

European Union General Data Protection Regulation Privacy Notice

This Privacy Notice describes how Global Wealth Management, L.C. (“we”, “us”, the “Company”) treats personal data of individuals in the European Economic Area (EEA). The information in this Notice is provided pursuant to the European Union’s General Data Protection Regulation (GDPR) with regard to us acting as a data controller.

Our Data Protection Officer can be reached at 305-851-2476 info@gwm-ch.com. Contacting us through other means could impact your rights and our obligations under the GDPR.

Basis for and Purposes of Data Processing

We collect and process your personal data when processing is necessary for the performance of our contract with you or your designee.

We also process your personal data in order to comply with applicable U.S. laws. Basis for such processing are our legitimate interests, as we could not provide you with the required services unless we complied with U.S. laws.

We do not process your personal data for direct marketing purposes.

Personal Data Not Obtained From You

We obtain personal information about you from other sources, including those publicly accessible, in order to assist us in verifying your identity, and for anti-money laundering purposes.

Recipients of Personal Data

We share your personal data with unaffiliated service providers to help conduct our business, and these arrangements are subject to data protection agreements.

International Transfers

Even though, we maintain a branch in Switzerland, we are based in the U.S. (a country for which the EEA has not issued an adequacy decision on the protection of personal data). Data transfers to U.S. companies are necessary for the performance of our contract with you.

Data Storage Period

We process and store personal data for as long as is required to provide services, which is typically for the duration of our contract with you or your designee. The criteria used to determine extended data storage (such data will be kept confidential, unless otherwise required by law) depend on our responsibilities as an investment adviser to comply with regulatory and legal requirements, along with corporate standards, prevent fraud and market abuse, and maintain cyber and information security and privacy protections, as well as data integrity and system controls.

Your GDPR Rights

You can exercise or address these rights (subject to retention and other requirements under applicable law) by contacting our Data Protection Officer identified in the beginning of this Notice.

1. **Access.** You have the right to obtain access to your personal data.
2. **Rectification.** You have the right to ask for incorrect, inaccurate, or incomplete personal data to be corrected.
3. **Erasure.** You have the right to request that personal data be erased as long as erasure of personal data complies with regulatory and legal requirements.
4. **Restriction on processing.** Depending on regulatory and legal requirements, you have the right to request the restriction of the processing of your personal data in specific cases.
5. **Objection to processing.** You have the right to object to the processing of your personal data for marketing purposes or on grounds relating to your particular situation.
6. **Portability.** You have the right to receive your personal data in a machine-readable format and send it to another controller.
7. **Withdrawal of consent.** You have the right to withdraw consent from direct marketing.
8. **Lodging a complaint with a Supervisory Authority.** You have the right to lodge a complaint with a Supervisory Authority within your Member State.