

COOKIES POLICY

"Swiss Merchant Investments SA"

This document contains information about the technology that enables "Swiss Merchant Investments SA" to complete the tasks described below. This technology allow the Data Controller to collect and save information (for example through the use of Cookies) or to use resources (for example by running a script) on the user's device when the latter interacts with the company's website.

For the sake of simplicity, this technology is briefly referred to as "Tracking Tools" in this document, unless there is reason to differentiate.

For example, although Cookies can be used on both web and mobile browsers, it would be inappropriate to talk about Cookies in the context of mobile applications, since they are Tracking Tools that require the presence of a browser. For this reason, within this document the term Cookie is used only to specifically indicate that particular type of Tracking Tool.

Some of the purposes for which Tracking Tools are used may also, depending on applicable regulation, require the user's consent. If consent is given, it can be freely revoked at any time by following the instructions in this document.

The company uses Tracking Tools managed directly by the owner (commonly referred to as "First-Party" Tracking Tools) and Tracking Tools that enable services provided by third parties (commonly referred to as "Third-Party" Tracking Tools). Unless otherwise specified within this document, such third-parties have access to their respective Tracking Tools.

Duration and expiration of Cookies and other similar Tracking Tools may vary depending on what is set by the Data Controller or each third-party provider. Some of them expire at the end of the user's browsing session.

In addition to what is specified in the description of each of the categories below, users can obtain more detailed and updated information on the duration, as well as any other relevant information - such as the presence of other Tracking Tools - in the privacy policies of the respective third-party providers (through the links provided) or by contacting the Data Controller.

What are Cookies? Cookies are small elements that are stored on your computer when you visit a website. These are used to personalise users' browsing and to collect automatic access and usage information about access to and use of the site. When the website is trustworthy, as in the

case of our portal, Cookies help to improve and speed up its navigation, as well as facilitate your next visit by making the site more suited to your needs.

This is the sequence of setting (or creating) a Cookie:

when you visit a website for the first time, it asks you to accept a Cookie for a specific domain. If you accept, the Cookie is saved on your computer.

Each time you view a resource from that domain, your browser sends the Cookie.

Can I block Cookies?

Yes, you can block or allow Cookies on all websites, or choose the sites for which you want them to be allowed.

Should I block all Cookies?

Not necessarily. Blocking all Cookies can actually help to protect privacy, but it also limits the features available on some websites. It is therefore advisable to choose the websites for which you want to allow Cookies. You can then initially block all Cookies and then allow the ones that are necessary for sites that are considered trustworthy.

What are Temporary Cookies?

Temporary Cookies (or Session Cookies) are removed from your computer when you close the browser. They are used to store temporary information, for example the items in your shopping cart.

What are Persistent Cookies?

Persistent Cookies (or Stored Cookies) remain stored on your computer even after closing the browser. They are used to store information, such as, for example, the login name and password, so that the user does not have to re-enter them every time he/she visits a specific site. Persistent Cookies may remain on your computer for days, months, or even years.

What are displayed website Cookies?

Displayed website Cookies are derived from the website you are viewing and may be persistent or temporary. They can be used to store information that will be reused the next time you visit the site.

What are Third-party Cookies?

Third-party Cookies derive from ads from other sites, such as pop-ups or banners for advertisements on the displayed website. They can be used to record the use of the website for marketing purposes.

Activities strictly necessary to ensure the functionality of sites operated by "Swiss Merchant Investments SA" and the provision of the service

"Swiss Merchant Investments SA" uses Cookies commonly referred to as "Technical" or other

similar Tracking Tools to perform activities strictly necessary to ensure the functionality or provision of the service.

Other activities involving the use of Tracking Tools

- Simple interactions and functionality

"Swiss Merchant Investments SA" uses Tracking Tools to enable simple interactions and activate features that allow users to access certain resources of the service and simplify communication with the Data Controller.

- Improving the experience

"Swiss Merchant Investments SA" uses Tracking Tools to provide a personalised user experience, allowing better management of personal settings and interaction with external networks and platforms.

