#### **Customer Information**

This information brochure provides you with information about BLZ Invest AG (hereinafter referred to as "BLZ" or "Asset Manager"), our measures to prevent loss of contact or news, the financial services we offer and the associated risks, how we deal with conflicts of interest, compensation and the initiation of mediation proceedings before the ombudsman's office, as well as the data protection declaration. The information in this brochure may change from time to time.

The current version of this brochure can be accessed at any time at www.blzinvest.ch.

We inform you about the costs and fees of the financial services offered in the respective appendix to our asset management agreement.

For information on the risks generally associated with financial instruments, please refer to the brochure "Risks in Trading with Financial Instruments" published by the Swiss Bankers Association. The brochure is available on the Internet under the online link: "SBA\_Risks\_in\_Trading\_with\_Financial\_Instruments\_2019\_EN.pdf (www.swissbanking.ch)".

This brochure fulfils the information requirements under the Financial Services Act (FIDLEG) and the Data Protection Ordinance and is intended to provide you with an overview of BLZ's financial services and the handling of customer data.

If you would like further information, we would be happy to meet with you in person.

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#### 1. Information about BLZ

#### 1.1 General Information

Name	BLZ Invest AG
Address	Brandschenkestrasse 178
Zip code / City	8002 Zurich
Phone	+41 44 201 94 52 / 53
E-mail	info@blzinvest.ch
Website	www.blzinvest.ch
HReg-Nr.	CHE-115.717.076
VAT No.	CHE-115.717.076

#### 1.2 Field of activity

BLZ has its statutory seat and its registered office in Zurich. It mainly carries out the following activities:

Individual asset management for private and professional clients.

For more information about BLZ, please visit www.blzinvest.ch.

# 1.3 Supervisory status and competent authority and supervisory organization

BLZ is currently in the process of obtaining a license as an asset manager pursuant to Article 17 of the Financial Institutions Act (FINIG). The license is granted by the Swiss Financial Market Supervisory Authority FINMA, Laupenstrasse 27, 3003 Bern. As of the granting of the license, BLZ is supervised by AOOS - Schweizerische Aktiengesellschaft für Aufsicht, Clausiusstrasse 50, 8006 Zurich.

1.4 Economic ties to third parties

BLZ has no economic ties to third parties that could lead to a conflict of interest.

In particular, BLZ is neither legally nor economically part of a group or corporate structure, nor does it maintain any significant ties to third parties.

As an independent asset manager, BLZ consciously cooperates with several custodian banks.

## 2. Dormant assets

Occasionally, contacts with clients are broken off and the assets subsequently become dormant. Such assets may be permanently forgotten by the clients and their heirs. The following is recommended to avoid loss of contact or dormant assets:

- Change of address and name: Please notify us immediately of any change of residence, address or name;

- Special instructions: Please inform us about longer absences and about a possible redirection of correspondence to a third address as well as about the availability in urgent cases during this time;

- Granting of Powers of Attorney: An authorized person can be designated to be approached by BLZ in the event of a break in contact;

- Substitute contacts: It may be advisable to store the contact details of the legal successors and/or other persons who can be contacted by BLZ in the event of a break in communication or lack of contact, in order to be able to (re)establish contact with the customer or his legal successors. It is the customer's responsibility to inform BLZ of any changes in the respective contact data;

- Orientation of trusted persons and testamentary disposition: Another way to avoid lack of contact and news is to inform a trusted person about the relationship with BLZ. However, BLZ may only provide such a trusted person with information if it has been authorized to do so in writing. Furthermore, the assets concerned may be mentioned, for example, in a testamentary disposition;

BLZ will be happy to answer any questions. Further information can also be found in the brochure "Dormant Assets" published by the Swiss Bankers Association. The brochure is available on the Internet under the online link "Dormant Assets (swiss-banking.ch)".

3 Financial services offered by BLZ

3.1 Individual asset management

3.1.1 Nature, characteristics and operation of the financial service

In asset management, BLZ manages assets in the name of, for the account of and at the risk of the client, which the client has deposited with a custodian bank. BLZ shall carry out transactions at its own free discretion and without consulting the client. In doing so, BLZ shall ensure that the

transaction executed by it is in line with the client's financial circumstances and investment objectives as well as the investment strategy agreed with the client and shall ensure that the portfolio structuring is suitable for the client.

# 3.1.2 Rights and duties

In asset management, the client has the right to manage the assets in his portfolio. In doing so, BLZ shall select the investments to be included in the portfolio with due care within the framework of the market offer taken into account. BLZ shall ensure an appropriate distribution of risk as far as the investment strategy allows. It regularly monitors the assets it manages and ensures that the investments are in line with the investment strategy agreed in the investment profile and are suitable for the client.

BLZ shall regularly inform the client about the agreed and provided asset management.

In accordance with Art. 72 FIDLEG, BLZ is also obliged to provide the client with a copy of his client file and all documents relating to him at his request. By signing the contract, the client agrees that the disclosure may be made electronically.

