

Policy of confidentiality

Dear customers,

As part of the delivery of services and within the scope of its commercial activities, RESCAD SA, hereinafter the "Company" is required to process various data. This information notice reflects the desire to ensure respect for the confidentiality and security of personal data the Company has been entrusted with. The Data Protection Act (LPD) applies to all employees (collaborators and administrators).

1. SCOPE

The Law applies to all personal data collected, stored, processed or transmitted by the Company, regardless of their format or medium.

2. PRINCIPLES APPLICABLE TO DATA PROTECTION

a. Legal, ethical and transparent nature

• The Company processes personal data in a lawful, fair and transparent manner, always respecting the applicable regulations.

b. Objectives

- If necessary, the Company will endeavor to seek and obtain consent in an explicit, free, informed and specific manner.
- The Company only collects personal data for specific, explicit and legitimate purposes directly related to its business activities.
- The Company limits the processing of personal data to what is strictly necessary to fulfill its legal and regulatory obligations, except with the explicit consent of the owner of the data or in the cases provided for by law.

c. Data limitation

- The Company only collects and retains the personal data necessary for the exercise of its commercial activities and the respect of its legal and regulatory obligations.
- The Company reviews the personal data it collects and takes steps to limit the collection of unnecessary or excessive data.

d. Accuracy

- The Company takes reasonable steps to ensure that personal data is accurate, up-todate and relevant.
- The Company rectifies or deletes inaccurate or outdated personal data.

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e. Data security

• The Company ensures that personal data is protected against unauthorized access, disclosure, alteration or destruction.

f. Storing limitation

• The Company retains personal data only for the time necessary to achieve the purposes for which it was collected, in accordance with applicable regulatory requirements.

g. Disclosure

• The Company only discloses personal data to authorized persons and in compliance with legal obligations.

h. Confidentiality and integrity

• The Company sets up and maintains appropriate technical and organizational measures to guarantee the confidentiality, integrity and security of personal data, in accordance with regulatory requirements.

i. Responsibility

• The Company regularly reviews and updates its data protection practices to ensure ongoing compliance with regulatory requirements.

3. RIGHTS OF CONCERNED PERSONS

The Company recognizes and respects the rights of concerned persons as provided for by law, and commits to respond quickly and within the time limits provided for by law to requests from concerned persons regarding their rights of data of a personal nature. Concerned persons have the following rights and can exercise them by contacting our Data Protection Officer:

- The right to be informed about the processing of their personal data.
- The right to access their personal data and to obtain a copy of it.
- The right to rectify inaccurate or incomplete personal data.
- The right to delete ("right to be forgotten") in certain circumstances (if not prohibited by law).
- The right to restrict processing in specific situations.
- The right to data portability, where applicable.
- The right to object to the processing of personal data, including automated decisionmaking.
- The right not to be the subject of a decision based exclusively on automated processing, including profiling.



4. DATA TRANSFER AND THIRD-PARTY PROCESSORS

a. International data transfers

The Company ensures that any international transfer of personal data complies with the requirements of the LPD.

b. Third-party processors

The Company only engages third-party subcontractors who are known to implement appropriate technical and organizational measures to protect personal data or who provide sufficient guarantees in this regard.

5. NOTIFICATION OF VIOLATION

In the unlikely event of a personal data breach, the Company promptly assesses the impact and takes appropriate steps to mitigate and address the breach, in accordance with applicable regulatory requirements. It commits to inform the persons concerned and the competent authorities as required by law.

6. CONTACT INFORMATION

If you have any questions regarding this notice, please contact our Data Protection Officer:

RESCAD SA Data Protection Officer PO Box 1803 1211 Geneva 26 Telephone: +41 22 342 23 00