



Privacy Policy

Richfox Capital Investment Management AG (the **Company**) is committed to protecting the privacy and Personal Data (*as defined below*) of individuals whose Personal Data is processed in connection with the Company's business activities.

This Privacy Policy explains how and for what purposes the Company collects, uses, discloses and otherwise processes Personal Data, and sets out the rights available to individuals in relation to their Personal Data.

The Company processes Personal Data in accordance with applicable data protection laws and regulations, including, where applicable, the Swiss Federal Act on Data Protection and the EU General Data Protection Regulation, together with their respective implementing regulations and ordinances.

This Privacy Policy applies to Personal Data processed by the Company in connection with its business activities and describes the principles and safeguards we apply to such processing.

1. Definitions

In this Privacy Policy,

AML/KYC Data means Personal Data collected and processed for anti-money laundering (**AML**) and know-your-customer (**KYC**) purposes, where applicable. This may include identification documents, proofs of address, account statements, criminal records or extracts, CVs, and information relating to source of funds and wealth information.

Personal Data means any information relating to an identified or identifiable natural person. A natural person may be identifiable directly or indirectly, for example, by reference to a name, identification number, location data, online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

Website means the website operated by the Company, currently available at www.richfox.com.

2. General Principles

The Company is committed to processing Personal Data responsibly, transparently and in accordance with applicable data protection laws and regulations. In doing so, we apply the following principles:

- Lawfulness and transparency: We process Personal Data only where there is a lawful basis for doing so and provide appropriate information about how and why Personal Data is processed.
- Purpose limitation: We collect and use Personal Data for specific, legitimate purposes and do not process it in ways that are incompatible with those purposes.
- Data minimisation: We seek to collect and process only the Personal Data that is necessary and relevant for the purposes for which it is processed.
- Accuracy: We take reasonable steps to ensure that Personal Data is accurate and, where necessary, kept up to date.
- Retention: We retain Personal Data only for as long as necessary for the relevant purposes, or as required by applicable legal, regulatory or contractual obligations.

- Security and confidentiality: We take appropriate technical and organisational measures to protect Personal Data against unauthorised access, loss, misuse, alteration or disclosure.
- Accountability: We maintain appropriate policies, procedures and controls to support compliance with applicable data protection requirements and to demonstrate, where required, that Personal Data is processed in accordance with those requirements.

3. Privacy Policy

The Company collects and processes Personal Data that is necessary to provide its services, manage business relationships, respond to enquiries and comply with applicable legal and regulatory requirements.

Depending on the nature of the relationship with the Company, Personal Data may include:

- identification and contact details, including but not limited to name, date of birth, nationality, address, telephone number and email address;
- professional status information, including CVs and employment details;
- AML/KYC and due diligence information, including identification documents, proof of address, financial information (such as source of funds and wealth, bank references and account statements) and, where applicable, information relating to criminal records; and
- technical information relating to the use of the Website, including internet protocol (IP) addresses, browser and device information.

Where an individual contacts the Company through the Website, the Company may also process information provided voluntarily through the relevant contact form or other communication.

We collect Personal Data:

- directly from you, including through communications, applications, website or premises visits, and contractual relationships; and
- from third parties and public sources, including contractual counterparties, public registers, authorities, sanction lists, and other publicly available sources.

3.1. Purposes of Processing

The Company processes Personal Data for:

- providing and managing the Company's services and business relationships;
- responding to enquiries and communications;
- conducting AML/KYC and due diligence procedures;
- complying with legal and regulatory obligations;
- protecting the Company's systems, Website and legitimate interests; and
- where permitted, communicating information concerning the Company's services and activities.

The Company processes Personal Data only where there is an applicable legal basis for such processing.

3.2. International Transfers

Personal Data may be transferred to or accessed from countries outside Switzerland or the European Economic Area in connection with the Company's business activities. Any such transfer shall only be made where the explicit consent of the relevant data subject has been obtained, or where the transfer is explicitly requested or required by a competent regulatory or governmental authority, in each case subject to applicable data protection laws and requirements.

Where required by applicable law, the Company will implement appropriate safeguards for such transfers, including recognised contractual safeguards or other legally permitted mechanisms.

3.3. Disclosure to Third Parties

The Company may disclose Personal Data to service providers, professional advisers, financial institutions, regulators, public authorities and other third parties where necessary to provide its services, comply with legal or regulatory obligations or protect the Company's legitimate interests.

The Company does not sell Personal Data.

Where third-party service providers process Personal Data on behalf of the Company, the Company takes appropriate measures to ensure that the data is handled in accordance with applicable data protection requirements.

The Company may use or share aggregated or anonymised information about the use of the Website for analytical, statistical, marketing or other legitimate business purposes, provided that such information does not identify individuals.

3.4. Data Security and Retention

The Company takes appropriate technical and organisational measures to protect Personal Data against unauthorised access, loss, misuse, alteration or disclosure. These measures include appropriate access controls, encryption, backups and regular security reviews.

Personal Data is retained only for as long as necessary for the relevant purpose or as required by applicable legal, regulatory or contractual obligations. Certain AML/KYC records are subject to statutory retention requirements.

3.5. Data Protection Rights

Subject to applicable law, individuals may have the right to:

- access to their Personal Data;
- correction of inaccurate or incomplete Personal Data;
- deletion or restriction of processing;
- object to certain processing;
- request the portability of Personal Data; and
- withdraw consent where processing is based on consent.

These rights are subject to applicable legal and regulatory restrictions, including requirements to retain certain information.

Requests concerning Personal Data or this Privacy Policy (the **Requests**) should be submitted in writing to:

Richfox Capital Investment Management AG

Talstrasse 83
8001 Zurich
Switzerland

The Company may take reasonable steps to verify the identity of the person making such Request.

3.6. Complaints

Individuals who have concerns regarding the Company's processing of Personal Data are encouraged to contact the Company using the details above or via the contact form on the Website.

Individuals may also lodge a complaint with the competent data protection authority. In Switzerland, the competent authority is the Federal Data Protection and Information Commissioner.

4. Amendments

The Company may amend this Privacy Policy from time to time to reflect changes in its business activities, data processing practices or applicable legal and regulatory requirements.

The updated version will be published on the Website and will take effect upon publication, unless otherwise stated. The date of the latest update will be indicated at the end of this Privacy Policy.

5. Entry into Force

This Privacy Policy enters into force as of 16 September 2026.