

# **Privacy Policy**

Effective Date: 2025-04-01

This Privacy Policy explains how Pillar Capital AG ("Pillar Capital," "we," "us" or "our") processes personal data in connection with our asset management activities and the operation of our website <a href="https://pillarcapital.ch/">https://pillarcapital.ch/</a>.

This Privacy Policy is compliant with the Swiss Federal Act on Data Protection ("DPA").

## Who is responsible for data processing?

Pillar Capital AG Kolinplatz 17, 6300 Zug, Switzerland Email: info@pillarcapital.ch

#### What data do we collect?

Depending on your relationship with Pillar Capital, we may collect the following categories of data:

- Identity data (e.g., name, date of birth, nationality, ID copies)
- Contact details (e.g., address, phone number, email)
- KYC and customer profile data (e.g., occupation, source of funds, investment objectives)
- Transaction and financial data (e.g., portfolio data, payment transactions)
- Technical data (e.g., IP address, browser type, access logs)
- Communication data (e.g., correspondence, support requests)

If you provide us with data about third parties (e.g., authorized representatives or beneficial owners), you must ensure that these persons have been informed about this Privacy Policy.

# For what purposes do we process your data?

We process your personal data for the following purposes:

- Establishing, managing, and terminating business relationships
- Performing asset management and related financial services
- Conducting due diligence (KYC, AML checks)
- Fulfilling legal and regulatory obligations under Swiss financial market regulations (e.g., FinIA, AMLA)
- Risk management and fraud prevention



- Improving our digital services and user experience
- Marketing and communication purposes, where legally permitted
- Ensuring IT security and system integrity

Where we perform automated processing, any fully automated decision is subject to human review.

#### Where does the data come from?

We collect personal data directly from you and from public registers, third-party databases, and other partners where permissible.

### Who do we share your data with?

We disclose your data to:

- Service providers and contractors (e.g., IT providers, KYC service providers)
- Custodian banks and intermediaries
- Regulatory and supervisory authorities (e.g., OSFIN, FINMA)
- External consultants (e.g., auditors, lawyers)

No data is transferred outside Switzerland.

# Data security

We protect your data through:

- Secure access controls
- Firewalls, VPNs and intrusion detection
- Hosting in secure Swiss data centers
- Regular security reviews

#### Data retention

We retain data as long as necessary to fulfill legal obligations or assert legal claims, respecting applicable retention periods.

# Your rights

You have rights to:

- Access your data
- Correct or update your data



- Request deletion
- Restrict processing
- Object to certain processing

Contact info@pillarcapital.ch to exercise these rights.

## Use of cookies and web analytics

Our website may use cookies and analytics tools with IP anonymization. Cookie use can be controlled through browser settings.

### **Amendments**

We may update this Privacy Policy at any time. The latest version will always be available on our website.

### Contact

Pillar Capital AG Kolinplatz 17, 6300 Zug, Switzerland info@pillarcapital.ch