

^{1/6} **Data protection information under the EU General Data Protection Regulation (GDPR) for authorized representatives/agents of legal entities**

This information is applicable for current and potential clients of Bank Vontobel Europe AG (hereinafter referred to as “Vontobel” or “we”).

Vontobel is committed to comply with bank-client confidentiality as well as data protection laws and regulations and to thus ensuring the protection and confidentiality of your Personal Data. The following information shall provide an overview of how we process your Personal Data and of your rights under data protection laws and regulations. Which specific data are processed and how they are used depends largely on the services requested or agreed in each case. However, Vontobel processes data about individuals (“Personal Data”), including data about employees, contractors, shareholders, partners and/or any other relevant persons linked to our business partners (“Affected Persons”).

Please also forward this information to the current and future representatives of your company, as well as to all other Affected Persons on which you have already provided or on which you will provide Personal Data to us in the course of our business relationship.

1. Who is responsible for the data processing and who can I contact in this regard

The following unit is responsible for the data processing:

Bank Vontobel Europe AG
Alter Hof 5
80331 Munich
Germany

Additionally you can contact our corporate data protection officer (DPO):

Bank Vontobel Europe AG
c/o Data Protection Officer
Alter Hof 5
80331 Munich
Germany

E-Mail: dpo.de@vontobel.com

2/6 **2. What source and what type of data do we process**

We process Personal Data that we receive from you in your capacity as an Affected Person.

We process Personal Data which has been or will be given to us from our current and/or potential business partners in the context of our business relationship.

Should it be necessary for the provision of our services, we process Personal Data that we lawfully (e.g., for performing contracts or on the basis of your consent) received from other entities within the Vontobel Group or other third parties (such as private commercial databases). Additionally, we process Personal Data from publicly available sources (e. g., debtor directories, land registers, commercial registers and registers of associations, press, Internet) which we lawfully obtain and are permitted to process.

Further, we process Personal Data of Affected Persons such as name, address and other contact details (telephone, e-mail address), title, date of birth, gender, nationality, marital status, partner type data (employed / self-employed), identification data (such as ID, tax-ID), certification data (such as specimen signatures) and contract related data.

When we conduct due diligence checks, or if products and/or services are purchased and used, additional Personal Data may be collected, processed and stored in addition to the aforementioned data (such as information and records on your professional knowledge of and/or experience with financial instruments, CVs, criminal records or any other information publicly available or accessible through third party providers).

3. Does Vontobel collect special categories of data (Art. 9 GDPR)

To the extent that we process any special categories of data relating to Affected Persons, we will do so because the processing is necessary for the establishment, exercise or defense of a legal claim, for reasons of substantial public interest or they have given their explicit consent to Vontobel to process that data (where legally permissible). In that sense, we might process biometric data that is classified as sensitive personal data (Art. 4 (14), Art. 9 (1) GDPR). In this respect, your explicit consent will be required in a separate procedure in order to obtain a biometric identification (e.g. Touch ID) to use it for access to certain applications.

4. For what purpose do we process your data and on what legal basis

We process the aforementioned personal data in compliance with the provisions of the EU General Data Protection Regulation (GDPR).

4.1. On the basis of your consent (Art. 6 (1) (a) GDPR)

Insofar as you have granted us consent to the processing of personal data for specific purposes (such as transfer of data within the Vontobel Group, analysis of trading activities for marketing purposes etc.), the lawfulness of such processing is based on your consent. Any consent granted may be revoked at any time. This also applies to the revocation of declarations of consent that are granted to us prior to the entry into force of the GDPR, i.e., prior to 25th of May 2018.

3/6 Please be advised that the revocation shall only have effect for the future. Any processing that was carried out prior to the revocation shall not be affected thereby.

4.2. For fulfillment of contractual obligations (Art. 6 (1) (b) GDPR)

Data is processed in order to provide banking business and financial services in the context of carrying out our contracts with our clients or to carry out pre-contractual measures that occur as part of a request. The purposes of data processing are primarily in compliance with the specific products and services (such as bank account, credit, saving with building societies, securities, deposits, client referral) and can include needs assessments, advice, asset management and support, as well as carrying out transactions. You can find other details about the purposes of data processing in the relevant contract documents and terms and conditions.