- Measurement

"Swiss Merchant Investments SA" uses Tracking Tools to measure traffic and analyse users' behaviour with the aim of improving the service.

How to manage preferences and give or withdraw consent

There are a number of ways to manage your Tracking Tool preferences and to give or withdraw consent where necessary:

Users can manage their Tracking Tools preferences directly through their devices' settings - for example, they can prevent the use or storage of Tracking Tools.

In addition, whenever the use of Tracking Tools is dependent on consent, the user may give or withdraw such consent by setting his/her preferences within the Cookie policy or updating such preferences via the tracking settings widget, if any.

You can also remove previously saved Tracking Tools using special browser or device functions.

Other Tracking Tools in the browser's local memory can be removed by deleting the browsing history.

Regarding Third Party Tracking Tools, users may manage their preferences and withdraw their consent by visiting the relevant opt out link (if available), using the tools described in the third party's privacy policy or contacting the third party directly.

Here are the procedures for enabling or disabling, deleting or blocking Cookies on the main browsers.

GOOGLE CHROME

Activating or deactivating cookies

1. Click the Chrome menu icon.
2. Select Settings.
3. At the bottom of the page, click Show advanced settings.
4. In the "Privacy" section, click Content Settings.
5. Enable or disable Cookies:
6. To enable Cookies, select Allow local data storage (recommended).
7. To disable Cookies, select Prevent sites from setting data.
8. Click Finish to save.

If you prefer that Google Chrome doesn't store a record of your visits and downloads, you can browse the web in incognito mode. Opening an incognito navigation window. An incognito navigation window looks different from a normal window. The top of an incognito navigation window is grey or blue, depending on your computer or device. To open an incognito navigation window, click on the menu at the top under "File" and in the sub menu click "New incognito navigation window". Exiting incognito mode. To exit incognito mode, you can click the X icon in the corner of the window, or use the keyboard shortcut Alt+F4 (Windows and Linux) or -Shift-W (Mac). Closing the last tab in a window; the window is automatically closed as well.

How does it work?

- The browsing history is not recorded. Are web pages viewed and files downloaded in incognito mode not recorded in browsing and download histories?
- Cookies are deleted. All new cookies are deleted after closing all incognito windows.
- You can easily switch between incognito and normal browsing modes and vice versa.
- You can open incognito and normal windows at the same time and switch between them.
- Extensions are deactivated

- Extensions are automatically deactivated in incognito browsing windows. That's because Google Chrome doesn't control how extensions handle your personal information. If you want an extension to be displayed in incognito browsing windows, select the "Allow incognito mode" check box for the extension.

Data storage? Does Chrome store updates to Favourites and General Settings? Chrome stores any changes you make to your Favourites or General Settings in incognito mode. Could websites keep a record of your visit? Incognito browsing is only intended to prevent Google Chrome from storing information about the websites you visit. Records of your visit may be stored on the websites you visit. In addition, all files saved on your computer or mobile devices are retained.

INTERNET EXPLORER

To delete cookies, perform the following procedure:

1. To open Internet Explorer, click the Start button. In the search box, type Internet Explorer and then in the list of results click Internet Explorer.
2. Click the Tools button and then choose Internet Options.
3. Click the General tab, and then under Browsing History, click Delete.
4. Select the Cookie check box and then click Delete if not already selected. Select or clear the check boxes for any other options you want to delete. To keep Cookies for saved favourites, select Keep Data on the favourite websites check box.

OPERA

For Cookie preferences go to Preferences > Advanced > Cookies. These settings allow you to configure cookie management in Opera. The default setting is to accept all cookies.

Accept Cookies: All Cookies are accepted.

Accept Cookies only from the site you are visiting: Third-Party Cookies, sent from a domain other than the one you are visiting, are rejected.

Never accept Cookies: all Cookies are rejected Delete new cookies when exiting Opera: some websites need Cookies to function properly. In this case, if you want to prevent the Cookies sent from being stored between browsing sessions, activate the "Delete new cookies when leaving Opera" option.

