

## Client information on data protection

Mandate number:

Account/Deposit number:

With this client information, Tareno AG (hereinafter: the Company) provides all essential information on your personal data that is collected and otherwise processed within the scope of your asset management or investment advisory mandate.

### Contact details

Tareno AG  
Gartenstrasse 56  
4052 Basel  
[info@tareno.ch](mailto:info@tareno.ch)  
[www.tareno.ch](http://www.tareno.ch)

This document is aligned with the EU General Data Protection Regulation ("GDPR") and the Swiss Data Protection Act ("DPA") and aims to fulfil the Company's information duties. However, the application of these laws depends on each individual case.

### A. Collection and Processing of Personal Data

Personal data includes any information relating to an identified or identifiable natural person. As part of its mandate, the Company collects several types of personal data.

These include in particular:

- Personal details (e.g. name, address, date of birth, civil status)
- KYC information (e.g. source of wealth /funds, profession, transaction details)
- Bank account information (e.g. IBAN)

This also includes any other information that you provide to us or is inevitably collected in the course of providing the agreed service.



Insofar as it is permitted to us, we may also receive your personal data from affiliated companies, from authorities or other third parties (such as custodian banks, distribution partners). In addition to the data you have provided directly to us, the categories of data we receive about you from third parties include the following:

- Information from public registers;
- Data we have received in connection with administrative or court proceedings;
- Information about you in correspondence and discussions with third parties;
- Information about you given to us by individuals associated with you (family, consultants, legal representatives, etc.) in order to conclude or process contracts with you or with your involvement (e.g. powers of attorney);
- Information on legal requirements such as anti-money laundering regulations;
- Information about you found in the media or on the internet.

In principle, we retain this data for 12 months after the purpose of processing has been fulfilled. This period may be extended if this is necessary for evidentiary purposes or to comply with legal or contractual requirements.

## **B. Purpose of Data Processing and Legal Bases**

The company primarily uses collected data in order to perform the agreed-upon services vis-à-vis our clients as well as to comply with domestic and foreign legal obligations.

In addition, in line with applicable law and where appropriate, we may process personal data for the following purposes which are in our (or, where applicable, any third parties') legitimate interest, such as:

- Advertising and marketing (including organizing events), provided you have not objected to the use of your data for this purpose;
- Asserting legal claims and defense in legal disputes and official proceedings;
- Prevention and investigation of criminal offences and other misconduct;
- Ensuring the operation of our IT systems, our websites, apps and other devices.

## **C. Data Subject Rights**

In accordance with the applicable law, individuals whose personal data is processed ("data subjects") are guaranteed a number of rights in relation to the processing of their data. It is important to the Company that you can exercise your rights easily and transparently, should you wish to do so.

In particular, you have the following rights:

- The right to request and receive information as to whether and which of your data we are processing;
- The right to have inaccurate or incorrect data be corrected;
- The right to object to all or specific instances of processing;
- The right to request the deletion of data;
- The right to request that we provide you with certain personal data in a commonly used electronic format or transfer it to another data controller (data portability);
- The right to withdraw consent if our processing is based on your consent;
- The right to obtain further information on the exercise of these rights upon request.

In order to assert these rights, please contact us in writing using the contact details provided above. It is important to note that we reserve the right to enforce statutory restrictions or exceptions in certain cases. For example, if we are obligated to retain or process specific data, have an overriding interest (insofar as we may invoke such interests) or need the data for asserting claims.

Please further note that the exercise of these rights may conflict with your contractual obligations, and this may result in consequences such as premature contract termination and may involve costs. If this is the case, we will inform you in advance unless this has already been contractually agreed upon.

In addition, every data has the right to enforce his or her rights in court or lodge a complaint with the competent data protection authority. The competent data protection authority in Switzerland is the Federal Data Protection and Information Commissioner (<https://www.edoeb.admin.ch/>).

#### **D. Sharing Data with Third Parties and Transfer of Data Abroad**

In connection with our mandate, our services and products, our legal obligations and in accordance with the previously stated purposes of data processing, we may transfer data to third parties. Such transfers will occur when permitted and considered appropriate, either for the purpose of data processing on behalf of the Company ("data processors") or, as the case may be, their own purposes ("data controllers"). In particular, the following categories of recipients may be concerned:

- Custodian Banks
- Provider of Portfolio Management and Customer Relationship Management Systems (PMS / CRM)
- Provider of Document Management Systems (DMS)



- Domestic and foreign authorities, official bodies and courts
- External provider of legal or tax services, compliance and risk management services (LCR)
- Data Hosting Provider

The recipients are generally located in Switzerland, but may also be located abroad in exceptional cases, primarily in the EU area.

#### **E. Changes to this Privacy Policy**

We may amend this Privacy Policy at any time without prior notice. The current version published on our website shall apply. If the Privacy Policy is part of an agreement with you, we will notify you by e-mail or other appropriate means in case of an amendment.