Privacy Policy

With this Privacy Policy we, Oyat Advisors GmbH (hereinafter «we» or «us»), describe how we collect and process personal data. This Privacy Policy is not necessarily a comprehensive description of our data processing, and it is possible that other data protection statement are applicable to specific circumstances.

In this Privacy Policy, the term «personal data» refers to any information that identifies or could reasonably be used to identify any natural person.

If you provide us with personal data of other individuals (such as family members or work colleagues), please ensure that those individuals are aware of this Privacy Policy. Only provide us with their data if you are authorized to do so and ensure that the personal data provided is accurate.

This Privacy Policy is based on the revised Swiss Federal Act on Data Protection («FADP»), in force since 1 September 2023, and, where applicable, the EU General Data Protection Regulation («GDPR»). However, the application of these laws depends on each individual case.

A. Data Controller

The «controller» of data processing as described in this privacy policy (i.e. the responsible person) is:

Oyat Advisors GmbH
Gotthardstrasse 51
8002 Zürich, Switzerland
info@oyat.com
www.oyat.com

If you have any questions regarding how your personal data is processed or any other data protection concerns, you can contact us using the above-mentioned contact details.

B. Purpose of Data Processing and Legal Bases

We primarily use collected data to enter into and fulfill contracts with our clients and business partners, particularly in relation to providing financial services to our clients and procuring products and services from our suppliers and subcontractors. We also process personal data to comply with domestic and foreign legal obligations.

Additionally, in accordance with the applicable law and where appropriate, we may process personal data for the following purposes, which are in our (or, where applicable, third parties') legitimate interest:

- Providing and developing our products, services and websites, apps and other platforms in which we are involved.
- Communication with third parties and handling their requests (e.g., job applications, media inquiries).
- Advertisement and marketing (including event organization), provided that you have not objected to the use of your data for this purpose (if you are part of our client base and you receive advertisement, you may object at any time, and we will add you to a blacklist to stop further advertising mailings). We send our quarterly commentary by email only to persons who have subscribed and confirmed that they are qualified investors; each mailing contains a link to unsubscribe.

- Asserting legal claims and defending against legal disputes and official proceedings.
- Prevention and investigation of criminal offenses and other misconduct.
- Ensuring the smooth operation of our IT systems, websites, apps, and other devices.
- Acquisition and sale of business divisions, companies, or parts of companies, and other corporate transactions involving the transfer of personal data. This includes measures for business management and compliance with legal and regulatory obligations, as well as internal company regulations.

If you have provided us with your consent to process your personal data for specific purposes (for example when registering to receive newsletters), we will process your personal data within the scope of and based on this consent, unless we have another legal basis if one is required. You have the right to withdraw your consent at any time, but this does not affect the processing of data that occurred prior to the withdrawal.

C. Collection and Processing of Personal Data

We primarily process personal data that we obtain from our clients, business partners, and individuals in the context of our business relationships. Additionally, we collect data from users when operating our websites, apps, and other applications.

Where permitted, we may acquire certain personal data from publicly accessible sources (e.g., debt registers, land registries, commercial registers, press, internet) or receive such information from affiliated companies of Oyat Advisors GmbH, authorities, or other third parties such as distribution agents or custodian banks. In addition to the data provided directly by you, the categories of data we receive from third parties include, but are not limited to: information from public registers, data received in administrative or court proceedings, information related to your professional role and activities (e.g., to conclude and fulfill contracts with your employer), information from correspondence and discussions with third parties, information provided by individuals associated with you (family, consultants, legal representatives, etc.) to conclude or process contracts with your involvement (e.g. powers of attorney), information regarding legal regulations such as anti-money laundering, bank details, information about you from media or internet sources (in specific cases, e.g. job applications, media reviews, marketing/sales, etc.), your address, interests and other socio-demographic data (for marketing purposes), and data related to your use of our websites (e.g., IP address, MAC address of your smartphone or computer, device and settings information, cookies, date and time of visit, accessed content and sites, used applications, referring website, localization data).In principle, we retain this data only as long as necessary for the completion of the processing purpose. However, this retention period may be extended if necessary for evidentiary reasons or to comply with legal or contractual obligations.

D. Cookies / Tracking and other relevant Information regarding the Use of our Website

Technical Data

When you visit our website, we collect and evaluate user-specific data (e.g. IP address, web browser, operating system) and technical data (such as URLs of accessed pages, execution of search queries) in an anonymous manner.

The mentioned data is collected and processed for system security, stability, error and performance analysis, as well as for internal statistical purposes. This allows us to optimize our website.

For subscribing to our content or when submitting a contact form/customer login, we process the necessary data to provide the requested service. Depending on the specific service, the following data

may be processed: email address, first name, last name, salutation, full address, subject matter, type of investor and domicile, invested status, confirmation of qualified-investor status and message.

