TRADE X BANK

**CLIENT PRIVACY NOTICE**

**DATA PROTECTION IN ACCORDANCE WITH SWISS DATA PROTECTION LAW**

In the course of conducting its business activities, TradeXBank AG (“**TXB**”) handles information relating to both individuals and legal entities (“**Personal Data**”), including data concerning prospective, existing, and former clients (“**you**”).

TXB is committed to safeguarding your privacy. This Privacy Notice (“**Notice**”) provides information on which Personal Data is collected by TXB, how such information is used, and the rights available to you in connection with that data.

This document provides clear and transparent information regarding:

- the reasons TXB collects, stores, and processes your Personal Data, as well as the methods used;
- the legal grounds that permit the processing of your Personal Data; and
- your rights concerning such processing, including the ways in which those rights may be exercised.

This Notice does not alter or replace any agreements governing your relationship with TXB, including the General Terms and Conditions.

## 1 Scope of this Notice

This Notice applies to all forms of handling and use (“processing”) of Personal Data carried out by TXB where you are a prospective, existing, or former client.

## 2 Categories of Personal Data We Collect

For existing and prospective clients with whom no direct relationship or contact has yet been established, TXB may collect the following categories of personal data, among others:

- personal details used for identification purposes, including name, nationality, gender, and address, together with contact details such as telephone number and email address, as well as family-related information including marital status;
- information connected to professional activities and background, including professional positions, directorships, business affiliations or networks, along with details concerning company ownership and financial background;

- information obtained from public registers, such as commercial registry data, as well as online identification information, including social or professional networking details and communications data.

For existing and former clients, as well as prospective clients with whom TXB is in the process of establishing a business relationship, TXB may collect the following categories of Personal Data, where allowed under applicable law:

- identification and contact information, including your full name, date of birth, identification number, copies of compliance documentation (such as a passport or national identity card), residential address, domicile, telephone number, electronic contact details, and family-related information, including details relating to a spouse, partner, or children;
- financial and economic information, including records of transactions and payments, details concerning your assets and property holdings, liabilities, tax-related information, income, revenues, financial statements, investments, and your investment preferences or objectives;
- documents and information relating to your tax residence or other taxation matters;
- where applicable, professional and employment-related information, such as your position, occupation, qualifications, and prior work experience;
- information concerning your understanding of, and experience with, investment products and financial markets;
- records and details of communications and interactions between you and TXB, together with information about the products and services you use, including interactions through electronic channels such as mobile applications and e-mail correspondence;
- records associated with telephone communications with TXB, including call log details such as originating and receiving numbers, forwarded numbers, date and time of calls or messages, call duration, routing information, and the category or type of communication;
- voice recordings and other communication-related data;
- where relevant, information connected with any mandate or authorization you nominate;
- reference numbers and identifiers allocated to you by TXB, including client numbers, account numbers, contract references, business relationship identifiers, partner identifiers, and accounting-related references;

- when accessing TXB websites, platforms, mobile applications, products, or services, information relating to your activity and usage, together with technical information automatically transmitted by your browser or device and logged by our servers. This may include access dates and times, files accessed, data transmission volume, access performance details, device information, browser type and language, requesting domain, and IP address. Additional information may also be collected where voluntarily provided by you, such as during registrations or requests; and
- in certain circumstances permitted by law, Sensitive Personal Data, including biometric data, political affiliations or opinions, health-related information, racial or ethnic origin, religious or philosophical beliefs, and, where legally permissible, information concerning criminal convictions or offences.

TXB may also use cookies, tracking mechanisms, and comparable technologies — including but not limited to web beacons, pixels, tags, GIFs, SDKs and unique identifiers — to gather and process information across the various devices and communication channels you use when interacting with TXB, including e-mail, websites, platforms, mobile applications, products, and services.

Further details regarding the use of cookies and similar technologies on TXB's website can be found in the TXB Website TERMS OF USE.

The Personal Data described above may additionally be used for analytical, statistical, and measurement purposes, including machine learning and profiling activities based on the processing of your data, for example through information collected using cookies and tracking technologies.

In some instances, this information may also be obtained from external sources, including public registries (which may include beneficial ownership registers depending on the product, service, or jurisdiction involved), governmental authorities, public databases, wealth screening providers, credit reference agencies, fraud prevention organizations and intermediaries supporting data portability.

