



Privacy Policy of ICE Wealth

1. Introduction

- 1.1. Ephelia Capital Sagl through the ICE Wealth Platform ("ICE WEALTH") respects Users' privacy. This Privacy Policy explains (i) what information ICE WEALTH collects through the Users access and use of the Website as well as through the access and use of the Services; (ii) the use ICE WEALTH makes of such information; and (iii) the security level ICE WEALTH provides for protecting such information.
- 1.2. By expressly accepting this Privacy Policy, the Users agree to the terms and conditions of this Privacy Policy and are aware that ICE WEALTH's policies may change in the future to adapt to future practices, technology or modification in the law. All terms not defined herein are defined in the Terms accessible at icewealth.io

2. Collected information

- 2.1. When Users access and use the Services, ICE WEALTH collects the specific following personal data and information ("User Information") are collected and managed for the purposes and within the times indicated below:

Data	Mode of data acquisition	Purpose of the treatment	Legal basis of the treatment	Data retention time
Technical data, such as IP address, browser characteristics (type, language, installed plug-ins, etc.).	Automatic during the platform visit	Visit of the platform by the user	Predominant private interest	10 years
data collected from third-party plugins/websites that are provided when users submit their user Information through the Services	Automatic once the user give its consent	Access to the platform by the user	Predominant private interest	Until cancellation request
Identity information such as name, address, company name, ID card, birthday, email address	Entered by the user when registering for the platform or using the contact forms	Registration of personal data for accounting reasons and AML requirements	Fulfilment of contractual obligations and compliance with Anti Money Laundering Act	10 years after termination of the relationship (legal requirement)
Information on services purchased, means of payment used and price paid.	Entered by the user during the use of the platform	Recording financial data for accounting reasons	Art. 958f Code of Obligations	10 years



E-mail	Entered by the user	Newsletter registration	Predominant private interest	Until cancellation request
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3. Use of collected information

- 3.1. The User Information listed in Section 2.1 are strictly necessary for ICE WEALTH's core Services, to provide notably a meeting place for Entrepreneurs of early stage ventures and Investors and enabling Investors to invest within such early stage ventures. Users can withdraw at any time their consent for such specific data processing. Please note however that such data processing is strictly necessary to provide the Users the Services and that a withdrawal may lead to the drawback that ICE WEALTH would not be able to provide and perform properly the Services any more. In such case, ICE WEALTH may terminate the Users' access and/or use to all or part of the Services without incurring any liability whatsoever.
- 3.2. In addition, ICE WEALTH collects the User Information listed in Section 2.1 for the following specific purposes:
- 3.2.1. to provide Users email alerts on interesting investments;
 - 3.2.2. to communicate with the Users;
 - 3.2.3. to provide the Business Management Tools to the Users;
 - 3.2.4. to fuel a jobs posting section on the Website;
 - 3.2.5. the Users' subscription to ICE WEALTH's newsletter, in order to provide them further news and updates such as new investments matching their interest;
 - 3.2.6. to provide Users with targeted marketing and advertising tailored to their preferences;
 - 3.2.7. to offer Users similar Services;
 - 3.2.8. to re-engage Users accessing and using the Services;
 - 3.2.9. to improve the Services;
 - 3.2.10. for cybersecurity of the Services; and
 - 3.2.11. for statistical and planning purposes.

Users can withdraw at any time their consent for the such specific data processing listed in this Section 3.2. In addition, Users have the rights set forth in Section 10 of this Privacy Policy.

4. Third-party websites

The Website may contain links to other websites. This Privacy Policy does not apply to the practices of any company or individual that ICE WEALTH does not control, nor to any websites that may be linked from the Website. Users should carefully review the privacy policies of any websites that Users visit from the Website to learn more about their information and privacy practices. The collection and use of User Information or any other personal information shall be governed by such other party or website's privacy policy. ICE WEALTH cannot be held responsible for their privacy practices. In particular, the Website contains links to third-party websites such as listed in Section 2.1, of which privacy policies can be found on their respective websites.

