# Privacy Notice

*Last updated January 2026*

This privacy notice for Margna Peak Advisors AG ("we," "us," or "our"), describes how and why we might collect, store, use, and/or share ("process") your information when you use our services ("Services"), such as when you:

- Visit our website, or any website of ours that links to this privacy notice
- Engage with us in other related ways, including any contractual relationship as a client or employee, marketing, or events

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at dpo@margnapeak.com.

## Summary of key points

This summary provides key points from our privacy notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use. Learn more about personal information you disclose to us.

Do we process any sensitive personal information? We may process sensitive personal information, when necessary, with your consent or as otherwise permitted by applicable law. Learn more about sensitive information we process.

Do we receive any information from third parties? We may receive information from public databases, marketing partners, social media platforms, and other outside sources. Learn more about information collected from other sources.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. Learn more about how.

How do we keep your information safe? We have organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more about how we keep your information safe.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information. Learn more about your privacy rights.

How do you exercise your rights? The easiest way to exercise your rights is by submitting a data subject access request, or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what we do with any information we collect? Review the privacy notice in full.

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# 1 Definitions

## Personal data

Personal data are all details that relate to a specific or identifiable natural person. These include title, first name and last name, address, poss. company for which you work, domicile, language, e-mail address, telephone number, nationality name, postal address and, date of birth. Personal data can also include data about personal preferences such as hobbies or memberships.

## Particularly sensitive personal data or special category data

These include data about religious, ideological, political or trade union-related opinions or activities; health data and any details of administrative or criminal proceedings or penalties. Even greater requirements concerning confidentiality and the handling of such data apply at MARGNA to the processing of particularly sensitive data than is already the case. It is not MARGNA's intention to seek any sensitive data unless legally required. **MARGNA suggests that you do not provide sensitive data of this nature unless it's necessary for contractual purposes and informs you that if you choose to do so, this is at your own risk.**

## Profiling

Profiling is the assessment of specific features of a person on the basis of automatically processed personal data, among other things in order to analyze and predict work performance, financial circumstances, health, behavior, preferences, whereabouts or mobility. MARGNA is not profiling data and will notify you in advance about all kinds of profiling.

## Aggregated data

In some cases, we anonymize the data disclosed by you and use them in aggregated, anonymized form. We occasionally combine such data with other data to enable us to compile anonymous statistics (e.g., about visitor numbers or the domain name or internet provider from which our websites are accessed). This serves to improve our products and services.

## Other data

- Data in connection with benefits if you have a contractual relationship with us as our business partner
- Data in connection with online communication with MARGNA;
- Data in connection with the marketing of products and services: These include details such as newsletter registrations/cancellations, received documents and special activities, personal preferences and interests etc.;
- To the extent permitted, we also obtain certain data from publicly accessible sources (e.g. commercial registers, the press, internet) from authorities or other third parties.

The processing of your personal data is primarily carried out by employees of MARGNA. Such employees in each case have access to the data required for fulfilling the task at hand.

# 2 What information do we collect?

## Personal information you disclose to us

*In Short: We collect personal information that you provide to us.*

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

## Personal Information Provided by You

*In Short: The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use.*

The personal information we collect may include the following:

- names
- phone numbers
- email addresses
- mailing addresses
- job titles
- contact preferences
- contact or authentication data
- billing addresses

Sensitive Information. When necessary, with your consent or as otherwise permitted by applicable law, we process the following categories of sensitive information:

- financial data
- credit worthiness data

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

## Information automatically collected

*In Short: Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.*

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

- Log and Usage Data. Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called "crash dumps"), and hardware settings).
- Device Data. We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.
- Location Data. We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

## Information collected from other sources

*In Short: We may collect limited data from public databases, marketing partners, and other outside sources.*

In order to enhance our ability to provide relevant marketing, offers, and services to you and update our records, we may obtain information about you from other sources, such as public databases, data providers, and from other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), Internet Protocol (IP) addresses, social media profiles, social media URLs, and custom profile.