Where this is relevant to the products or services provided to you, TXB may also gather information relating to additional authorized signatories or account holders connected to you, as well as your business associates, including shareholders and beneficial owners, controlling persons, family members or dependents, agents, and representatives. In the case of institutional or corporate clients, financial institutions and investors, TXB may further collect information relating to directors, employees, shareholders, representatives, and beneficial owners. Prior to sharing such information with TXB, you should ensure that the relevant individuals are informed and provided with a copy of this Notice.

## 3 Purposes for Processing Personal Data and Applicable Legal Basis

### 3.1 Processing Purposes

TXB processes Personal Data only for defined and legitimate purposes and limits the processing to information necessary to fulfil those purposes. Subject to applicable law Personal Data may be processed for the following purposes, which are listed by way of example and are not exhaustive:

#### a) Establishing the Client Relationship

- to confirm your identity and review your application, including assessing whether guarantees or other security arrangements may be required where you apply for credit facilities;
- to carry out regulatory and legal verification procedures, including anti-money laundering reviews, fraud prevention activities, and other compliance-related checks, as further described in Section e) below.

#### b) Administration of the Client Relationship

- to maintain and manage our ongoing relationship with you, including communicating regarding products and services provided by TXB, responding to customer service requests and complaints, supporting debt collection activities, making decisions concerning your identity or creditworthiness, locating or tracing you where necessary, and, in accordance with applicable law, closing accounts that remain inactive where contact with you cannot be established over a prolonged period;
- to better understand you as a client, including your preferences and interests regarding existing or potential products and services offered by TXB. This may involve profiling activities based on the processing of your Personal Data, including analysis of the applications, products, platforms, and services you use, information gathered through tracking technologies, and your preferred communication methods;
- to gather and analyse information relating to your individual, group-based, personalised, or anonymised activities and potential interests associated with TXB products and services, websites, mobile applications, platforms, multimedia portals, and social media channels.

#### c) Delivery and Execution of Products and Services

- to provide and administer products and services effectively, including ensuring accurate identification of clients and processing payments to and from your accounts in accordance with your instructions and the applicable product terms;

TRADE X BANK

- to deliver and maintain IT-related solutions and services in line with contractual obligations and your instructions, including activities such as testing, incident management, audit support, investigations, compliance assistance, and support relating to Personal Data storage and regulatory obligations;
- to conduct underwriting activities where relevant.

### d) Business Development, Marketing, and Brand Protection

- to assess whether TXB may offer you products, services, or events that are likely to be relevant or of interest to you.
- to communicate with you for direct marketing purposes regarding products, services, events, competitions, or promotional activities that TXB believe may be relevant or of interest to you;
- to build and use audience groups across digital and online platforms in order to present targeted advertising and marketing communications.

### e) Regulatory Compliance, Risk Oversight, and Prevention or Investigation of Crime

- to conduct legal and regulatory verification procedures, particularly during onboarding and recurring compliance reviews, including checks related to anti-money laundering requirements, fraud detection and prevention, sanctions screening, and financial crime monitoring. Such activities may involve profiling based on the processing of your Personal Data, for example by assessing the manner and geographic location from which TXB applications, products, or services are accessed or used;
- to satisfy continuing legal, regulatory, and compliance obligations, including obligations arising under financial services regulations, anti-money laundering laws, and tax legislation. This may include monitoring and recording communications, assigning risk classifications to business relationships, making disclosures to tax authorities, financial regulators, governmental bodies, or judicial authorities, and supporting the prevention, detection, or investigation of criminal activities. These activities may also involve profiling based on your use of TXB applications, products, or services and the locations from which they are accessed;
- to receive, assess, and manage complaints, requests, notifications, or reports submitted either by you or by third parties;
- to respond to existing or anticipated legal proceedings, regulatory inquiries, or requests issued by judicial, governmental, or public authorities.

TRADE X BANK

### f) Supporting, Maintaining, and Improving TXB Technology

- to enhance and develop TXB products, services, systems, and technological infrastructure, including through system testing, upgrades, process improvements, and market research intended to improve existing offerings or identify additional products and services that may be provided;
- to review and assess the effectiveness, relevance, and performance of marketing activities and campaigns carried out by TXB.

