CIC CAPITAL (Switzerland) Ltd's privacy policy relating to its investment and financing activities

Status: 16.02.2026

1. What is this privacy policy about?

CIC CAPITAL (Switzerland) Ltd, Löwenstrasse 49, 8001 Zurich, Switzerland (hereinafter also referred to as "**CIC**" or "**we**") processes personal data relating to you or other individuals in different ways and for different purposes.

The term "**personal data**" refers to any information relating to an identified or identifiable natural person, and "**processing**" refers to any operation relating to personal data, such as collection, recording, storage, use, modification, communication, deletion, destruction, etc.

This privacy policy explains our processing of personal data in the context of and/or in connection with our investment and/or financing activities, including the prospecting and evaluation of (potential) opportunities in this area. This privacy policy is provided for information purposes only and does not constitute a contractual document, even if a contract with you refers to it. In addition, for some of our activities, such as our processing of personal data relating to our employees, other privacy policies, notices, and/or statements apply.

Please take the time to read this privacy policy to find out how and why CIC processes your personal data in connection with its investment and/or financing activities, how CIC protects your personal data, and what rights you have in this context.

If you have any questions or would like further information about our processing of personal data, please do not hesitate to contact us (see section 2 below).
We have aligned this privacy policy with the Swiss Federal Act on Data Protection (**FADP**) and the European General Data Protection Regulation (**GDPR**). However, whether and to what extent the GDPR is applicable at all depends on the individual case.

2. Who is responsible for processing your personal data?

For the data processing carried out in accordance with this privacy policy, the following company is the "controller," i.e., the party responsible under the FADP and the GDPR, unless otherwise communicated in specific cases (e.g., in further privacy policies, notices, and/or declarations, on forms, or in contracts):

CIC CAPITAL (Switzerland) Ltd
Löwenstrasse 49
8001 Zurich Switzerland

If you have any questions about our processing of your personal data, please do not hesitate to contact us:

in writing:

CIC CAPITAL (Switzerland) Ltd
Attn: data protection
Löwenstrasse 49
8001 Zurich Switzerland

or

by email:

privacy@cm-equity.ch

3. What personal data do we process?

We process the following categories of personal data, including but not limited to:

— **Basic data**: This is basic information used to prospect and evaluate an investment and/or financing opportunity and, where applicable, to prepare, conclude, implement, execute, and monitor documents and/or contracts relating thereto. We receive and process basic data for evaluation and, where applicable, for preparing or concluding a contract, or when you register for or participate in a corporate event.

— **Career history and training data**: We receive and process information about career history, qualifications, and training in order to prospect and evaluate investment and/or financing opportunities and, where applicable, prepare, conclude, implement, execute, and monitor documents and/or contracts, relating thereto.

— **Financial data:** We receive and process financial information and bank details in order to prospect and evaluate investment and/or financing opportunities and, where applicable, prepare, conclude, implement, execute, and monitor documents and/or contracts relating thereto.

— **Contractual data**: We receive and process information relating to the conclusion or execution of a contract concerning investments and/or financing, for example information on contracts or contractual obligations performed or to be performed, , as well as data from the period prior to the conclusion of a contract. This also includes information on the conclusion of a contract itself), as well as information necessary for the performance and administration of the contract and, more generally, the monitoring and administration of our shareholdings and investments.

— **Compliance data:** We receive and process information to comply with legal requirements, particularly in relation to anti-money laundering (including politically exposed persons), counter-terrorist financing and anti-corruption, sanctions monitoring and comparable controls in relation to (potential) investment or financing opportunities, including in relation to corporate bodies, members of management, shareholders, and beneficial owners. To this end, we collect information, including but not limited to

information from relevant databases and publicly available sources, as well as from other third parties and/or yourself. This personal data may also include sensitive personal data.

— **Communication data:** We receive and process information related to our communication, for example when you contact us via a contact form or other means of communication.

— **Marketing data:** We also process information related to marketing.

— **Image and sound recording**: We may record, if required with your prior consent, photos, videos, and speech, for example when you participate in an event, during video recordings for security and evidence and/or documentation purposes, training, or quality assurance.