# 3 Why do we collect, process and use personal data?

*In Short: We may process personal data as described above for the provision of our services and/or for our own legally prescribed purposes and to the extent legally permitted.*

This is understood as referring to the following:

- Processing, improving, managing and executing our products and services (e.g., accounts, payments, invoices, cards, financing, financial planning, investment, succession planning) as well as to update the data of individuals with whom we maintain a business relationship.
- Product and service development, statistics, business decisions (e.g., developing ideas for new or assessing existing products, services, procedures, technologies and returns, establishing key figures for the use of services and utilization figures).
- Managing, controlling and monitoring business related decisions and risks, processing business in good time (e.g., investment profiles, limits, market, credit, operational and fraud risks).
- System administration and reporting aggregated statistical information about browsing patterns and action which does not identify any individual.
- Compliance, legal and/or regulatory disclosure, notification and reporting obligations to authorities, courts, including but not limited to money laundering and terrorist financing (e.g., automatic exchange of information with foreign tax authorities, prosecution departments).
- Market research, marketing, comprehensive client service, advise and information regarding range of services and products etc. (e.g., events for clients, prospects and interested third parties, cultural events, sponsorship, assessment of client, market or product potential, information regarding changes, determination of client satisfaction, online and hardcopy advertisement).
- Protection of our interests and rights in case of claims against us or our employees and clients.

MARGNA may communicate with you via e-mail or physical newsletters containing and offering news. If you would rather not receive newsletters from us, you may “opt out” by contacting us.

# 4 How do we process your information?

In Short: We process your information to provide, improve, and administer our Services, communicate with *you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.*

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- To deliver and facilitate delivery of services to the user. We may process your information to provide you with the requested service.
- To respond to user inquiries/offer support to users. We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- To protect our Services. We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.
- To save or protect an individual's vital interest. We may process your information when necessary to save or protect an individual’s vital interest, such as to prevent harm.

# 5 What legal bases do we rely on to process your information?

*In Short: We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e., legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfill our contractual obligations, to protect your rights, or to fulfill our legitimate business interests.*

## If you are located in the EU or UK, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- Consent. We may process your information if you have given us permission (i.e., consent) to use your personal information for a specific purpose. You can withdraw your consent at any time. Learn more about withdrawing your consent.
- Performance of a Contract. We may process your personal information when we believe it is necessary to fulfill our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
- Legitimate Interests. We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to diagnose problems and/or prevent fraudulent activities
- Legal Obligations. We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- Vital Interests. We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

# 6 How long do we keep your information?

*In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than necessary.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## 7 How do we keep your information safe?

*In Short: We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

## 8 Do we collect information from minors?

*In Short: We do not knowingly collect data from or market to children under 18 years of age.*

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data, we may have collected from children under age 18, please contact us at dpo@margnapeak.com.

## 9 What are your privacy rights?

*In Short: In some regions, such as the European Economic Area (EEA), United Kingdom (UK), and Switzerland, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time*

In some regions (like the EEA, UK, and Switzerland), you have certain rights under applicable data protection laws. These may include the right

- to request access and obtain a copy of your personal information,
- to request rectification or erasure;
- to restrict the processing of your personal information;
- if applicable, to data portability; and
- not to be subject to automated decision-making.

In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section "how can you contact us about this notice?" below.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your Country of Residence data protection authority or UK data protection authority.

If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services. You may also opt out of interest-based advertising by advertisers on our Services.

If you have questions or comments about your privacy rights, you may email us at dpo@margnapeak.com.

# 10 Visit to Margnapeak.com website

Please be advised that data transferred over the Internet may not be subject to any adequate security while in transit even if the sender and recipient are both located in the same country. We cannot guarantee the security of data transferred over the Internet and accept no liability in respect thereof. Any notices emailed to us by you may not be secure. If you send any confidential information via email to us, you do so at your own risk. When contacting us, please send data via a secure mechanism, where appropriate, instead of over the Internet. The sender and recipient can still be identified even when the information transmitted is encrypted. As a result, a third party could —inadvertently or otherwise—infer that there is a commercial relationship between you and MARGNA. Therefore, we recommend avoiding the transmission of any strictly confidential information via the internet.