Ask before accepting a Cookie: To decide what to do with the cookies you receive, select "Ask before accepting a Cookie". Each time you place a new Cookie, you will see the Cookie dialogue containing information about the Cookie's origin and attributes.

Cookie management: the Cookie manager allows you to examine and modify the Cookies saved in Opera. The "Manage Cookies..." button opens a window containing a list of folders, each identified by a domain. After using the quick search field

to locate a domain, open its folder to view all Cookies attached to it.

The Cookie dialogue box: this is displayed whenever a website offers a Cookie, but only if you have enabled the "Ask before accepting a Cookie" option under Preferences > Advanced > Cookies. The dialogue displays the source of the Cookie and its attributes and allows you to choose whether to accept or reject it.

Force removal when exiting Opera: Check the box "Force removal when exiting Opera" to request that the Cookie is removed at the end of the session regardless of its expiration date.

Remember your choice for all Cookies for this domain: To accept or reject all Cookies set for the same domain, check the box "Remember my choice for all Cookies for this domain". This way, the next time a Cookie is offered for the same domain, the dialogue will no longer be shown.

Cookie details? Click on "Cookie Details" to view all attributes.

SAFARI

To set a Cookie blocker, click Block Cookies and choose "Never", "Third-party and advertisers" or "Always". Cookies are pieces of information from websites that are stored on your device so that the websites can remember you on your next visit, and so that the web page can be customised based on the information obtained. Important: Some pages may only work if you accept Cookies.

To activate or deactivate JavaScript: click on Advanced and activate or deactivate the corresponding option. JavaScript allows web programmers to control page elements. For example, a page using JavaScript might display the current date and time or open a link in a new pop-up window.

To remove information from the device:- To clear your history from Safari, tap Settings > Safari > Clear History. - To clear all Cookies from Safari, tap Settings > Safari > Clear Cookies and Data. To clear other information stored by Safari, tap Advanced > Website data > Remove all website data.

FIREFOX

To check or change your settings: click the menu button and select Options. Select the Privacy panel. Under History Settings:

select Use Custom Settings. To enable Cookies, check the Accept Cookies from sites box; to disable cookies, uncheck the box. If you are experiencing issues with Cookies, make sure that the Accept Third-Party Cookies option is not set to Never. Choosing how long Cookies can be stored? Keep them until they expire: Cookies will be removed when they reach their expiration date (the date set by the site sending the Cookies). Keep them until you close Firefox: Cookies stored on your computer will be removed when you close Firefox. Save them until you ask every time: displays a warning whenever a website attempts to set a Cookie and asks the user if he/she wants this Cookie saved. Click OK to close the options window.

Delete Cookies for a specific site:

1. Click the menu button and select Options.
2. Select the Privacy panel.
3. Under History settings: select Use custom settings.
4. Click Show Cookies.... The Cookie window will appear.
5. In the Search field, type the name of the site whose cookies you want to remove. A list of cookies related to your search will appear.
6. In the list, select the Cookies you want to remove and click the Remove Cookies button.
7. To select all Cookies in the list, select the first Cookie and press the Shift+End keys.
8. Click the Close button to close the Cookie window.
9. Click OK to close the options window.

Delete all Cookies:

1. Click the menu button, select History and then Clear Recent History.
2. From the Time range to delete drop-down menu: select all.
3. Click the arrow next to Details to display the list of items to delete.
4. Select Cookies and make sure the other items you want to keep are not selected.

5. Click Clear Now to delete Cookies, then close the Clear All History window. Block Cookies from a specific site: Visit the site you wish to block from setting Cookies. Right-click with the mouse cursor inside the page and select the Page Information item. In the Page Information window, select the Permissions panel. In the Set Cookies row, remove the check mark from Use defaults. Select the Lock option. Close the Page Information window. Remove any cookies that the website has already set in Firefox. View the list of blocked websites. Click the menu button and select Options. Select the Privacy panel. Under History settings: select Use custom settings. Next to Accept Cookies from sites, click the Exceptions button. Block Cookies from all sites Click the menu button and select Options. Select the Privacy panel. Under History settings select the option Use custom settings.

