

Privacy and personal data protection policy

A. GENERALITIES

Your privacy is important to us.

This document (the "**Policy**") describes the methods we use to collect, store, process and use your personal data.

By providing us with such information and/or by using our Website, you consent to the collection, storage, processing and use of your personal data in accordance with applicable law and the terms and conditions of the Policy.

If you do not agree with the Policy, we kindly ask you not to provide any personal data. If you refuse or withdraw your consent or choose not to provide us with the required personal data, we may not be able to provide you with all or part of our Services.

If you have any questions or comments regarding this Policy or comments to improve its quality, please send us a letter or e-mail (see "**Contact**" section below).

The Policy forms an integral part of SwissLending's General Terms and Conditions of Use ("**GTC**"). Unless otherwise defined below, any term beginning with a capital letter has the meaning given to it in the GTC.

B. COLLECTED DATA

1. Personal data

1.1 Collection

We collect as data controller, with diligence and in strict compliance with data protection rules, the personal data that you freely decide to provide to us (e.g. your name, first name, postal address, e-mail address, telephone number, your status as a professional client/qualified investor). We also collect information about your use of - and behavior on - our Website (e.g., your browsing preferences, statistics about which pages of our Website you visit most, etc.).

Furthermore, when you use, from our Website, services offered by third-party companies (Google+™, etc.), we draw your attention to the fact that said companies may also, through the services they offer, collect personal data about you (your location, your usage preferences, etc.). Therefore, before using these services, we recommend that you carefully read the privacy policies of these third-party companies, for which SwissLending does not assume any responsibility whatsoever.

1.2 Minors

We do not knowingly collect personal data from any minor and we will not use such information if we discover that it has been provided by a minor.

1.3 Use

In general, your personal data is not used for any purpose other than the purpose for which you provided it (ordering Services, requesting support, etc.). Your personal data will only be passed on or communicated to third parties if this is necessary to achieve the purpose for which you provided it.

Personal data may also be disclosed to third parties when required by law or court order or in the event of the sale of our business.

In addition to processing your personal data for the purpose for which you provided it, we reserve the right to use some or all of your personal data for other purposes, such as communicating with you, conducting surveys or recommending to you some or all of the Services that may be of interest to you. You may, at any time, object in whole or in part to the use of your personal data for such purposes (opting-out). To do so, a simple written statement is sufficient (by mail or e-mail, see "Contact" section below).

1.4 Retention

We delete or anonymize your personal data as soon as it is no longer needed for the purposes for which it was collected, unless a longer retention period is required by virtue of a legal duty or the legitimate interest of SwissLending or a third party.

1.5 Security

Personal data is protected by appropriate technical and organizational security measures.

However, in spite of extensive technical and organizational security measures, it is possible that data may be lost or accessed and/or manipulated by unauthorized persons. SwissLending takes the necessary measures in its system; however, your computer is outside the controllable security domain of SwissLending. As a visitor to the Website and user of the Services, you are obliged to inform yourself of the necessary security measures and consequently to take the appropriate measures to protect yourself from any loss or manipulation of your data. SwissLending is not responsible for any damage that may result from the loss or manipulation of your data.

2. Cookies

For the optimization of our Website, we use " **Cookies** ". These are small files that are stored on your data carrier and that store certain settings and data via your Internet browser and exchange them with our system.

You can refuse the installation of Cookies by making the appropriate settings in your browser software. However, we would like to point out that in this case you will no longer be able to use all the functions of our Website.

In principle, no personal data is stored in the Cookies used by SwissLending, except for the Cookie informing us about your status as a professional/qualified investor. With this exception, the Cookies we use cannot be linked to a specific person. When a Cookie is activated, an identification number is assigned to the respective Cookie. It is not possible to link your personal data to this identification number. At no time do we store your name, IP address or any other similar data in such a way that it is possible to establish a connection between the Cookies and you. Through the use of Cookie technology, we only obtain anonymous information that tells us, for example, which pages of our Website have been visited.

3. Tracking

In order to improve our services, we use Google Analytics™ technology provided by the US-based company Google Inc (Google). Google Analytics™ is a web analytics tool that allows us to better understand your behavior on our Website. This tool may use Cookies to collect anonymous information and generate reports on the usage statistics of our Website without you being personally identified by Google. The information generated by these Cookies (including your IP address) may be sent to - and stored on - Google's servers in the United States. Google uses contractual clauses for data transfers outside the European Economic Area (EEA) to countries not covered by an adequacy decision, such as the USA. If you do not want Google Analytics™ to record data about your visits, you can install a browser add-on that allows Google Analytics™ to be disabled.

SwissLending also makes use of the advertising features of Google Analytics™, so advertising Cookies may be used to enable certain features such as remarketing for products like AdWords™ on the Google™ Display Network. More information about how Google uses these Advertising Cookies is available on this page of the Google website. These Cookies can be disabled by changing the settings on the ads or by using the Network Advertising Initiative's tool.

By using our Website, you consent to the processing of data collected about you by Google in accordance with the explanations above and Google's privacy policy, and you acknowledge that SwissLending assumes no liability whatsoever for such processing.

4. Your rights

In order to protect the confidentiality of your data, we may ask you to prove your identity before responding to a request based on your rights.

4.1 Right of access, rectification and deletion

In accordance with the data protection legislation, you have the right to be informed free of charge about the data stored about you and, if these appear to be inaccurate or incomplete, the right to rectify, block or delete them. To do this, simply log into your Account, go to your profile and make the necessary changes. We will delete your personal data, but we will retain certain login data, demographic and statistical information about you and keep an archival copy of your information.

We reserve the right to reject requests that are unreasonably repetitive, require disproportionate technical effort (e.g., to develop a new system or fundamentally change existing practices) or are simply impractical.

In such cases, please address any requests by mail or e-mail (see "Contact" section below).

4.2 Limitation of processing, objection and withdrawal of consent

You have the right to request the restriction of the processing of your personal data if they are processed on too large a scale or to object to the processing of your personal data. You may also withdraw your consent to the processing of your data for the future at any time, without this decision affecting the

processing of your personal data previously undertaken. Please note that in some cases, these rights may conflict with a legal obligation or legitimate interest of SwissLending or a third party or impact your use of the Website.

5. Misuse of the Services

In case of misuse of the Services, in particular in case of fear of punishable acts by you, all data collected, including your personal data and/or Cookies, may be analyzed in order to clarify the situation and, upon duly justified request, be transmitted to the competent official authorities or to the third party concerned by the misuse.

C. CONTACT

Any request in connection with the Policy should be addressed, in a way that makes identification possible and unequivocal, to:

SwissLending SA
Rue du Général-Dufour 20
1204 Genève
Email: contact@swisslending.com

D. MODIFICATIONS

We post all changes to the Policy on the Website. We reserve the right to change this Policy at any time, and encourage you to review it regularly.