## 3.2 Risks

The following risks may arise in connection with the financial services provided by BLZ, which are within the customer's sphere of risk and must therefore be borne by the customer:

- Risk of the selected investment strategy: Various risks may arise from the investment strategy selected and agreed upon by the client (see below). The customer bears these risks in full. A presentation of the risks and a corresponding risk explanation are provided before the investment strategy is agreed.

- Asset preservation risk, or the risk that the financial instruments in the portfolio will lose value: This risk, which may vary depending on the financial instrument, is borne in full by the client. For the risks of the individual financial instruments, please refer to the brochure "Risks in Trading with Financial Instruments" of the Swiss Bankers Association.

- Information risk on the part of BLZ or the client, or the risk that BLZ or the client has too little information to make an informed investment decision:

When managing assets, BLZ takes into account the client's financial circumstances and investment objectives (suitability test). If the client provides BLZ with insufficient or inaccurate information about his financial circumstances and/or investment objectives, there is a risk that BLZ will not be able to make investment decisions that are suitable for the client.

- Risk as a qualified investor in collective investment schemes: Clients who make use of asset management or investment advisory services within the framework of a mandate that is designed to last are considered qualified investors within the meaning of the Collective Investment Schemes Act. Qualified investors have access to forms of collective investment schemes that are exclusively open to them. This status enables a broader range of financial instruments to be taken into account in the design of the portfolio. Collective investment schemes for qualified investors may be exempt from regulatory requirements. Such financial instruments are therefore not or only partially subject to Swiss regulations. This may give rise to risks, in particular due to liquidity, investment scheme can

be found in the constituent documents of the financial instrument and, if applicable, in the basic information sheet and the prospectus.

Furthermore, risks may arise in the course of asset management which lie within the sphere of risk of BLZ and for which BLZ is liable vis-à-vis the client. BLZ has taken suitable measures to counter these risks, in particular by observing the principle of good faith and the principle of equal treatment when processing client orders. As far as it is within its sphere of influence, BLZ shall ensure the best possible execution of customer orders.

3.3 Market supply taken into account

The market offer taken into account in the selection of financial instruments covers exclusively third-party financial instruments. Within the scope of asset management and

comprehensive investment advice, the following financial instruments in particular are available to the client:

- Account balances with domestic banks
- Money market investments
- Interest-bearing debt securities (bonds, etc.)
- Equity securities (shares, etc.)

- Collective investment instruments (investment funds of all standard banking investment instruments, namely securities, indices, real estate, commodities)

- Alternative investments, non-traditional investments
- Standardized and non-standardized derivative financial instruments
- Precious metals
- Insurance products

Use of derivative products

BLZ may use derivative products on behalf of its clients. BLZ shall only use such products if and to the extent that this is permissible in accordance with the statutory, professional and contractual investment regulations applicable in the specific case and taking into account any investment structures. Derivatives are used in this context to hedge existing securities positions or to build up new securities positions. Derivatives are permitted if they are traded on a recognized stock exchange or over the counter.

- Self-managed products
- BLZ does not offer self-managed products to its clients.
- BLZ will source these assets through a bank, exchange or broker.

## 4. Dealing with conflicts of interest

4.1 In general

Conflicts of interest may arise if BLZ has an interest in the outcome of a financial service provided to clients that conflicts with that of the clients.

Possible causes of conflicts of interest are namely:

- Financial incentives for BLZ to make certain investment decisions, e.g. compensation from third parties;

- The use of BLZ's own products or those of third parties economically linked to BLZ;

- The coincidence of several client orders;

- The coincidence of client orders with BLZ's own business or that of its employees.

No conflicts of interest shall arise at BLZ within the scope of the services provided to the client which could not be completely eliminated by countermeasures.

4.2 Compensation by third parties in particular

BLZ may receive compensation from third parties (e.g. brokerage fees, commissions, commissions, rebates, kick-backs, finder's fees, portfolio maintenance commissions or other pecuniary advantages) in connection with the provision of its financial services.

In order to avoid potential conflicts of interest in this context, BLZ has taken the following measures to minimise conflicts of interest through third-party compensation:

- Contractual regulation specifying the range in the individual service contracts;

- Obligation to disclose compensation from third parties: On request, BLZ shall inform the client of the compensation actually received;

- BLZ shall also agree with the client on a performance-related profit share based on the annual performance increase of the total assets under management. This shall lead to an alignment of the interests of BLZ and the client.

5. Ombudsman's office

In the event of a dispute, the client may initiate a mediation procedure before the following ombudsman's office:

Name OFS Ombud Finances Switzerland

Address 16 Boulevard des Tranchées

Zip code / City 1206 Geneva

Telephone +41 22 808 04 51

E-mail contact@ombudfinance.ch

Website www.ombudfinance.ch

## 6. Privacy Policy

## 6.1 General information

This data protection declaration provides information on how BLZ processes personal data. Personal data" means any information relating to a specific or identifiable natural or legal person. Processing" means any handling of personal data, regardless of the means and procedures used, in particular the acquisition, storage, use, modification, disclosure, archiving, deletion or destruction of personal data.

