

Data Protection Policy

This data protection policy describes how **PALMS FAMILY OFFICE SUISSE SA** ("the Company") processes personal data that it may receive as a data controller. Any modification or update to this policy is communicated to the Company's clients via the website: www.palms-familyoffice.com. It is recommended to regularly consult the Company's website in order to always have the latest version of the Company's data protection policy.

1. Data Controller

The Company can be contacted at the following address for any questions or complaints: geneva@palms-familyoffice.com

2. Types of Personal Data Collected

As part of its business relationships with clients and the resulting legal and contractual obligations, the Company processes personal data generally received directly from its clients, including:

- Identification and contact data, such as name, first name, date of birth, telephone number, address;
- Data related to family and professional profile, such as the profession exercised, investment knowledge;
- Financial and tax data, such as income, gains and investments, debts, tax residence;
- Data related to interactions with the Company and use of the Company's services, such as letters and emails;
- Any other data that the Company must collect under a legal obligation.

As part of its legal obligations, the Company may also, in certain cases, collect personal data from third parties, for example by accessing public databases (such as internet search engines) or paid databases (such as press subscriptions).

The Company does not collect any personal data through its website.

3. Third-Party Data

If a client provides the Company with personal data of third parties, the client must ensure that the data subject has been informed of this data protection policy.

4. Purpose of Processing

The Company processes its clients' personal data in particular to provide the requested services, fulfill its legal obligations, and where there are overriding legitimate interests (for example, to exercise a right).

5. Disclosure to Third Parties

Personal data is transferred to third parties when necessary to perform the requested services, including for the execution of transactions (e.g., disclosure to a bank or a securities firm). In addition, the Company reserves the right to outsource the processing of personal data to third parties who are contractually bound to confidentiality, such as IT or compliance services. Personal data may also be disclosed to its legal advisors, audit firms, authorities, courts, or similar institutions when the Company is required to disclose information under applicable law or regulation, or to protect its legitimate interests.

6. International Disclosure

The Company may need to transfer personal data abroad to perform its contract, particularly if the client's custodian bank is located abroad or if required by law or applicable regulation. The Company undertakes to ensure that any international transfer complies with applicable provisions.

7. Deletion

Personal data is deleted when it is no longer reasonably necessary to provide services, if the Company is not required to retain it due to legal obligations, unless the Company has an overriding private interest in retaining the relevant data.

8. Rights of Data Subjects

Any person concerned by the processing of personal data has the right to access their personal data, have it rectified, prohibit or restrict its processing, request its deletion, and in certain cases request that it be returned or transmitted to a third party. The Company may be entitled to refuse to act on a request if it is legally obliged to process the data concerned or if there is an overriding private interest of the Company or a third party.

9. Data Security

The Company takes appropriate technical and organizational measures to protect the security of personal data, in compliance with applicable law.

10. Modifications

This data protection policy may be modified at any time; such modifications take effect upon publication on the Company's website.

Last modified: June 4, 2025