4.3. For compliance with a legal obligation (Art. 6 (1) (c) GDPR) or in the public interest (Art. 6 (1) (e) GDPR)

As a licensed bank and broker, we are also subject to various legal obligations, i.e., statutory requirements (such as the German Banking Act, German Investment Code, German Stock Exchange Act, German Securities Trading Act, ordinances and circulars issued by the German Federal Financial Supervisory Authority (BaFin) and the European Securities and Markets Authority (ESMA), tax laws) and bank regulatory requirements of the Deutsche Bundesbank, BaFin and ESMA. Other purposes of processing include assessment of creditworthiness, identity and age verification, anti-fraud and anti-money laundering measures, the satisfaction of tax law control and reporting obligations as well as the assessment and management of risks in the bank and the Vontobel Group.

4.4. For the purposes of safeguarding legitimate interests (Art. 6 (1) (f) GDPR)

Where necessary, we process your data beyond the actual performance of our contractual obligations in order to safeguard the legitimate interests pursued by us or a third party, which does not unduly affect your interest or fundamental rights and freedoms. Besides the following examples, we also obtain Personal Data from publicly available sources for client acquisition purposes:

- Marketing or market and opinion research, unless you have objected to the use of your data;
- Asserting legal claims and defense in legal disputes;
- Guarantee of a bank's IT security and IT operation;
- Prevention and investigation of crimes;
- Measures for building and site security (e.g. admittance controls);
- Measures for ensuring the right of the owner of premises to keep out trespassers;
- Measures for business management and further development of services and products;
- Group risk management.

For all the data processing foreseen in para. 4.2 to 4.4 the juridical base of the data processing is constituted by the necessity of carrying out a legal obligation. Therefore in those cases the obtaining of your preventive consent to this data processing is not necessary.

5. Who receives your data

Within Vontobel, those units are given access to your data which require them in order to perform our contractual, legal and regulatory obligations. Service providers and vicarious agents employed by us can also receive access to data for the purposes given, if they maintain banking confidentiality and our written instructions under data protection law and regulation. These are companies in the categories of banking services, IT services, logistics, printing services, telecommunications, collection, advice and consulting, sales and marketing.

With regard to transferring data to recipients outside Vontobel, it must first of all be noted that as a bank we are under a duty to maintain secrecy about any client-related facts and evaluations of which we may have knowledge. We may only disclose information about you if we are legally required to do so, if you have given your consent, if we are authorized to provide bank information and / or if processors commissioned by us guarantee compliance with banking secrecy and the provisions of the GDPR.

6. Is data transferred to a third country or to an international organization

Data will only be transferred to countries outside the EU or the EEA (so-called third countries) if this is required for the execution of your client's orders (such as payment and securities orders), prescribed by law (such as reporting obligations under tax law), if we have received consent or in the context of commissioned data processing. If service providers in a third country are used, they are obligated to comply with the data protection level in Europe in addition to written instructions by agreement of the EU standard contractual clauses.

We take our obligation seriously to ensure that any transfers outside the EU or the EEA are only made where the transfer is made to entities that can demonstrate equivalence in standards of security and other relevant data processing requirements.

7. For how long will my data be stored

We process and store your Personal Data as long as it is necessary for the performance of our contractual obligations and as long as you are authorized to represent the respective legal entity in dealings with us. In this regard, it should be noted that our business relationship is a continuing obligation designed to last for several years.

If the data are no longer required for the performance of our contractual and statutory obligations, they are regularly deleted.

8. Data protection rights

8.1. In general

Every data subject has the right to access (Art. 15 GDPR), the right to rectification (Art. 16 GDPR), the right to erasure (Art. 17 GDPR), the right to restrict processing (Art. 18 GDPR), the right to object (Art. 21 GDPR), and if applicable, the right to data portability (Art. 20 GDPR). Furthermore, if applicable, every data subject has the right to lodge a complaint with an appropriate data privacy regulatory authority (Art. 77 GDPR).