### g) Additional Processing Purposes

- to support the prudent and efficient operational management of TXB, including activities relating to credit management, risk and compliance oversight, reporting, insurance, technological support, audits, training concerning systems and products, and general administrative functions;
- to facilitate or support an actual or potential transfer, merger, acquisition, disposal, or restructuring involving all or part of TXB's business, assets, rights, or interests, including disclosures to potential buyers, transferees, merger partners, sellers, or their advisers;
- to collect and process information necessary to maintain the security of TXB premises, safeguard staff, visitors, property, and information, and prevent or investigate unauthorised access to secure areas. This may include maintaining building access records and CCTV footage for the prevention, detection, or investigation of theft, misuse of assets, or threats to personnel safety;
- to perform statistical, transactional, and analytical reviews, together with related research activities; and
- to exercise and enforce TXB's legal rights and obligations in relation to you or third parties.

TXB processes Personal Data using both human review and automated technologies, including artificial intelligence systems. These automated processes are generally combined with and supported by manual oversight. For example, artificial intelligence tools used by TXB may analyse data to detect trends, relationships, or patterns, with the resulting information typically reviewed and interpreted by individuals.

### 3.2 Legal Grounds for Processing Personal Data

TXB processes your Personal Data in accordance with the applicable legal and regulatory framework. Depending on the relevant processing purpose described in Section 3.1, and where legally required, the processing of your Personal Data may rely on one or more of the following legal bases:

TRADE X BANK

- processing that is necessary in order to enter into, administer, or perform a contract with you relating to the products or services requested by you, including the fulfilment of contractual obligations. This includes, for example, certain processing activities described in Sections 3.1 a) and c), as well as some disclosures of information referred to in Section 5;
- processing required to comply with legal or regulatory obligations applicable to TXB, including compliance reviews and regulatory checks. This includes activities referred to in Sections 3.1 e) and g), as well as disclosures made to governmental authorities, regulators, or supervisory bodies as described in Section 5;
- processing that is necessary for the legitimate interests pursued by TXB, provided that such interests do not override your fundamental rights, freedoms, or interests, and only to the extent the Personal Data is required for the intended purpose. This may include processing carried out for certain purposes identified in Sections 3.1 a), b), d), e), f), and g). Examples of TXB legitimate interests are set out below;
- processing carried out on the basis of your consent where consent is required by law, including, where applicable, your explicit consent for the processing of Sensitive Personal Data, such as biometric information; or
- in certain situations, processing that is necessary for the performance of a task carried out in the public interest.

TXB may rely on legitimate interests in particular where processing is necessary for the following reasons:

- to manage and maintain our relationship with you and better understand your interests, preferences, and the products or services you currently use or may wish to receive in the future, as referenced in Section 3.1 b);
- to determine whether TXB may offer you products, services, events, or opportunities that could be relevant or beneficial to you, as outlined in Section 3.1 d);
- to help prevent fraud, criminal conduct, misuse of TXB products or services, and to maintain the security of TXB premises, systems, infrastructure, networks, and information, as described in Sections 3.1 e) and g);
- to receive, investigate, and manage complaints, reports, or requests submitted by you or third parties to designated departments within TXB as referred to in Section 3.1 e);

- to improve TXB products, services, systems, technologies, and market understanding through development activities and research, as outlined in Section 3.1 f);
- to cooperate with or respond to requests, investigations, proceedings, or inquiries involving judicial, regulatory, or public authorities, as described in Section 3.1 e);
- to exercise TXB's rights under Articles 26 and 27 of the Federal Constitution of the Swiss Confederation, including rights relating to property and the freedom to conduct business activities; and
- to fulfil responsibilities connected with prudent operational management and compliance with regulatory obligations applicable to TXB worldwide, as referenced in Section 3.1 g).
- in certain circumstances where disclosures described in Section 5 are made, in order to support the delivery of products and services, maintain a consistently high standard of service and ensure the satisfaction of clients, employees, and other stakeholders.

Where TXB processes Sensitive Personal Data relating to you, such processing may occur because:

- it is necessary for the establishment, exercise, or defence of legal claims;
- the relevant Personal Data has clearly been made public by you; or
- you have provided your explicit consent for the processing of that information, where such consent is legally permitted and required.

## 4 How Personal Data Is Protected

All TXB personnel with access to Personal Data are required to follow internal policies, procedures, and confidentiality obligations relating to the handling and processing of such information. These measures are intended to ensure the security and confidentiality of your Personal Data.