If you have given us your consent to process your personal data for specific purposes (for example, subscribing to a newsletter or making an inquiry), we will process your personal data within the scope of and based on this consent, unless we have another legal basis, if required. You have the right to withdraw your consent at any time, but this does not affect the processing of data that occurred prior to the withdrawal.

Communication Data

If you contact us via the contact form, e-mail, telephone, chat, letter, or any other means of communication, we collect the exchanged data between you and us, including your contact details and relevant communication details. If we record or listen to telephone conversations or video conferences, e.g. for training and quality assurance purposes, we will inform you of this practice. Any recordings will be made and used in accordance with our internal guidelines and applicable laws.

Generally, we retain this data for 12 months from the last interaction with you or as long as necessary for the completion of the needed processing. However, this retention period may be extended if necessary for evidentiary reasons, to comply with legal or contractual requirements or for technical reasons.

Cookies and Their Use

We use «Cookies» in some cases to customize our offering to better suit your needs. Cookies are small files that are stored on your computer or mobile device when you visit or use our websites. These cookies cannot perform any operations on their own. They save specific settings through your browser and collect data related to your interaction with the website. When a cookie is enabled, it is assigned an identification number that identifies your browser and allows the information stored in the cookie to be utilized. There are two primary types of cookies: temporary cookies and permanent cookies. We use temporary cookies, which are automatically deleted from your mobile device or computer at the end of the browser session. We also use permanent cookies to save user settings (e.g. language, auto-login), understand how you use our services and content, and show you personalized offers and advertisements (including on websites of other companies; please note that such companies will not receive your identity from us; they will only know that the same user who visited their website had previously visited a specific website). Permanent cookies remain saved on your computer or mobile device for an extended period but are automatically disabled after a predetermined time.

Despite the above, you may configure your browser settings in a way that it rejects cookies, only saves them for one session or deletes them prematurely. Most browsers are preset to accept cookies. However, if you choose to block cookies, certain functions (such as, e.g., language settings, shopping basket, ordering processes) are no longer available to you.

Oyat Advisors GmbH allows partner companies that provide services for Oyat Advisors GmbH which are integrated into our website to save cookies, as long as it is technically necessary and the use of cookies is proportionate. Oyat Advisors has no control over how cookies are used outside our website.

When you first visit our website, a cookie banner allows you to accept or decline cookies that are not strictly necessary (e.g. analytics cookies). We only set such cookies if you accept them. You can change your choice at any time via the cookie settings on our website or in your browser settings.

Google Analytics and Similar Services

We may use Google Analytics or similar services on our website with the objective of designing and continuously optimizing our website to meet your needs. These services are provided by third parties, which may be located in any country worldwide (in the case of Google Analytics Google Ireland Ltd. (located in Ireland), Google Ireland relies on Google LLC (located in the United States) as its sub-processor (both «Google»), www.google.com). These services allow us to measure and evaluate the usage of our website on an anonymized basis. For this purpose, permanent cookies are used, which are set by the service provider. We have configured the service in a way that ensures IP addresses of visitors are truncated by Google within Europe before being transmitted to the United States, making it impossible to trace them back. We have also disabled the "Data sharing" and "Signals" options. Although we can assume that the information we share with Google does not constitute personal data for Google, it may be possible that Google may be able to draw conclusions about the identity of visitors based on the data collected, create personal profiles and link this data with the Google accounts of these individuals for its own purposes. If you have registered with the service provider, the service provider will also have knowledge of your identity. In this case, the processing of your personal data by the service provider will be conducted in accordance with its own data protection regulations. The service provider only provides us with data regarding the usage of the respective website, and no personal information about you is shared.

The information generated by cookies regarding your usage of our website is transmitted to the servers of the service providers, where it is stored and processed on our behalf. In addition to the previously mentioned data, we may also receive the following information:

- The navigation path followed by a visitor on the website.
- The time spent on the website or subpage.
- The subpage from which you leave the website.
- The country, region or town / city from which access is made.
- The end device (type, version, color depth, resolution, width, and height of the browser window).
- Whether the visitor is a new or returning user.

The tools, programs, and instruments we may use in the context of analyzing web behavior include Google Analytics, Google Tag Manager, Google Ads, YouTube (embedded videos), Userlike and Mailchimp. Our website is hosted by Wix.com Ltd. (Israel), and we send our quarterly commentary by email via Mailchimp (Intuit Inc., USA).

Information (including your IP address) generated by the cookie when using the aforementioned Google Analytics tool, is transmitted to a Google server in the USA. Google will use this information to evaluate website usage and compile reports on website activities for us as the website operator, as well as providing other services relating to website and internet use. Google may also transmit this information to third parties if required by law or if third parties process the data on Google's behalf. Google will never associate your IP address with other Google data. You can prevent the installation of cookies by adjusting your browser settings. However, if you do so, you may not be able to use all the features on the website. Google Analytics is only activated if you accept analytics cookies in our cookie banner.

