

DATA PROTECTION GUIDELINES

of IDE Trade SA

(Status as of 28 February 2022)

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A. GENERAL

IDE TRADE SA is obliged to comply with the Swiss Federal Act on Data Protection (FADP)¹ and, in conjunction with this, with the principles of the EU General Data Protection Regulation (EU-GDPR). In particular in the business partner verification process the strict implementation of the EU-GDPR is of decisive importance due to the processing of a large amount of personal data.

In order to meet the requirements of Articles 13 and 14 of the EU-GDPR, the data protection information contained in Section B is included as an integral part of the business partner verification process.

For business partner checks that are based on paper verification documentation, the following letter on data protection information must be handed over to the business partner by the R/A.

B. DATA PROTECTION INFORMATION

1. Information for the business partner about the Ide Trade business partner check

The performance of a business partner check in strict Compliance with the Swiss Federal Act on Data Protection (FADP) and the General Data Protection Regulation is an integral part of the Ide Trade's Compliance management system and contributes to compliance with statutory and regulatory requirements.

Obtaining certain information such as master data, ownership structures and management bodies, as well as integrity and absence of conflict, is an integral part of every business partner check and essential for its success. Only in this way can Ide Trade obtain and evaluate certain key information on a business partner in order to assess various quality and safety criteria.

If you become a business partner of Ide Trade SA, you will be subject to this business partner review both initially and on a recurring basis during the course of the business relationship.

In the following we, IDE TRADE SA, Corso Elvezia, 16 6900 Lugano (Switzerland) hereby inform you pursuant to Art. 13 and 14 GDPR about the processing of personal data of our business partners (e.g. suppliers / service providers, cooperation partners or sales partners).

2. Controller and Data Protection Officer

The contact details of the company data protection officer are as follows:

| Contact details of the data protection officer |
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| Please refer to the corresponding data protection officer responsible for the Controller for data processing that has initiated the business partner verification process on your company / you under: Mr. Enrico Maria Staderini Ide Trade SA Corso Elvezia, 16 6900 Lugano Switzerland Telephone: 41 (0)91 921 02 25 Mail: dp@idetrade.ch |

¹ RS 235.1 Federal Act on Data Protection (FADP) of 19 June 1992 (Status as of 1 March 2019)

3. Information on data categories

As part of our business partner check, we process the following categories of personal data in particular:

- Personal and contact information (e.g. surname, first name, address, position)
- Bank details information
- Company and industry information (e.g. industry, financial ratios, management, credit ratings)
- Entries on sanctions and terrorism lists
- Reporting about companies and persons

4. Purpose and legal bases of processing personal data

Data processing for the purpose of contract initiation and execution (Art. 6, Par. 1, Clause 1, Letter B, GDPR)

Data is processed insofar as it is necessary for the initiation and execution of contracts for goods and services. The purposes pursued in detail with the data processing result from the contractually stipulated purposes for the implementation of our business relations.

Data processing from legitimate interest (Art. 6, Par. 1, Clause 1, Letter f, GDPR)

We process your data in a permissible manner to protect the legitimate interests of us and third parties. This includes in particular the use of your personal data for the following applications:

- Consultation of and data exchange with credit agencies to identify addresses, activities, company structure, holders of management positions, ownership, creditworthiness and default risks.
- The legitimate interests of third parties exist in particular with regard to data processing by Ide Trade.

Data processing based on legal requirements (Art. 6 Par. 1c) GDPR) or in the public interest (Art. 6, Par. 1, Clause 1, Letter e, GDPR)

As a company, we are subject to various legal obligations (e.g. tax codes / Tax Code, Commercial Code), which make it necessary to process your data to comply with the law. This concerns, for example, the annual financial statements.

Categories of recipients of personal data / Transfer to an EU/EEA third country

We pass on your personal data within our company exclusively to those areas which need this data to fulfil their contractual and legal obligations or to implement our legitimate interest. This also applies to service providers and vicarious agents employed by us. Personal data will only be transmitted by us to third parties and other recipients if this is necessary for the aforementioned purposes or if this is legally obligatory.

The recipients of data include:

- IT service providers
- Credit agencies and other service providers for the identification of addresses, activities, corporate structure, holders of management positions, ownership relationships and creditworthiness or default risks
- In the event of a statutory or official obligation: Public bodies and institutions (e.g. public prosecutor's office, police, supervisory authorities, tax office)

A transfer of personal data to a country outside the EU or the EEA will only take place if either an adequacy decision of the EU Commission exists for the respective country or if there are other appropriate data protection safeguards within the meaning of Art. 44 et seq. of the EU Data Protection Act exist. GDPR (e.g. EU standard contractual clauses). Such a transmission is also permissible if an exception is fulfilled, in particular if you have consented to the transmission to such a country in accordance with the legal requirements (see in particular Art. 49 GDPR).

5. Duration of storage or deletion of personal data

We process your personal data for the above-mentioned purposes. Your data will be processed for the first time from the time of collection if you or a third party informs us of this. We will delete your personal data when the contractual relationship with you has ended, all mutual claims have been met and there are no other statutory storage obligations or legal justifications for the storage. These include, among other things, storage obligations from the German Commercial Code (HGB) and the German Tax Code (AO). This means that we will delete your personal data at the latest 10 years after the end of the contract after the expiry of the legal storage obligations. In individual cases, the deadline may be extended (e.g. in the case of ongoing tax audits or in the context of the preservation of evidence).

6. Your rights

If you have any questions or complaints regarding data protection, please feel free to contact us or our data protection officer (see above). You have the right to information pursuant to Art. 15 GDPR, the right to rectification pursuant to Art. 16 GDPR, the right to deletion pursuant to Art. 17 GDPR, the right to restriction of processing pursuant to Art. 18 GDPR, the right to objection pursuant to Art. 21 GDPR and the right to data portability pursuant to Art. 20 GDPR. In addition, you have the option of contacting the competent supervisory authority.

7. Right of objection

If the processing of data is based on Art. 6 Par. 1f) GDPR, you have the right to object to this processing at any time for reasons arising from your particular situation. Please contact the contact person known to you directly.

8. Necessity of providing personal data

As part of our business relationship, you must provide the personal information necessary to establish and conduct the business relationship and to fulfil the contractual obligations associated therewith, or which we are legally required to collect. Without this data we cannot conclude and execute the contract with you.

9. Automated decision making

There shall be no automated decision-making, including profiling, for the purpose of establishing and implementing this agreement.

10. Data sources

We process personal data that we have received from our business partners and their contact persons in the course of our business relationship. We also process personal data that we are permitted to collect from publicly accessible sources, e.g. databases, commercial registers, the press and the Internet, as well as data from credit agencies. We also process personal data that we are permitted to collect from companies within our Group or from other third parties.

11. Change clause

As our data processing is subject to change, we will also change our privacy policy from time to time.