

## Privacy Policy

### Lorzen Capital Partners AG — Data Protection Notice

Effective date: 15 January 2026 · Switzerland

#### 1. Data Controller

Lorzen Capital Partners AG, Bahnhofstrasse 10, 6300 Zug, Switzerland, is the data controller responsible for processing your personal data. For inquiries, contact [info@lorzen-capitalpartners.com](mailto:info@lorzen-capitalpartners.com).

UID: CHE-226.184.032 | LEI: 5067007J4G5Y636CBS26 | Regulator: FINMA (portfolio manager (independent asset manager))

#### 2. Legal Basis

We process personal data in compliance with the Swiss Federal Act on Data Protection (FADP) and under the supervision of the Swiss Financial Market Supervisory Authority.

Data processing is necessary for the performance of the asset management agreement and to comply with legal obligations (AML, tax reporting, regulatory reporting).

#### 3. Data We Collect

- (a) Identification data: full name, date of birth, nationality, ID documents (KYC).
- (b) Contact data: address, email, phone number.
- (c) Financial data: custodian bank account details, transaction history, portfolio holdings, source of funds.
- (d) Technical data: IP address, login times, device information (for security).

#### 4. How We Use Data

To provide asset management services: manage portfolios, transmit instructions to your custodian bank, provide reporting.

To comply with legal obligations: AML/KYC checks, tax reporting (CRS, FATCA), regulatory reporting to FINMA and the supervisory organisation.

To protect our systems: fraud prevention, security monitoring, audit trails.

#### 5. Data Sharing

We do not sell or rent personal data. Data is shared only when necessary:

- (a) With your custodian bank and regulated trading venues (to execute and settle transactions).
- (b) With regulators, the supervisory organisation, and tax authorities (as required by law).
- (c) With professional advisors (auditors, lawyers) under confidentiality obligations.

## 6. Data Storage and Security

Data is stored in Switzerland in secure data centres. We use encryption, access controls, and regular security audits.

Personal data is retained for the duration of the client relationship plus 10 years (legal record-keeping requirements).

## 7. Your Rights

You have the right to: (a) access your data; (b) correct inaccurate data; (c) request deletion (subject to legal retention requirements); (d) object to processing; (e) lodge a complaint with the Swiss Federal Data Protection and Information Commissioner (FDPIC).

**This document is provided for information purposes only. It is not a certificate of authenticity and bears no official seal, signature or stamp. The current version and the regulatory status of the Company can be verified in the public FINMA register and on the official company website.**