5. Communication to third parties

ICE WEALTH may in some limited instances communicate the User Information to specific third parties, on a strict need-to-know basis, to achieve the purposes described in this Privacy Policy:

- 5.1. ICE WEALTH's personnel;
- 5.2. Investors, with respect to Entrepreneurs and vice versa;



- 5.3. ICE WEALTH's service providers such as the companies listed under Section 4, in particular for targeted marketing and advertising;
- 5.4. competent courts or supervisory or regulatory bodies, when ICE WEALTH shall compellingly disclose User Information, pursuant to any applicable law, regulation or order, e.g. in case of merger, sale or acquisition, or in case of bankruptcy and liquidation, if applicable.
- 5.5. ICE WEALTH's IT systems providers, cloud service providers, database providers and consultants;
- 5.6. business partners with whom ICE WEALTH conducts business with, which is necessary to offer the Services jointly with ICE WEALTH; and
- 5.7. any third-party to whom ICE WEALTH assigns or transfers any of ICE WEALTH's rights or obligations.

6. International transfer

The data collected by the Company are stored in Switzerland. Should we transfer your data outside Switzerland, we will ensure that in the first instance the data is stored in countries that guarantee adequate protection of personal data, such as member states of the European Economic Area. If this is not possible, we will ensure that the provisions of the applicable legislation on the transfer of personal data to third countries are complied with in all cases.

7. Cookies

- 7.1. ICE WEALTH also uses "cookies" to collect information. A cookie is a small data file that ICE WEALTH transfers to electronic device and is stored on the User's electronic device. When Users access and use the Services, e.g. the Website, the cookie identifies the User's electronic device. ICE WEALTH also uses cookies to measure the traffic to and usage of the Services and their different features, and other miscellaneous uses. ICE WEALTH's Cookies Policy is set forth herein below.
- 7.2. If Users do not wish to have cookies placed on their electronic device, Users should set their browser or electronic device to refuse cookies before using the Services, with the drawback that certain features of the Services may not function properly without the help of cookies.

8. Privacy Policy changes

Any future modifications or amendment to this Privacy Policy and/or to the processing of User Information, as described in this Privacy Policy, will be notified to Users in advance through an individual notice through ICE WEALTH's usual communication channels (e.g. by email or communication within their Account) as well as through the Website (via banners, pop-ups or other notification mechanisms).

9. Data security

ICE WEALTH always strive to ensure security, integrity and privacy of the User Information. ICE WEALTH has adopted and implemented technical and organizational measures to avoid unauthorized access or disclosure of any User Information.

10. Users' rights

Users may exercise the following rights under the conditions and within the limits set forth under applicable law:

- 10.1. the right to access their User Information, as processed by ICE WEALTH and, if Users believe that any information relating to them is incorrect, obsolete or incomplete, to request its correction or update;
- 10.2. the right to request the erasure of their User Information or the restriction thereof to specific categories of processing;
- 10.3. the right to object to a channel of communication used for direct marketing purposes;



- 10.4. the right (i) to be informed about any decision making, based the fully automated processing of their User Information, (ii) to express their view on such decision and (iii) to require that it be verified by a human being, except if (a) such decision is directly related to the conclusion of an agreement between ICE WEALTH and their request is accepted or (b) if they have given their express consent to such automated decision making; and
- 10.5. the right to request their User Information's portability, i.e. that the User Information Users have provided to ICE WEALTH be returned to the concerned User or transferred to the person of their choice, in a structured, commonly used and machine-readable format without hinderance from ICE WEALTH and subject to their confidentiality obligations.

11. Governing law and jurisdiction

- 11.1. This Privacy Policy and all matters arising out of or relating to this Privacy Policy shall be governed by Swiss law at the exclusion of any provisions of conflict of law rules that might lead to the application of other than Swiss law.
- 11.2. Users irrevocably submit to the exclusive jurisdiction of the competent courts of Lugano, Switzerland, for any conflict arising from or in connection with this Privacy Policy.

12. Questions

For any question about this Privacy Policy or ICE WEALTH's policies, please contact ICE WEALTH at info@icewealth.io