Social Media Plug-ins:

In addition, we may use plug-ins from social networks such as Facebook, Twitter, YouTube, Pinterest or Instagram on our website. These plug-ins are identifiable by their respective symbols. By default, we have configured these elements to be disabled. If you choose to activate them (by clicking on them), the operators of the respective social networks may collect information that you are visiting our website, which page you are accessing from, and may use this information for their own purposes. The processing of your personal data in this context is the responsibility of the respective operator and is conducted in accordance with their data protection regulations. We do not receive any information about you from the respective operator.

E. Sharing Data with Third Parties and Transfer of Data Abroad

In the context of our business activities and in line with the purposes of the data processing outlined above, we may transfer data to third parties, insofar as such a transfer is permitted and deemed appropriate for them to process the data on our behalf or for their own purposes. In particular, the following categories of recipients may be concerned:

- Our service providers (e.g. Risk Management & Compliance, IT-Provider, CRM-System, website hosting (Wix), email newsletter (Mailchimp))
- Domestic and foreign authorities, official bodies and courts
- Other parties involved in potential or ongoing legal proceedings

Certain Recipients are located within Switzerland, but others may be located in any country worldwide. In particular, you must anticipate your data to be transmitted to any country where our service providers are located (such as Microsoft, Wix and Mailchimp).

If a recipient is located in a country without adequate statutory data protection, we require the recipient to commit to data protection compliance (for this purpose, we use the European Commission's standard contractual clauses with the adaptations required under Swiss law, available here: https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj; for U.S. recipients certified under the Swiss-U.S. Data Privacy Framework, we may rely on that framework instead), unless the recipient is subject to a legally accepted set of rules to ensure data protection, or unless we cannot rely on an exception. An exception may apply for example in case of legal proceedings abroad, overriding public interest, contractual disclosure requirements, your consent, or if data has been publicly available and you have not objected to its processing.

F. Duration of data storage

Your data, which includes personal data, will be processed and stored only for as long as necessary to fulfil our contractual and legal obligations or for the purposes stated in the data processing activities. This may include the entire duration of the business relationship and beyond, based on legal retention requirements and documentation obligations. It is possible that personal data will be retained for the time in which claims can be asserted against our company and insofar as we are otherwise legally obliged to do so, or if legitimate business interests require it (e.g. for evidence and documentation purposes). Once your personal data is no longer required for the above-mentioned purposes, it will be erased or anonymized, to the extent possible. For operational data (e.g. system protocols, logs), shorter retention periods may apply.

G. Data Security

We have taken appropriate technical and organizational security measures to protect your personal data against unauthorized access and misuse. These measures include issuing instructions, training, IT and

network security solutions, access controls and restrictions, encrypting passwords, data storage devices and transmissions, and controls.

We cannot guarantee the security of data transmission over the internet. When transmitting data by email, there is a certain risk of access by third parties.

H. Your Rights

In accordance with and as far as provided by applicable law, you have the right to access, rectification and erasure of your personal data, the right to restriction of processing or to object to our data processing, in particular for direct marketing purposes, for profiling carried out for direct marketing purposes and for other legitimate interests in processing in addition to right to receive certain personal data for transfer to another controller (data portability). Please note, however, that we reserve the right to enforce statutory restrictions on our part, for example if we are obliged to retain or process certain data or if we have an overriding interest (insofar as we may invoke such interests) or need the data for asserting claims.

We have already informed you of the possibility to object/withdraw consent at any time. Please be aware that exercising your rights may have implications for your contractual obligations and this may result in consequences such as premature contract termination or associated costs. If this is the case, we will inform you in advance unless it has already been contractually agreed upon.

In general, exercising these rights requires that you are able to prove your identity (e.g., by a copy of identification documents where your identity is not evident otherwise or can be verified in another way). In order to assert these rights, please contact us via the details provided above.

In addition, every data subject has the right to enforce his/her rights in court or to lodge a complaint with the competent data protection authority. The competent data protection authority of Switzerland is the Federal Data Protection and Information Commissioner (https://www.edoeb.admin.ch).

I. Profiling and Automated Individual Decision-Making

We may partially process your personal data automatically with the aim of evaluating certain personal aspects (profiling). In particular, profiling allows us to inform and advise you about products possibly relevant for you more accurately. For this purpose, we may use evaluation tools that enable us to communicate with you and advertise you as required, including market and opinion research.

While establishing and carrying out a business relationship, we generally do not use any fully automated individual decision-making (such as pursuant to article 22 GDPR). Should we use such procedures in certain cases, we will inform you separately and advise you of your relevant rights if required by law.

J. Changes to this Privacy Policy

We may amend this Privacy Policy at any time without prior notice. The current version published on our website shall apply. If the Privacy Policy is part of an agreement with you, we will notify you via e-mail or other appropriate means in case of an amendment.

Last updated: November 2026.