

Data Protection Statement

1. Preliminary remarks

Rothschild & Co Wealth Management Israel Ltd. (R&COWMI), a representative office of Rothschild & Co Bank AG in Switzerland ("The Bank"; while the former being the "Representative Office" or "R&COWMI") has issued the below privacy statement (the "Privacy Statement"), which supplements the full Data Protection Information provided alongside it (the "Privacy Notice") issued by the Bank.

With the following information R&COWMI would like to give an overview of how personal data will be processed and of the data subject's rights according to the Protection of Privacy Law, 1981 (the "PPL") and its regulations. The details on what data will be processed and how depend significantly on the services applied for or agreed upon. Hence, not every element of this information may be applicable to all clients and data subjects (e.g. authorized representative, authorized signatory, holder of a power of attorney, director, beneficial owner, potential new client / prospect; collectively the "Client(s)").

2. Who is responsible for data processing and who can I contact?

The Bank and R&COWMI are the data controllers, as defined under the PPL. The Client can reach R&COWMI's responsible department and representatives for data protection matters at:

Rothschild & Co Wealth Management Israel (R&COWMI) Ltd., 5-7 Hachoshlim, St. Herzelia Pituach 4672405, Israel.

Email: data.protection@il.rothschildandco.com

3. Which sources and which data do we use?

R&COWMI processes personal data that it obtains from the Clients in the context of the business relationship and/or insofar as required by law or as necessary to render its service – personal data that it obtains from legally and/or publicly accessible sources (e.g. debt registers, land registers, commercial and association registers, press, internet) or that is legitimately transmitted to it by other companies in the Rothschild & Co group or from other authorized third parties (e.g. a credit agency).

R&COWMI and/or the Bank may collect various types of personal data (collectively referred to throughout this Privacy Statement as the "Personal Data") about the Clients, depending on the particular services it provides, including, but not limited to:

- identification data (e.g., name, ID card, passport details and other national ID numbers or identifiers, date and place of birth, nationality, gender, IP address and/or other personal or digital identifiers);
- contact details (e.g., address and email address, phone number);

- family situation (civil status, number of children);
- authentication data (e.g., specimen signature);
- financial status (e.g., creditworthiness data, scoring/rating data, origin of assets);
- banking, financial and transaction-related data with respect to the assets deposited with the Bank or received by it;
- marketing and sales data (including advertising scores);
- data from the interactions between R&COWMI and/or the Bank and the Client (e.g. meetings, calls, emails, documents exchanged);
- data relating to the Clients' use of the Bank's and/or R&COWMI's services, including webpages, applications and/or other digital services' data as defined under their respective privacy and/or cookies policies;
- background checks, tax situation and/or other data similar and/or related to the categories mentioned.

4. What do we process Client data for (purpose of processing)?

R&COWMI processes Personal Data in accordance with the provisions of the PPL, and other applicable regulations as follows:

4.1. To comply with legal and regulatory obligations

R&COWMI and the Bank may process personal data to comply with legal and regulatory obligations, including identity verification, fraud prevention, anti-money laundering, tax supervision, and risk management, which may extend to laws outside the Client's country of residence.

4.2. Based on Client's consent

R&COWMI and/or the Bank would need to process Personal Data to deliver services and manage the client relationship. Such processing may also include managing communications, conducting needs and risk assessments, optimizing service quality, ensuring the provision of services efficiently and securely, and performing administrative and operational functions. It may also involve using publicly available data for client acquisition and conducting data analytics to improve services and assess client preferences and requests. The Client understands that without providing the necessary information for these purposes, the Bank and R&COWMI may be unable to offer certain services, in whole or in part.

In addition, the Client acknowledges that, as long as it has granted R&COWMI and the Bank consent to process its personal data for certain purposes, this processing is legal on the basis of the Client's consent. Consent given can be withdrawn at any time. Withdrawal of consent does not affect the legality of data processed prior to withdrawal or data that may be processed afterward to comply with legal or regulatory requirements.

5. Who receives Client data?

Outside R&COWMI, service providers and vicarious agents appointed by R&COWMI may receive access to data for the purposes mentioned above, if they maintain banking confidentiality. These are companies in the categories of banking services, IT services, logistics, printing services, telecommunications, collection, advice and consulting, sales and marketing.

R&COWMI is obliged to maintain client's confidentiality regarding all client-related matters and assessments of which R&COWMI acquires knowledge of and it may pass on information about a Client only if legal provisions require it, if a Client has given his consent as detailed above, or as required to provide the Client with the requested services. Under these circumstances, recipients of personal data can be, for example:

- public entities and institutions (e.g. Israel National Bank,) and other competent regulatory, prosecuting, tax or governmental authorities, courts or other tribunals in any jurisdiction upon providing a legal or official obligation;
- creditors or liquidators submitting queries in connection with a foreclosure;
- service providers in connection with credit or bank cards;
- R&COWMI's professional service providers (e.g. legal advisors, accountants, auditors, insurers and tax advisors);
- facilitators and external asset managers;
- third parties in connection with the granting of a loan (such as Rothschild & Co group companies and as such primarily Rothschild & Co Bank AG who's Representative office in Israel is R&COWMI, insurance companies, investment companies, trustees, service providers carrying out value assessments);
- other companies belonging to the Rothschild & Co group for the purpose of risk control due to statutory or official obligations (e.g. for group-wide monitoring of compliance, money-laundering and other risks); likewise primarily Rothschild & Co Bank AG;

6. Will data be transferred to a third country or international organization?

In the context of an international transfer, personal data may be transferred to: Switzerland, EU or European Economic Area Countries and United Kingdom.

Data transfer to units in states outside Israel, Switzerland, UK, the EU or the EEA (known as third countries) takes place so long as:

- it is required by law (e.g. reporting obligations under fiscal law);
- it is necessary to enable R&COWMI or the Bank to establish, exercise or defend itself against a present or future claim, or to enable it to deal with an investigation by a public authority, in Israel or abroad;
- it is necessary to protect an overriding public interest; or
- Clients have granted valid consent.

To obtain more details on international data transfers, the Clients may contact the Data Protection Officer, at the address provided for in section 2 above.

7. For how long will Client data be stored?

R&COWMI and/or the Bank will process and store personal data of Clients for as long as it is necessary in order to fulfill contractual and statutory obligations. If the data is no longer required in order to fulfill contractual or statutory obligations, it is deleted, unless further processing is required – for a limited time – for the following purposes:

- Fulfilling obligations to preserve records according to applicable law or regulation.
- R&COWMI and the Bank can face legal holds, which requires to keeping records for a defined or undefined period of time. A legal hold is a process that an organization uses to preserve all forms of relevant information when litigation is reasonably anticipated.

8. What data protection rights does a Client have?

Every data subject has the right to access personal data according to article 13 of the PPL, and the right to rectification according to article 14 of PPL. If you have any requests regarding your privacy rights, please contact our data protection representative.

9. Is a Client obliged to provide data?

The Client is not obliged by law to provide data, however, Client's data is required by R&COWMI's and/or the Bank for legally accepting and carrying out a business relationship and fulfilling the accompanying contractual obligations with the Client.

If a Client does not provide R&COWMI or the Bank with the necessary information and documents, R&COWMI and the Bank cannot enter into or continue the business relationship with a Client as desired.

10. Contact

If you have any questions, comments and requests related to this Privacy Statement, or if you have any complaints related to how R&COWMI or the Bank processes your Personal Data, please refer to the contact details under section 2 above.