The processing of the personal data of the users of our website is limited to the data that are required for the provision of a functioning website, its content and our products and services.

The processing of such data only takes place for the purposes communicated to and agreed with you or if another legal basis (within the meaning of prevailing data protection legislation) exists for this. Only those personal data are collected that are actually required for the product-related implementation and processing of our services or that you voluntarily make available to us. An exception applies in those cases in which it is not possible to obtain prior consent for factual reasons or processing of the data is permitted by law.

It may be that we collect and process non-personal information about your visit to our websites such as data about your internet provider, operating system, websites visited, previously visited websites, searches conducted and the date and time of the website visit. We use this information to improve the content of the website and to compile anonymous statistics for internal market analysis purposes about individual use of the website.

## Linked websites

MARGNA makes no assurances in connection with third-party websites that can be accessed via a link on the margnapeak.com website. Information contained on third-party websites is independent of MARGNA's own information. Links, hyperlinks and web addresses leading to one or more other websites are for information purposes only and do not imply that MARGNA assumes responsibility for the content of such websites or approves their content or use. This privacy policy only applies to the website operated by

MARGNA and we recommend contacting third-party providers directly regarding their applicable data protection guidelines.

## Contact form

Should you complete a contact form on our website or send us an e-mail or other electronic message, your details will only be stored for processing your inquiry and for any associated further questions and exclusively used for your inquiry. By completing the form, you consent to the storage and processing of the applicable personal data.

## Server logfiles

MARGNA may collects data about access to its website via so-called server logfiles. The anonymized access data collected may include:

- Name and title of the website retrieved;
- Definition of retrieved file;
- Date and time of retrieval;
- Transferred data volume;
- Notification of successful retrieval and any previously visited site;
- Browser type including version;
- Operating system of user;
- Referrer URL (previously visited site);
- IP address (address in computer networks) and requesting provider;
- User name (user ID) for use of our customer portal;
- Device (e.g., PC or smartphone).

MARGNA uses the log data only for statistical evaluations for the purpose of safeguarding the operation, security and enhancement of its website. MARGNA reserves the right to review the log data subsequently if there is a justified suspicion based on specific grounds of unlawful use.

These data are deleted as soon as they are no longer required for achievement of the purpose of their collection and there is no legal basis for their retention.

## Cookies

We may use cookies and comparable technologies on our website that can be used to identify your browser or device in order to make our website user-friendly. Cookies are small files that your browser automatically creates and that are stored on your device (laptop, tablet, smartphone etc.) when you visit our site. If you click to retrieve our website again at a later time, we are able to recognize you thanks to the cookies. However, we do not know who you are but merely that your computer has already visited our website in the past. As well as cookies that are only used during a session and are deleted again after your visit to the applicable website (“session cookies”), cookies can also be used to store user settings and other information over a given period of time (“permanent cookies”). However, you can configure your browser in such a way that it rejects cookies, only stores them for a session or otherwise deletes them prematurely.

When calling up the websites of MARGNA you will be informed about the use of cookies for analytic purposes and your consent will be sought for the processing of the data used in this connection.

Data received via cookies are primarily used for website administration purposes, the collection of demographic data and to monitor the use and performance of a website.

You can normally deactivate the cookie function or install corresponding filters on the device or in the browser with which you access our websites. In this case you may not be able to retrieve all the information and data of the applicable website.

## Options when disclosing personal data

Should you decide to disclose personal data in the forms or data fields on our websites intended for this, you are entitled to view and amend your data at any time by selecting the relevant application. Certain websites may ask for your consent to use the data concerning you for specific purposes. You can subsequently consent to or deny such use.

## Integration of third-party services and content

Third-party content such as map material from Google Maps are partially integrated within our online offering. This is at all times contingent on the providers of such content (hereinafter referred to as “third-party providers”) knowing your IP address. Without this IP address the third-party providers are unable to send the content to your browser. The IP address is thus essential for the presentation of such content. We endeavor only to use content for which the providers use the IP address only for delivery. However, we have no influence on the extent to which third-party providers store the IP address, for example for statistical purposes. We undertake to inform users accordingly where we are aware of this.

