**10. HOW LONG DO WE KEEP YOUR PERSONAL DATA (RETENTION)?**

We retain your Personal Data for as long as we need to carry out the purposes listed under §5 above. For clarity's sake, these purposes include legal or regulatory requirements to keep Personal Data beyond the expiry of our Business Relationship.

If and when the Personal Data is no longer required to achieve the purposes, we will delete or anonymise the same.

**11. ARE THERE ANY SANCTIONS IF DÔME CAPITAL PARTNERS DO NOT RESPECT ITS OBLIGATIONS?**

In the event that an employee of the Company fails to fulfill its obligations under this Privacy Notice, we apply the usual penalties provided for breaches of compliance obligations, such as more precisely stipulated in the employment contract concluded with each employee.

**12. WHEN DOES THIS PRIVACY NOTICE COME INTO EFFECT?**

This Privacy Notice entered into force with effect from 1 September 2023.