— **Other data**: We may process other personal data that we cannot foresee at this stage. We will inform you separately about the processing of such personal data whenever possible.

We process most personal data only if you voluntarily provide it to us. However, we must process certain personal data in the course of our business activities, including sensitive personal data such as personal data relating to criminal or administrative sanctions.

If you provide us with personal data concerning other persons, such as members of your corporate bodies, members of your management, your shareholders, your beneficial owners, your employees, your co-contractors, your business partners, your service providers, your contact persons (or members of corporate bodies, members of management, shareholders, beneficial owners, employees, co-contractors, business partners, service providers, contact persons of other individuals/legal entities), we assume that you are authorized to do so and that this personal data is accurate. Subject to any confidentiality obligation to which you are subject by law or otherwise (e.g., in an NDA, LOI, convertible loan agreement, shareholder agreement, investment agreement, etc.), please ensure that these third parties are informed of our processing of personal data by providing them with a copy of this privacy policy. For all intents and purposes, it is explicitly stated that a confidentiality obligation prevails and takes precedence over your obligation to inform these third parties of our processing of their personal data.

4. On what basis do we process personal data?

Insofar as applicable law requires a legal basis for our processing, we process personal data for the purposes mentioned below in section 5 on the basis of one or more of the following legal grounds. If the GDPR applies, the relevant provisions can be found in Articles 6 and 9 of the GDPR.

— processing is necessary for the performance of a contract or for the implementation of pre-contractual measures;

— processing is necessary for compliance with a legal obligation;

— processing is based on consent; and/or

— processing is necessary for the purposes of legitimate interests, for example, the preparation, organization, execution, control, and monitoring of our commercial activities, including the prospecting and evaluation of investment and/or financing opportunities, marketing; compliance with legal requirements and our internal rules, the prevention of crimes and offenses and investigations relating to crimes and other misdemeanors, handling complaints and claims against us, the participation in legal proceedings and, in general, the establishment, exercise, or defense of legal rights; our economic activity; the management of the company; the sale or purchase of businesses, companies or parts of companies and other transactions relating to company law and/or financing, etc.

5. For what purposes do we process personal data?

We process personal data in connection with and for the purposes of all our activities directly or indirectly related to our investments and/or financing, in particular for the following purposes:

— To prospect and evaluate investment and/or financing opportunities and, where applicable, to prepare, conclude, implement, and execute documents and/or contracts relating thereto and to ensure the monitoring, the controlling, and the exiting of investments and/or financing, and to adapt the related documents and/or contracts

— **Communication with you**

— **Publications and marketing**

— **Documentation**

— **Statistical evaluations**

— **Compliance, investigations, and legal proceedings**

— **Planning, control, and execution of corporate transactions**

— **Other purposes:** We will inform you separately about other purposes, to the extent that this is possible and we are required to inform you.

6. To whom do we disclose your personal data?

We may disclose personal data for the purposes described above in section 5 to recipients belonging to the following categories:

— **Affiliated Companies* and Related Entities**** (to the extent necessary and/or useful for the realization, management, implementation, and monitoring of investments and/or financing by the data controller and/or Affiliated Companies).

— **Commercial intelligence agencies and providers of databases on sanctions and other**

matters (to the extent necessary and/or useful in the context of a request for information and/or verification).

— **Partners** (such as co-investors/co-financiers and/or depository banks).

— **Service providers and consulting firms** (such as providers of IT services, personnel administration services, maintenance and support services, lawyers, notaries, etc.).

— **Authorities, official bodies and services and/or other parties to legal proceedings** (such as courts, law enforcement authorities, including criminal and/or administrative prosecution authorities, responding to requests for information from competent authorities or participating in investigations and proceedings; counterparties and other parties such as experts and witnesses in proceedings).

— **Parties interested in acquiring businesses, companies, assets, or other transactions under corporate law.**

***Affiliated Company:** refers to any person or entity that, directly or indirectly through one or more intermediaries, Controls or is Controlled by the designated person or entity, or is under common Control with it, including persons or entities considered to be related within the meaning of Article 678 CO.