## Controls for do not track-features

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

# 11 Do California residents have specific privacy rights?

*In Short: Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.*

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with Services, you have the right to request removal of unwanted data that you publicly post on the Services. To request removal of such data, please contact us using the contact information provided below and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g., backups, etc.).

## CCPA Privacy Notice

The California Code of Regulations defines a "resident" as:

- every individual who is in the State of California for other than a temporary or transitory purpose and
- every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

All other individuals are defined as "non-residents." If this definition of "resident" applies to you, we must adhere to certain rights and obligations regarding your personal information.

## What categories of personal information do we collect?

We have collected the following categories of personal information in the past twelve (12) months:

| Category | Examples | Collected |
|---|---|---|
| A. Identifiers | Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name | YES |
| B. Personal information categories listed in the California Customer Records statute | Name, contact information, education, employment, employment history, and financial information | YES |
| C. Protected classification characteristics under California or federal law | Gender and date of birth | YES |
| D. Commercial information | Transaction information, purchase history, financial details, and payment information | YES |
| E. Biometric information | Fingerprints and voiceprints | NO |
| F. Internet or other similar network activity | Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems, and advertisements | NO |
| G. Geolocation data | Device location | NO |
| H. Audio, electronic, visual, thermal, olfactory, or similar information | Images and audio, video or call recordings created in connection with our business activities | NO |
| I. Professional or employment-related information | Business contact details in order to provide you our Services at a business level or job title, work history, and professional qualifications if you apply for a job with us | YES |
| J. Education Information | Student records and directory information | NO |
| K. Inferences drawn from other personal information | Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics | YES |
| L. Sensitive Personal Information | Contents of email or text messages, drivers' licenses and passport numbers | YES |

We will use and retain the collected personal information as needed to provide the Services or for:

Category A - MARGNA will only store your personal data for as long as legally necessary

Category B - MARGNA will only store your personal data for as long as legally necessary

Category C - MARGNA will only store your personal data for as long as legally necessary

Category I - MARGNA will only store your personal data for as long as legally necessary

Category K - MARGNA will only store your personal data for as long as legally necessary

Category L - MARGNA will only store your personal data for as long as legally necessary

Category L information may be used, or disclosed to a service provider or contractor, for additional, specified purposes. You have the right to limit the use or disclosure of your sensitive personal information.

We may also collect other personal information outside of these categories through instances where you interact with us in person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

## How do we use and share your personal information?

More information about our data collection and sharing practices can be found in this privacy notice.

You may contact us by email at dpo@margnapeak.com, or by referring to the contact details at the bottom of this document.

If you are using an authorized agent to exercise your right to opt out, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

## Will your information be shared with anyone else?

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Each service provider is a forprofit entity that processes the information on our behalf, following the same strict privacy protection obligations mandated by the CCPA.

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be "selling" of your personal information.

We have not disclosed, sold, or shared any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months. We will not sell or share personal information in the future belonging to website visitors, users, and other consumers.

## Your rights with respect to your personal data

### Right to request deletion of the data — Request to delete

You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation, or any processing that may be required to protect against illegal activities.

### Right to be informed — Request to know

Depending on the circumstances, you have a right to know:

- whether we collect and use your personal information;
- the categories of personal information that we collect;
- the purposes for which the collected personal information is used;
- whether we sell or share personal information to third parties;
- the categories of personal information that we sold, shared, or disclosed for a business purpose;

- the categories of third parties to whom the personal information was sold, shared, or disclosed for a business purpose;
- the business or commercial purpose for collecting, selling, or sharing personal information; and
- the specific pieces of personal information we collected about you.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

### Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against you if you exercise your privacy rights.

### Right to Limit Use and Disclosure of Sensitive Personal Information

If the business collects any of the following:

- social security information, drivers' licenses, state ID cards, passport numbers
- account login information
- credit card numbers, financial account information, or credentials allowing access to such accounts
- precise geolocation
- racial or ethnic origin, religious or philosophical beliefs, union membership
- the contents of email and text, unless the business is the intended recipient of the communication
- genetic data, biometric data, and health data
- data concerning sexual orientation and sex life

you have the right to direct that business to limit its use of your sensitive personal information to that use which is necessary to perform the Services.

