

DATA PROTECTION DIRECTIVE

INTRODUCTION

The present internal directive (the "Directive") is adopted by the Board of Directors (the "BoD") of TBH Global Family Office SA (the "Company") pursuant to:

- The Articles of Association (Statuts);
- The Organizational Regulations (Règlement d'Organisation);
- The Federal Act on Data Protection (FADP) and its Ordinance (OPDo);
- All relevant FINMA ordinances, circulars and directives.

Our Commitment

At TBH Global Family Office SA we value the privacy and security of Personal Data. The Directive outlines our commitment to complying with the Swiss Federal Act on Data Protection ("FADP") and its regulations. We strive to ensure that Personal Data processed within our operations is handled with care and in accordance with the law. This Directive applies to all Employees (including Management and Board members) working on behalf of our company.

Definitions

- **Personal Data:** Any information relating to an identified or identifiable individual.
- **Data Subject:** The individual to whom the Personal Data relates.
- **Processing:** Any operation or set of operations performed on Personal Data, such as collection, recording, storage, adaptation, or disclosure.

SCOPE

This Directive applies to all Personal Data collected, stored, processed, or transmitted by our company, regardless of the format or medium. This Directive has been designed to address the specific requirements applicable to our business activities.

Roles and Responsibilities

- **Data Protection Officer (DPO):** The individual who is responsible for overseeing data protection and ensuring compliance with relevant regulations.
- **Data Controllers:** Individuals or departments responsible for determining the purposes and means of processing Personal Data within our company.
- **Data Processors:** Individuals or entities who process Personal Data on behalf of our company under the instructions of the data controllers.

DATA PROTECTION PRINCIPLES

Lawfulness, Fairness, and Transparency

- We process Personal Data lawfully, fairly, and in a transparent manner, always complying with the applicable regulations.
- We provide clear and concise information to Data Subjects about the purposes and legal basis for processing their Personal Data.

Purpose Limitation

- Where required, we seek and obtain consent in an explicit, free, informed and specific manner.
- We collect Personal Data only for specific, explicit, and legitimate purposes directly related to our business activities.
- We limit our processing of Personal Data to what is required to fulfil our legal and regulatory obligations, except with the explicit consent of the data owner or in cases provided for by law.

Data Minimization

- We only collect and retain Personal Data that is necessary for the performance of our business activities and to fulfil our legal and regulatory obligations.
- We review the Personal Data we collect and take measures to minimize the collection of unnecessary or excessive data.

Accuracy

- We take reasonable steps to ensure that Personal Data is accurate, up to date, and relevant.
- We rectify or erase inaccurate or outdated Personal Data.

Data Security

- We see to it that Personal Data is protected against unauthorised access, disclosure, alteration or destruction.
- We instruct our employees to take all appropriate measures to ensure the security of Personal Data, including an obligation to keep logins and passwords confidential.

Storage Limitation

- We retain Personal Data only for as long as necessary to fulfill the purposes for which it was collected, as required by relevant regulatory requirements.
- Retention period is limited to 10 years, unless otherwise required by applicable legal and regulatory obligations.
- We permanently delete Personal Data once the retention period has expired.

Disclosure

- We only disclose Personal Data to authorised persons and in compliance with legal obligations.

Confidentiality and Integrity

- We implement and maintain appropriate technical and organizational measures to ensure the confidentiality, integrity, and security of Personal Data, in accordance with regulatory requirements.
- Access to Personal Data is restricted to authorized individuals on a need-to-know basis, and we employ security measures to prevent unauthorized access, disclosure, or alteration.
- Whenever an employee leaves the Company or changes position, we revoke or modify their access to Personal Data accordingly.

Accountability

- We maintain comprehensive records of our processing activities (Personal Data Register), including, when relevant, data flows, data protection impact assessments, and relevant policies and procedures, to demonstrate compliance with data protection laws and regulations.
- We regularly review and update our data protection practices to ensure ongoing compliance with regulatory requirements.

DATA SUBJECT RIGHTS

We acknowledge and respect the rights of Data Subjects as provided under the FADP and other applicable data protection laws. We strive to acknowledge requests from Data Subjects concerning their rights to Personal Data promptly and within the time limits laid down by law. Data Subjects have the following rights and can exercise them by contacting our Data Protection Officer:

- Right to be informed about the processing of their Personal Data.
- Right to access their Personal Data and obtain a copy of it.
- Right to rectify inaccurate or incomplete Personal Data.
- Right to erasure ("right to be forgotten") under certain circumstances (if not forbidden by law).
- Right to restrict processing in specific situations.
- Right to data portability, where applicable.
- Right to object to the processing of Personal Data, including automated decision-making.
- Right not to be subject to a decision based solely on automated processing, including profiling.

DATA TRANSFER AND THIRD-PARTY PROCESSORS

International Data Transfers

- We ensure that any international transfer of Personal Data complies with the requirements of the FADP and any applicable regulatory framework.
- We inform Data Subjects about international data transfers and the appropriate safeguards implemented.

Third-Party Processors

- We engage only reputed third-party processors that are known to implement of appropriate technical and organizational measures to protect Personal Data or provide sufficient guarantees in this regard.
- We establish and maintain data processing agreements or contracts with third-party processors, outlining their responsibilities and obligations regarding data protection.

BREACH NOTIFICATION

In the unlikely event of a Personal Data breach, we will promptly assess the impact and take appropriate measures to mitigate and address the breach, following applicable regulatory requirements. We will notify affected Data Subjects and relevant authorities as required by law.

TRAINING AND AWARENESS

We provide training programs to our employees to ensure their understanding and compliance with the Directive and regulatory requirements.

DIRECTIVE REVIEW

This Directive is reviewed as appropriate to ensure its ongoing relevance and compliance with evolving legal and regulatory obligations. Any necessary updates or revisions will be made, and we will inform our employees and relevant stakeholders accordingly.

CONTACT INFORMATION

For inquiries or concerns regarding this Data Protection Directive, please contact our Data Protection Officer at info@tbh-gfo.com.

ENTRY INTO FORCE

The Directive will come into force on Sept. 1st, 2023.

For the Board of Directors: Yizhak Trabelsi

Date: August 31st, 2023.