Remove the check mark from Accept Cookies from sites. Click OK to close the options window.

Disable Third-Party Cookies

Third-Party Cookies are Cookies set by a website other than the one you are currently visiting. For example, the cnn.com website might contain a Facebook "Like" button within it. That button will set a Cookie that can be read by Facebook. This could be considered a Third-Party Cookie. Some advertisers use these types of Cookies to keep track of user visits across all the sites on which they offer their services. If a user feels that this tracking may be a source of concern and intrusion of their privacy, Third-Party Cookies can be disabled in Firefox.

Notes:

Disabling Third-Party Cookies may prevent tracking by advertisers in some cases but not all.

Some websites (such as Microsoft's Hotmail, MSN and Windows Live Mail inboxes) use Third-Party Cookies for purposes that are not necessarily privacy related, and disabling them may interfere with the proper functioning of those sites.

Third-party Cookie settings are available in the Firefox Options Privacy panel window: click the menu button and select Options. Selecting the Privacy panel? Under History settings: select Use custom settings. Set the Accept Third-Party Cookies option to never?

Note: If, when browsing with this setting, you find that you cannot view some of your favourite websites properly, an intermediate solution is to set the option to Accept Third-Party Cookies on the sites you visit. This setting allows you to accept Third-Party Cookies from websites you have previously visited.

Since the use of Third-Party Tracking Tools on this website cannot be fully controlled by the

Data Controller, any specific reference to Third-Party Tracking Tools is to be considered indicative. For complete information, users are kindly invited to consult the privacy policy of the respective third party services listed in this document.

Given the objective complexity of identifying tracking technologies, users are invited to contact the Data Controller should they wish to receive further information regarding the use of such technology on this web page.

Definitions and legal references

Personal Data (or Data)

Personal data is any information that, directly or indirectly, even in connection with any other information, including a personal identification number, makes a natural person identified or identifiable.

Usage Data

This is the information collected automatically through the websites managed by "Swiss Merchant Investments SA" (including by third party applications integrated into the sites themselves), including: IP addresses or domain names of computers used by the person that connects to the web sites, the URI (Uniform Resource Identifier), the time of the request, the method used to forward the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc.), the country of origin, the characteristics of the browser and operating system used by the visitor, the various temporal information of the visit (e.g. the time spent on each page) and the details of the series of activities conducted within the application, with particular reference to the sequence of pages consulted, the parameters relating to the operating system, and the user's IT environment.

User

The individual who uses the sites of "Swiss Merchant Investments SA" which, unless otherwise specified, is also the Data Subject.

Interested Party

The natural person to whom the Personal Data relates.

Data Processor (or Processor)

The natural person, legal entity, public administration and any other entity that processes personal data on behalf of the Data Controller, according to what is set out in this privacy policy.

Data Controller (or Controller)

The natural or legal person, public authority, service or other body which, individually or jointly with others, determines the purposes and means of the processing of personal data and the instruments adopted, including the security measures relating to the operation and use of the websites offered by "Swiss Merchant Investments SA". The Data Controller, unless otherwise specified, is the Controller of "Swiss Merchant Investments SA"

The websites of "Swiss Merchant Investments Ltd"

The hardware or software tools by which users' data are collected and processed.

Service

The service provided by "Swiss Merchant Investments SA" as defined in the relevant terms (if any) on this website/application.

European Union (or EU)

Unless otherwise specified, any reference in this document to the European Union shall be deemed to extend to all current member states of the European Union and the European Economic Area.

Cookie

Cookies are Tracking Tools that consist of small pieces of data stored within the user's browser.

Tracking Tool

Tracking Tool means any technology - e.g. Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that allows users to be tracked, for example by collecting or storing information on the user's device.

Legal references

This privacy policy is prepared on the basis of multiple legislative orders, including Articles 13 and 14 of EU Regulation 2016/679.