Once a business receives your request, they are no longer allowed to use or disclose your sensitive personal information for any other purpose unless you provide consent for the use or disclosure of sensitive personal information for additional purposes.

Please note that sensitive personal information that is collected or processed without the purpose of inferring characteristics about a consumer is not covered by this right, as well as the publicly available information.

To exercise your right to limit use and disclosure of sensitive personal information,

please email compliance@margnapeak.com or submit a data subject access request.

### Verification process

Upon receiving your request, we will need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g., phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. However, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

### Other privacy rights

- You may object to the processing of your personal information.
- You may request correction of your personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the information.
- You can designate an authorized agent to make a request under the CCPA on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with the CCPA.
- You may request to opt out from future selling or sharing of your personal information to third parties. Upon receiving an opt-out request, we will act upon the request as soon as feasibly possible, but no later than fifteen (15) days from the date of the request submission.

To exercise these rights, you can contact us by email at dpo@margnapeak.com, or by referring to the contact details at the bottom of this document. If you have a complaint about how we handle your data, we would like to hear from you.

## 12 Do Virginia residents have specific privacy rights?

*In Short: Yes, if you are a resident of Virginia, you may be granted specific rights regarding access to and use of your personal information.*

### Virginia CDPA Privacy Notice

Under the Virginia Consumer Data Protection Act (CDPA):

"Consumer" means a natural person who is a resident of the Commonwealth acting only in an individual or household context. It does not include a natural person acting in a commercial or employment context.

"Personal data" means any information that is linked or reasonably linkable to an identified or identifiable natural person. "Personal data" does not include de-identified data or publicly available information.

"Sale of personal data" means the exchange of personal data for monetary consideration.

If this definition "consumer" applies to you, we must adhere to certain rights and obligations regarding your personal data.

The information we collect, use, and disclose about you will vary depending on how you interact with us and our Services. To find out more, please visit the following links:

- Personal data we collect
- How we use your personal data
- When and with whom we share your personal data

### Your rights with respect to your personal data

- Right to be informed whether or not we are processing your personal data
- Right to access your personal data
- Right to correct inaccuracies in your personal data
- Right to request deletion of your personal data
- Right to obtain a copy of the personal data you previously shared with us
- Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ("profiling")

We have not sold any personal data to third parties for business or commercial purposes. We will not sell personal data in the future belonging to website visitors, users, and other consumers.

### Exercise your rights provided under the Virginia CDPA

More information about our data collection and sharing practices can be found in this privacy notice.

You may contact us by email at compliance@bel.com, by submitting a data subject access request, or by referring to the contact details at the bottom of this document.

If you are using an authorized agent to exercise your rights, we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

### Verification process

We may request that you provide additional information reasonably necessary to verify you and your consumer's request. If you submit the request through an authorized agent, we may need to collect additional information to verify your identity before processing your request.

Upon receiving your request, we will respond without undue delay, but in all cases, within forty-five (45) days of receipt. The response period may be extended once by forty-five (45) additional days when reasonably necessary. We will inform you of any such extension within the initial 45-day response period, together with the reason for the extension.

### Right to appeal

If we decline to take action regarding your request, we will inform you of our decision and reasoning behind it. If you wish to appeal our decision, please email us at dpo@margnapeak.com. Within sixty (60) days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If your appeal if denied, you may contact the Attorney General to submit a complaint.

## 13 Do we make updates to this notice?

*In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.*

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

## 14 How can you contact us about this notice?

If you have questions or comments about this notice, you may email us at dpo@margnapeak.com or contact us by post. Responsibility for the data collection and processing described here lies with:

Margna Peak Advisors AG
Data Protection Officer
Tödistrasse 16
8002 Zürich
Switzerland

www.margnapeak.com

dpo@margnapeak.com

## 15 How can you review, update, or delete the date we collect from you?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please fill out and submit a data subject access request.