****Related Entity:** refers to any person or entity that, directly or indirectly through one or more intermediaries, is Controlled by the designated person or entity or is under common Control with it, including persons or entities considered to be related within the meaning of Article 678 CO.

Control/Controlling: means the direct or indirect power to give instructions to the management body of an entity or to direct a person or entity, whether through voting rights, an agreement or otherwise.

7. Is personal data also disclosed abroad?

We process personal data primarily in Switzerland, Germany, Belgium, France, and Canada, but depending on the circumstances—for example, through service providers or in the event of legal proceedings abroad—potentially in any country within the European Economic Area and in the United States of America.

If a recipient of personal data (see section 6 above) is located in a country that does not have adequate personal data protection, we contractually oblige the recipient to comply with a sufficient level of personal data protection (we use the revised standard contractual clauses of the European Commission for this purpose, which can be found at https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX%3A32021D0914, with the necessary adaptations for Switzerland where applicable), insofar as the recipient is not already subject to a set of rules recognized by law to ensure the protection of personal data.

In certain cases, we may also disclose personal data to a recipient in a country that does not have adequate personal data protection, without entering into a specific contract, if an exception provided for by law applies: if you have consented to the disclosure; if the disclosure is directly related to the conclusion or performance of a contract between you and us or between us and our co-contractor but in your interest; if the disclosure is necessary for the establishment, exercise, or defense of rights before a court or other competent foreign authority; if the disclosure is necessary for overriding public interests or for the protection of the life or physical integrity of the person or a third party; if the personal data is publicly available and the person has not expressly objected to the processing; or if the personal data comes from a register provided for by law that is accessible to the public or to any person with a legitimate interest, provided that the legal conditions for consultation in the specific case are met.

8. How long do we store personal data?

We generally retain personal data for the duration of the contracts and/or the relationship in question and for 15 years after their termination. Exceptions apply if, in a particular case, there are longer legal retention obligations (including regulatory obligations), if retention is necessary for evidentiary reasons, to assert our rights and/or defend our interests, or if there is another valid ground for exception under applicable law. In addition, exceptions also apply if earlier deletion is indicated (e.g., because we no longer need the personal data or are required to delete it). Business documents are retained for as long as we have a legitimate interest in retaining them (e.g., to provide evidence in the event of a claim, to document compliance with certain legal or other requirements, for non-personal analysis) or if we are legally required to do so.

9. How do we protect personal data?

We take appropriate measures to protect the confidentiality, integrity, and availability of your personal data, to protect it from unauthorized or unlawful processing, and from the risks of loss, unwanted changes, and unauthorized disclosure or access. However, certain security risks always remain.

10. What are your rights regarding personal data?

You have certain rights regarding your personal data that we process. However, these rights may be subject to certain conditions or restrictions — we will inform you accordingly, if applicable, if you wish to exercise such a right against us:

— You have the right to access your personal data at any time. You also have the right to request the correction or deletion of personal data concerning you, as well as to object to its processing or request its restriction. In certain cases, you also have the right to receive certain personal data in a structured, common, and machine-readable format. To do so, please contact the person mentioned in section 2 above. As a rule, we will need to verify your identity (e.g., by means of a copy of your ID card).

— You have the right to lodge a complaint with the competent data protection authority (for Switzerland: the Federal Data Protection and Information Commissioner [FDPIC] [https://www.edoeb.admin.ch/en]).

If the processing of personal data is based on your consent, you may revoke this consent at any time. Such revocation only has effect for the future, and we reserve the right to continue processing personal data on another basis in the event of revocation.

11. Order of priority

In the event of a conflict and/or incompatibility between a provision of this privacy policy and a contractual provision (e.g., in a shareholders' agreement, investment agreement, and/or convertible loan agreement) or in the event of a conflict and/or incompatibility between a provision of this privacy policy and a regulatory obligation to which we are subject, the contractual provision or regulatory obligation shall prevail over the provision of this privacy policy.

12. How can we change this privacy policy?

This personal data protection policy is not part of a contract. We may update it at any time.