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Privacy Notice

1) Who is responsible for your personal data and who can you contact?

EPICC (“EPICC”, “us” or “we”) does not process information and personal data (“Personal Data”) relating to you and/or any Related Person of yours [Related Person(s) and you together: the “Data Subject(s)”]. If we require to do so, we will inform so in connection with our existing and/or prospective business relationships, including your use of our websites and applications (together: the “Business Relationship”).

A “Related Person” means an individual or entity whose information that you or a third party provides to us and/or information that otherwise comes to our knowledge in connection with our Business Relationship. A Related Person may include, but is not limited to, (i) a director, officer or employee of a company; (ii) a trustee, settlor or protector of a trust; (iii) a nominee or beneficial owner of an account; (iv) a substantial interest owner in an account; (v) a controlling person; (vi) a payee of a designated payment; (vii) a representative or agent (i.e. with a power of attorney, a right to information on an account, an e-banking user); or (viii) an employer or contractor.

We therefore ask you to liaise with all of your Related Persons and to pass this Privacy Notice and the information it contains on to them. If you have any questions about this Privacy Notice, you can contact your relationship manager directly.

2) How do we handle your Personal Data?

We do not process Personal Data, however, we might be subject to certain confidentiality and/or secrecy obligations, e.g. those arising under laws governing data protection, contracts and professional secrecy, whichever may be applicable.

This Privacy Notice deals with the way we process Personal Data. That means how we collect, use, store, transmit or otherwise handle or process, operations collectively defined in this document as “Processing” or “Processing Operations”. This Privacy Notice does not replace, and remains subject to, any applicable contractual terms and conditions we might have.

For information related to contractual terms and conditions, we may conduct our Processing Operations either directly or indirectly, through other parties that process Personal Data on our behalf (the “Processors”).

3) What is Personal Data?

Personal Data includes any information relating to an identified or identifiable natural person or as defined in the applicable law.

Personal Data of Data Subjects may be based on the following principal legal bases, bearing in mind that they may also rely cumulatively on other legal bases different from the ones mentioned.

- On the legal basis of legal and regulatory obligations.

- On the legal basis of our legitimate interest.
- On the legal basis of your prior consent: such as certain cookie information, e.g. cookies and similar technologies on websites and in emails (see our Cookies policy).

4) For what purposes and on what legal bases can Personal Data be processed?

Purposes for which we process Personal Data (the “Purposes”) may be based on the following principal legal bases, bearing in mind that they may also rely cumulatively on other mentioned legal bases.

We might collect Personal Data relating to compliance with legal and regulatory obligations to which we might be subject, including to:

- comply with legal obligations relating to accounting, compliance with legislation on markets in financial instruments, outsourcing, foreign activity and qualified participation;
- carry out any other form of cooperation with, or reporting to, competent administrations, supervising authorities, law enforcement authorities and other public authorities [e.g. in the field of anti-money laundering and combating terrorism financing (AML-CTF)], for the prevention and detection of crime under tax law [e.g. Common Reporting Standard (CRS) or Foreign Account Tax Compliance Act (FATCA) or other tax legislation as applicable].

Furthermore, we may process Personal Data in connection with legitimate interests we pursue so that we can:

- develop our Business Relationship with you;
- improve the quality of our services and our internal business organization and operations;
- establish, exercise and/or defend actual or potential legal claims, investigations or similar proceedings.

If our Personal Data Processes presuppose that you give your prior consent to doing so, we will seek your consent in due time and you will have the right to withdraw your consent at any time by contacting your relationship manager directly.

The provision of personal data may be mandatory, e.g. with regard to our compliance with legal and regulatory obligations to which we might be subject to. Please be aware that failing to provide such information may preclude us from pursuing a Business Relationship with, and/or from rendering our services to you.

5) Do we rely on profiling or automated decision-making?

We do not use automated decision-making in connection with our Business Relationship and/or Data Subjects. If we do so, however, we will comply with applicable legal and regulatory requirements.

6) What sources can we use if we need to collect your Personal Data?

To achieve the Purposes, to collect or receive personal data:

- directly from the Data Subjects, e.g. when they contact us or by documentation sent directly to us; and/or
- indirectly from other external sources, including any publicly available sources [e.g. UN or EU sanctions lists, OFAC – Specially Designated Nationals (SDN) lists], information available through subscription services (e.g. Bloomberg, World Compliance PEP list) or information provided by other third parties.

7) Do we share your Personal Data with third parties?

We reserve the right to disclose or make accessible the Personal Data to the following recipients, provided this is legally or otherwise authorized or required:

- public/governmental administrations, courts, competent authorities (e.g. financial supervisory authorities);
- auditors or legal advisors.

We undertake not to collect nor transfer personal data to any third parties other than those listed above, except if disclosed to Data Subjects specifically from time to time or if required by applicable laws and regulations applicable to us or them or by any order from a court, governmental, supervisory or regulatory body, including tax authorities.

8) What are your rights in connection with data protection?

Subject to the limitations set forth in this Privacy Notice and/or in applicable local data protection laws, you can exercise the rights below free of charge by contacting your relationship manager directly:

- request access to, and receive a copy of, any Personal Data we might hold;
- request rectification or erasure of any Personal Data that is inaccurate;
- request that Personal Data be erased when it is no longer necessary for the Purposes;
- request a restriction of Processing of Personal Data;
- withdraw your consent at any time when the Personal Data Processing is based on your consent;
- object to the Processing of Personal Data, in which case we will only process any Personal Data unless an exception applies;
- receive any Personal Data we might have in structured, commonly used and machine-readable format (data portability right);
- complain to us about the Processing of Personal Data and, failing any satisfactory resolution of the matter, file a complaint about the Processing of Personal Data with the relevant data protection supervisory authority.

If a Data Subject objects to the Processing of Personal Data, we are nevertheless allowed to continue with the Processing if it is: (i) legally mandatory; or (ii) necessary for the purposes of the legitimate interests we pursue, including the establishment, exercise or defence of legal claims. We will not, however, use the Data Subject's Personal Data for direct marketing purposes.



9) How long are your Personal Data kept or stored?

In principle, we retain Personal Data for as long as we need to do so to achieve the Purposes. We will delete or anonymise Personal Data (or equivalent) once they are no longer necessary to achieve the Purposes, subject however: (i) to any applicable legal or regulatory requirements to store Personal Data for a longer period; or (ii) to establishing, exercising and/or defending actual or potential legal claims, investigations or similar proceedings, including legal holds. We may enforce any or all of the above mentioned under points (i) and (ii) to preserve relevant information.

Status as of February 2024.