

# **Privacy Policy**

## **1. Who We Are**

Swissarb SA, located at 3 place des Eaux-Vives, 1207 Geneva, Switzerland, is an advisor specializing in mechanical arbitrage, for high-net-worth individuals, family offices, and institutional investors.

## **2. Basic Principles of Data Processing**

This privacy policy explains how we handle personal data, including the type of data we collect and the purposes for which it is used. It also outlines the sharing of data, retention periods, and your rights.

Personal data refers to any information relating to an identified or identifiable individual. Data processing includes any operation performed on personal data, such as collection, storage, use, modification, communication, or deletion. We collect and process personal data in accordance with legal and contractual obligations, respecting transparency and the principles of proportionality and purpose.

## **3. Purpose of Collecting and Processing Personal Data**

We process personal data that is necessary to ensure the continuity, security, and reliability of our services. This includes, but is not limited to:

- Managing and administering contractual relationships with clients, employees, suppliers, etc.;
- Maintaining contact and communication in the provision of services;
- Ensuring security, legal compliance, and the exercise of legal claims.

## **4. What Personal Data Do We Process?**

### **4.1 General Contact and Basic Data**

Depending on the nature of the service and the client relationship, we collect different types of personal data. As a minimum, we process the following data for all contacts, contractual partners, and clients:

- Name, email address, and, where applicable, gender, postal address, phone number, title, date of birth, nationality, profession, employer details;
- Electronic and written correspondence;
- Any message or inquiry you send to us.

### **4.2 Data Related to Contract Management**

For managing and administering mandates, we process the following personal data:

- General contact and basic data (see section 4.1);
- Financial and business information for legal entities and individuals involved in contractual relationships;
- Information required for risk assessments, such as debt registry excerpts and financial standing.

### **4.3 Data from Direct Communication**

We may process personal data that comes from direct communication such as phone calls, emails, video conferences, or other online meetings. This may include:

- General contact information (see section 4.1);
- Data related to the communication such as IP address, communication duration, and content.

### **4.4 Website Data and Cookies**

Our website uses cookies to ensure proper functionality, enhance security, and improve user experience. We may collect data like the user's IP address, browser type, operating system, and interaction with the site for analytical purposes. We use systems like Google Analytics to track site usage. Users can control cookie preferences through our consent management tool.

## **5. Data Collection, Retention, and Security Measures**

### **5.1 Data Collection**

We primarily obtain personal data directly from you when you use our services. In certain cases, data may come from third-party sources such as public records, authorities, or your employer.

### **5.2 Data Retention**

We retain personal data only for as long as necessary to fulfill the purposes for which it was collected or to comply with legal obligations. Once this period has expired, the data is deleted or anonymized.

### **5.3 Data Security**

We implement appropriate technical and organizational measures to protect your personal data from unauthorized access or misuse. These include encryption, network security, access restrictions, and regular security audits.

## **6. Data Sharing and Transfers**

We may share personal data with third parties if it is necessary for service provision, legal compliance, or in the pursuit of legitimate business interests. These third parties may include service providers (e.g., IT companies, legal advisors), authorities, or institutions.

Data transfers may occur outside of Switzerland or the EU/EEA. If this is the case, we ensure appropriate safeguards are in place, such as standard contractual clauses or other protective measures.

## **7. Your Rights**

You have the right to request access to the personal data we process, along with information about its origin, recipients, and purpose. You can also request the correction, blocking, deletion, or transfer of your data. In certain cases, legal retention obligations may prevent the immediate deletion of data.

To exercise your rights, you can contact us at [middle@swissarb.com](mailto:middle@swissarb.com). Please include a copy of your identification document for verification purposes.

## **8. Final Provisions**

### **8.1 Responsible Entity and Contact Information**

Swissarb SA is responsible for data processing under this policy. For any data protection inquiries, please contact us at [middle@swissarb.com](mailto:middle@swissarb.com).

### **8.2 Updates to this Privacy Policy**

We reserve the right to modify this privacy policy at any time. The latest version will be available on our website. This policy was last updated on October 2024.