#### 6.2 Data security

BLZ undertakes to protect personal data and privacy in accordance with the applicable laws, in particular data protection law. To this end, it takes various technical and organizational security measures (e.g. access restrictions, firewalls, personalized passwords and encryption and authentication technologies, etc.).

6.3 Categories of personal data

BLZ processes the following categories of personal data. As little personal data as possible is always processed.

Customer data, such as:

- Master and portfolio data (e.g. name, address, nationality, date of birth, information on accounts, securities accounts, concluded transactions and contracts, information on third parties affected by data processing, such as spouses, authorized representatives and advisors);

- Transaction or order and risk management data (e.g. information on the beneficiaries of transfers, beneficiary bank, amount of transfers, risk and investment profile, information on investment products);

- Marketing data (e.g. preferences, needs).

6.4 Origin of personal data

In order to fulfil the purposes, set out in Section 5, BLZ may collect personal data from the following sources:

- Personal data that are disclosed to it, e.g. during the opening of business relationships, regular personal meetings, in the context of the execution of contracts or the use of products and services;

- personal data that is collected in the course of the use of products or services and that is transmitted to the company by the technical infrastructure or by processes based on the division of labor;

- Personal data from third party sources, e.g. from authorities or sanctions lists of the UN and the EU.

# 6.5 Purpose of processing

BLZ processes personal data in order to provide its own services as well as for its own purposes or those provided for by law. In particular, this includes the following:

- Conclusion and fulfillment of contracts, execution, processing and management of products and services (e.g. invoices, attachments);

- Monitoring and managing risks (e.g. investment profiles, anti-money laundering, limits, utilization figures, market risks);

- Planning, business decisions (e.g. development of new or evaluation of existing services and products);

- Marketing, communication, information about and review of service offerings (e.g. print and online advertising, customer, prospect or other events, identification of future customer needs);

- Fulfilment of legal or regulatory obligations to provide information or to report to courts, authorities, auditing companies, fulfilment of official orders (e.g. reporting obligations to FINMA and foreign supervisory authorities, orders from public prosecutors in connection with money laundering and terrorist financing); and

- Protecting our interests and securing our claims, e.g. in the event of claims against us or claims by us against third parties.

6.6 Disclosure to third parties, categories of recipients

BLZ shall disclose customer data to the following third parties in the following cases:

- To other service providers for outsourcing pursuant to Section 6.7 and for the purpose of comprehensive customer service;

- For order execution, i.e. when products or services are used;

- Due to legal obligations, legal justification or official orders, e.g. to courts, supervisory authorities, tax authorities or other third parties;

- As far as necessary to protect their legitimate interests, e.g. in the case of legal action threatened or initiated by customers against us, in the case of public statements, to secure our claims against customers or third parties, in the case of debt collection, etc;

- With the consent of the persons concerned to other third parties.

6.7 Outsourcing of services (outsourcing)

BLZ outsources certain services in whole or in part to third parties (in particular the management of the portfolio management system, CRM, legal and compliance).

The service providers who process personal data on its behalf for this purpose (so-called order processors) are carefully selected. Whenever possible, order processors domiciled in Switzerland are used. The order processors may be authorized to have certain services provided by third parties.

The order processors may only process personal data received in the same way as BLZ itself and are contractually obliged to guarantee the confidentiality and security of the data.

# 6.8 Duration of storage

The duration of the storage of personal data depends on the purpose of the respective data processing and/or statutory retention obligations, which amount to five, ten or more years depending on the applicable legal basis.

6.9 Rights of the persons concerned

Anyone can request information from BLZ as to whether personal data about him or her is being processed. There is a right of objection, restriction of processing and, where applicable, a right to data portability. Incorrect data can be corrected. In addition, the deletion of personal data may be requested, unless legal or regulatory provisions (e.g. legal retention obligations of business-relevant data) or technical hurdles prevent this. The deletion of data may mean that we can no longer provide certain services. In addition, where applicable, there is a right of appeal to a competent authority.

Where we process personal data on the basis of consent, this consent can be revoked at any time.

In order to support BLZ in responding to your request, we ask you to provide us with an appropriate comprehensible message. BLZ will review and respond to your request within a reasonable period of time.

6.10 Mentioned organizations, companies etc.

In this data protection declaration, organizations and companies are mentioned or described by name. As certain adjustments may become necessary in the future in the course of legal, regulatory and/or organizational changes (e.g. dissolution of the SRO or a (supranational, semi-) governmental organization), it goes without saying that successor organizations will also be covered by this declaration.

The currently valid data protection declaration can be retrieved at any time at www.blzinvest.ch

6.11 Contact

BLZ is responsible for processing your personal data. Requests can be sent to the following address:

**BLZ Invest AG** 

Brandschenkestrasse 178

8002 Zurich