In addition, TXB maintains appropriate technical and organisational safeguards designed to protect Personal Data against accidental, unlawful, or unauthorised destruction, alteration, disclosure, misuse, loss, or access, as well as against any other unlawful form of processing.

TRADE X BANK

# 5 Access to Personal Data and Information Sharing

## 5.1 Sharing Outside TXB

### 5.1.1 Third-Party Recipients

TXB may disclose or transfer Personal Data to other financial institutions, credit institutions, comparable organisations, and professional advisers or consultants where necessary to establish, maintain, or perform the business relationship with you.

In connection with the provision of products and services, TXB may also share Personal Data with persons acting on your behalf or otherwise participating in the relevant transaction or arrangement, depending on the nature of the product or service involved. Such recipients may include, without limitation:

- parties that acquire an interest in, participate in, or assume risk relating to a transaction, including insurers;
- credit card associations, card issuers, payment platform providers, and similar payment service organisations;
- issuers of securities in which you hold an interest, including third parties appointed by such issuers, where those securities are held for you through third-party banking institutions;
- payment recipients, beneficiaries, account nominees, intermediaries, correspondent banks, agent banks, and custodian banks; and
- clearing houses, settlement or clearing systems, and specialised payment institutions or providers, including organisations such as SWIFT.
- market counterparties, stock exchanges, upstream withholding agents, and swap or trade repositories;
- banks, financial institutions, credit bureaus, and credit reference agencies for the purpose of obtaining or providing credit-related information;
- external fund managers engaged in providing asset management services on your behalf;
- introducing brokers or intermediaries to whom TXB may provide referrals or introductions; and
- external legal advisers, auditors, accountants, consultants, and insurers engaged in providing professional legal, audit, accounting, consultancy, or insurance services to TXB.

#### 5.1.2 Service Providers

TXB may also disclose Personal Data to third-party suppliers and service providers who are contractually required to maintain confidentiality. These providers may include, among others, IT hardware and software vendors, outsourcing providers, logistics and storage companies, printing, mail and courier service providers, marketing and communications agencies, market data suppliers, transportation and travel management providers, and facility management companies.

Where Personal Data is processed by service providers on behalf of TXB, TXB takes appropriate measures to ensure that such providers comply with applicable data protection and security standards so that your Personal Data remains protected. Service providers are required to implement and maintain specified technical and organisational security measures regardless of their geographic location. These measures may include obligations relating to:

- information security governance and management;
- information security risk assessment procedures;
- technical and operational safeguards, such as physical security controls, logical access restrictions, malware and cyberattack protection, encryption measures, and backup and recovery processes; and
- providers of Cloud computing, data analytics, and artificial intelligence tools.

#### 5.1.3 Regulatory Authorities and Public Bodies

TXB may disclose Personal Data to supervisory authorities, regulators, governmental agencies, courts, or parties involved in legal proceedings where disclosure is required by law, regulation, applicable codes of conduct, official requests, or where necessary to protect TXB's legitimate interests.

#### 5.1.4 Other Recipients

- Personal Data may be disclosed where necessary to establish, exercise, or defend legal rights, including the rights of TXB, its employees, clients, or other stakeholders, or in response to requests from individuals or their representatives seeking to protect such rights;
- information may also be shared with prospective buyers, transferees, merger partners, sellers, or their advisers in connection with an actual or contemplated transfer, disposal, merger, restructuring, or acquisition involving all or part of TXB's business, assets, rights, or interests; and
- disclosures may also occur to any other lawful recipient where required or permitted under applicable legal or regulatory requirements.

## 5.2 International Transfers of Personal Data

Subject to any contractual arrangements governing your relationship with TXB, including the General Conditions, Personal Data shared within TXB or with third parties as described in Section 5.1 may, in certain cases, be processed in jurisdictions outside your country of residence.

TXB transfers Personal Data internationally only to jurisdictions recognised as providing an adequate level of data protection or, where such adequacy protections are not available, subject to appropriate safeguards in accordance with applicable law. Such safeguards may include standard contractual clauses recognised by the Swiss Federal Data Protection and Information Commissioner (FDPIC) and, where applicable, by the European Commission or reliance on another lawful transfer mechanism or statutory exemption.