^{5/6} You may revoke your consent to the processing of Personal Data at any time. This also applies to the revocation of declarations of consent that are granted prior to the entry into force of the EU General Data Protection Regulation, i.e., prior to 25th of May 2018. Please be advised that the revocation will only take effect in the future. Any processing that was carried out prior to the revocation shall not be affected thereby.

8.2. Ad hoc right of objection (Art. 21 GDPR)

You have the right to object, on grounds relating to your particular situation, at any time to processing of Personal Data concerning you which is based on processing in the public interest (Art. 6 (1) (e) GDPR) and for the purposes of safeguarding legitimate interests (Art. 6 (1) (f) GDPR); this includes any profiling based on those provisions within the meaning of Art. 4 (4) GDPR.

If you submit an objection, we will no longer process Personal Data unless we can give evidence of mandatory, legitimate reasons for processing which outweigh your interests, rights, and freedoms, or processing serves the enforcement, exercise, or defense of interests. Please note, that in such cases we will not be able to provide services and maintain a business relation.

9. Am I under any obligation to provide data

Within the scope of our business relationship with the legal entity you represent in dealings with us, you must provide personal data which is necessary for accepting and executing any representative authority / authorization and the performance of the associated contractual obligations or which we are legally obligated to collect. As a rule, we would not be able to accept you as the authorized representative / agent without these data or we would have to revoke any existing representative authority / authorization.

In particular, provisions of money laundering law require that we verify your identity before establishing the authority / authorization, for example, by means of your identity card and that we record your name, place of birth, date of birth, nationality and your residential address. In order for us to be able to comply with this statutory obligation, you must provide us with the necessary information and documents and notify us without undue delay of any changes that may arise during the course of the business relationship. If you do not provide us with the necessary information and documents, we will not be allowed to institute or continue the representative authority / authorization requested by the respective legal entity.

10. To what extent is automated decision-making (including profiling) carried out

As a rule, we do not make decisions based solely on automated processing as defined in Art. 22 GDPR to establish and implement the business relationship. If we use these procedures in individual cases, we will inform you of this separately, provided that this is prescribed by law. In such a case, you will have a right to object to these procedures under certain circumstances.

11. How do we protect Personal Data

All personnel accessing Personal Data must comply with the internal rules, policies and processes in relation to the processing of any Personal Data to protect them and ensure their confidentiality. They

6/6 are also required to follow all technical and organizational security measures put in place to protect the Personal Data.

Vontobel has also implemented adequate technical and organizational measures to protect Personal Data against unauthorized, accidental or unlawful destruction, loss, alteration, misuse, disclosure or access as well as against all other unlawful forms of processing. These security measures have been implemented taking into account the state of the art of the technology, their cost of implementation, the risks presented by the processing and the nature of the Personal Data, with particular care for sensitive data.

12. Contact

Please let us also know if we do not meet your expectations with respect to the processing of Personal Data or you wish to complain about our data protection practices; this gives us the opportunity to examine your issue and make improvements, where necessary. In any of these cases, please send us a clear request in writing or text form (by e-mail), together with a clearly legible copy of a valid official ID document (e.g. passport, ID card), to the entity or the DPO named in para. 1. We will acknowledge receipt as soon as received, examine your issue and reply in good time. If a full response will extend beyond one month, taking into account the complexity and number of the requests, we will advise you of this.

13. Other legislation aspects

In order to comply with other legislations, e.g. Directive 2014/65/EU of the European Parliament (MiFID II) we have to record telephone conversations in some of our legal entities with reference to operations concluded in the performance of our services. For further information about the treatment of your Personal Data in regard to this, please consult our complete information at: www.vontobel.com/mifid.

14. Changes to the Privacy Policy

This data protection information was last updated on 14th of May 2018. It may be subject to amendments. Any future change or additions to the processing of Personal Data as described above affecting you will be communicated to you through an appropriate channel (e.g., will be posted on our website).