## 6 Retention of Personal Data

TXB retains Personal Data only for as long as necessary to fulfil the purpose for which the information was originally collected, or as required to satisfy legal, regulatory, or internal policy obligations. To determine the appropriate retention periods, TXB applies specific criteria based on the purpose and nature of the data being processed. As a general principle, and subject to limited exceptions, records are retained in accordance with the TXB Record Keeping Procedure.

Where necessary, TXB will continue to retain your Personal Data throughout the duration of the banking relationship and in accordance with applicable legal and regulatory requirements. Certain information may also continue to be processed following the end of the banking relationship for purposes such as compliance, documentation, recordkeeping, or risk management, or where retention is otherwise justified by TXB's legitimate interests or required by applicable law.

In addition, TXB is subject to obligations imposed by the Swiss Financial Market Supervisory Authority ("FINMA"), including requirements relating to the recording of internal and external telephone calls. TXB is also required to retain electronic communications, including but not limited to emails and chats, for a period of two years. Upon request, this information must be made available to FINMA.

As a general rule, TXB retains Personal Data for the duration of the relationship plus an additional period of typically ten years, reflecting the timeframe during which legal claims may potentially arise after termination of the relationship or contract.

If you wish to request the deletion of your Personal Data from TXB systems or databases, you may do so in accordance with the procedures described in Section 7 below, subject to the applicable review process.

## 7 Your Rights and How They May Be Exercised

### 7.1 Your Rights

You have the right to request access to the Personal Data TXB processes about you and to obtain information regarding such processing activities. If you believe that any Personal Data held by TXB is inaccurate, incomplete, or outdated, you may request that it be corrected or updated.

You may also have the right to:

- object to the processing of your Personal Data;
- request the deletion or erasure of your Personal Data;
- request restrictions on how your Personal Data is processed; and/or
- withdraw any consent previously provided to TXB for the processing of Personal Data, noting that such withdrawal will not affect the lawfulness of any processing carried out prior to the withdrawal.

Where Personal Data is processed for direct marketing activities, your right to object also applies to profiling activities connected with such marketing. You may opt out of direct marketing communications by contacting TXB using the details provided in Section 7.2.

Where the processing of your Personal Data is based on your consent, or where processing is necessary for entering into or performing a contract with you, you may also have the right to request that your Personal Data be transferred to you or another party in a portable format (commonly referred to as the "right to data portability"). In addition, you may request information regarding some or all of the Personal Data collected and processed by TXB concerning you.

TXB will comply with requests to access, rectify, erase, restrict, object to, or withdraw consent in accordance with applicable data protection legislation. However, these rights are not absolute and may be subject to legal limitations or exemptions. In most cases, TXB will need to verify your identity and may request additional information in order to properly understand and process your request. Where TXB is unable to act on a request, an explanation will be provided.

In certain situations, TXB may use automated decision-making processes in relation to your Personal Data. Where such processing occurs, you will be informed accordingly and provided with relevant information regarding the logic, criteria, and procedures involved. You may also request an explanation of any automated decision-making and, where applicable, request that a decision based solely on such processing be reviewed by a human.

### 7.2 Exercising Your Rights

To exercise any of the rights described above, you may contact TXB using one of the following channels:

- send a signed written request to TradeXBank AG, Data Protection Officer, Gartenstrasse 24, 8002 Zürich, Switzerland, including a copy of your passport or identity card for verification purposes in order to avoid delays;
- submit a request by email to DPO@tradexbank.ch.

### 7.3 Recording of Communications

Telephone calls and other forms of electronic communication (such as video calls or chat messaging) may be recorded. Such recordings may be used for client relationship management purposes as well as for training, quality assurance, and educational purposes.

If you do not wish your calls to be recorded for client relationship management purposes, you may inform your TXB representative.

## 8 Updates to Your Personal Data

TXB aims to ensure that your Personal Data remains accurate and current. You are therefore requested to inform TXB without undue delay if any of your Personal Data changes.

## 9 Amendments to This Notice

This Notice was last updated in August 2026. TXB may revise or update this Notice from time to time. Any changes will be made available through TXB communication channels and/or the TXB website. You are encouraged to review the Notice periodically, as it contains important information relevant to the processing of your Personal Data.

If you have any questions or comments about this Notice, please contact the Data Protection Office at DPO@tradexbank.ch