

## CLIENT INFORMATION

This text applies mutatis mutandis to females and a plural

This information brochure provides you with information about Perpetual Wealth AG (hereinafter referred to as «Perpetual Wealth» or «Asset Manager»), our measures to avoid assets without contact and dormant assets, the financial services we offer and the associated risks, how we deal with conflicts of interest, compensations 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.

We inform you about the costs and fees of the financial services offered in the respective appendix to our Asset Management or Investment Advisory Agreement.

For information on the risks generally associated with financial instruments, please refer to the brochure «Risks Involved in Trading Financial Instruments» published by the Swiss Bankers Association. The brochure is available on the Internet under the online link:

[SBA\\_Risks\\_Involved\\_in\\_Trading\\_Financial\\_Instruments\\_2019\\_EN.pdf \(swissbanking.ch\)](#)

This brochure fulfils the information requirements under the Financial Services Act (FinSA) and the Ordinance to the Federal Act on Data Protection (DPO) and is intended to provide you with an overview of the financial services offered by Perpetual Wealth and the handling of client data.

Should you require further information, we would be pleased to be at your disposal in a personal meeting.

**Perpetual Wealth AG**

## Content

<b>1.</b>	<b>Information about Perpetual Wealth</b>	<b>3</b>
1.1	General information	3
1.2	Field of activity	3
1.3	Supervisory status and competent authority and supervisory organization	3
1.4	Business affiliations	3
<b>2.</b>	<b>Dormant assets</b>	<b>3</b>
<b>3.</b>	<b>Financial services offered by Perpetual Wealth</b>	<b>4</b>
3.1	Portfolio Management	4
3.1.1	Nature, features and functionalities of the financial service	4
3.1.2	Rights and obligations	4
3.2	Portfolio-related investment advice	4
3.2.1	Nature, features and functionalities of the financial service	4
3.2.2	Rights and obligations	4
3.3	Risks	4
3.4	Market offer taken into account	5
<b>4.</b>	<b>Conflicts of Interest</b>	<b>6</b>
4.1	In general	6
4.2	Compensations from third parties	6
<b>5.</b>	<b>Ombudsman's offices</b>	<b>6</b>
<b>6.</b>	<b>Data Privacy Policy</b>	<b>6</b>
6.1	General information	6
6.2	Data security	6
6.3	Categories of personal data	7
6.4	Origin of personal data	7
6.5	Purpose of processing	7
6.6	Disclosure to third parties, categories of recipients	7
6.7	Outsourcing of Services	7
6.8	Duration of storage	8
6.9	Rights of the data subjects	8
6.10	Mentioned organisations, companies etc.	8
6.11	Contact	8

## 1. Information about Perpetual Wealth

### 1.1 General information

Name	Perpetual Wealth AG
Address	Strehlgasse 33
ZIP / City	8001 Zurich
Phone	+41 43 500 17 10
E-Mail	jovanovic@perpetual-wealth.ch
Website	<a href="https://perpetual-wealth.ch/">https://perpetual-wealth.ch/</a>
Trade Reg. Nr.:	CHE-268.241.641
VAT.-Nr.:	CHE-268.241.641

### 1.2 Field of activity

Perpetual Wealth has its registered office and place of business in Strehlgasse 33, 8001 Zurich. It essentially carries out the following activities:

- Portfolio Management for professional and institutional clients;
- Investment advice for professional and institutional clients;

### 1.3 Supervisory status and competent authority and supervisory organization

Perpetual Wealth is currently in the process of obtaining a license as an asset manager pursuant to Article 17 of the Financial Institutions Act (FinIA). The license is granted by the Swiss Financial Market Supervisory Authority FINMA, Laupenstrasse 27, 3003 Bern. As of the granting of the license, Perpetual Wealth is supervised by the supervisory organization AOOS, Clausiusstrasse 50, 8006 Zurich.

### 1.4 Business affiliations

Perpetual Wealth has no economic associations with third parties which could lead to a conflict of interest. In particular, Perpetual Wealth is neither legally nor economically part of a group or corporate structure, nor does it maintain any significant ties with third parties. As an independent asset manager, Perpetual Wealth deliberately works together with several custodian banks.

## 2. Dormant assets

Occasionally, contacts with clients are broken off and assets subsequently become dormant. Such assets can 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:** Immediate notification of any change of residence, address or name;
- **Special instructions:** Information about longer absences and of any redirection of correspondence to a third-party address as well as of how the client can be reached in urgent cases during this time;
- **Granting of powers of attorney:** An authorized person can be designated whom Perpetual Wealth can approach in the event of an interruption of contact;
- **Substitute contacts:** It may be advisable to provide the contact details of the legal successors and/or other persons who can be contacted by Perpetual Wealth in the event of a breakdown or loss of contact in order to (re) establish contact with the client or his legal successors. It is the client's responsibility to inform Perpetual Wealth of any changes in the respective contact details;
- **Orientation of trusted persons and testamentary disposition:** Another possibility to avoid lack of contact and news is to inform a trusted person about the relationship with the asset manager. However, the asset manager may only provide information to such a trusted person if he or she has been authorized to do so in writing. Furthermore, the assets concerned may be mentioned, for example, in a testamentary disposition.

Perpetual Wealth is available for 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 \(swissbanking.ch\)](https://www.swissbanking.ch)

### **3. Financial services offered by Perpetual Wealth**

#### **3.1 Portfolio Management**

##### **3.1.1 Nature, features and functionalities of the financial service**

In asset management, Perpetual Wealth manages, in the name, for the account and at the risk of the client, assets which the client has deposited with a custodian bank. Perpetual Wealth carries out transactions at his own discretion and without consulting the client. In doing so, Perpetual Wealth ensures that the transaction he executes corresponds to the client's financial circumstances and investment objectives as well as to the investment objectives agreed with the client and ensures that the structuring of the portfolio is suitable for the client.

##### **3.1.2 Rights and obligations**

The client has the right that the assets in his portfolio are managed by the asset manager. In doing so, Perpetual Wealth selects the investments within the framework of the considered market offer to be included in the portfolio with due care. Perpetual Wealth shall ensure an appropriate distribution of risk to the extent permitted by the investment strategy. It shall regularly monitor the assets under his management and ensure that the investments are in line with the investment strategy agreed on in the investment profile and are suitable for the client.

Perpetual Wealth shall regularly inform the client about the asset management agreed on and provided to the client.

Pursuant to Art. 72 FinSA, Perpetual Wealth is also obliged to provide the client with a copy of its client file and all documents relating to them at the client's request. By signing the contract, the client agrees that the disclosure may be made electronically.

#### **3.2 Portfolio-related investment advice**

##### **3.2.1 Nature, features and functionalities of the financial service**

In providing comprehensive investment advice, Perpetual Wealth advises the client on transactions in financial instruments, considering the portfolio. To this end, Perpetual Wealth ensures that the recommended transaction corresponds to the financial circumstances and investment objectives as well as the needs of the client or the investment strategy agreed with the client. The client then decides for himself to what extent he wishes to follow the recommendation of Perpetual Wealth.

##### **3.2.2 Rights and obligations**

In the case of a portfolio-related investment advice, the client has the right to receive personal investment recommendations that are suitable for him. Portfolio-related investment advice is provided monthly at the initiative of Perpetual Wealth in relation to financial instruments available within the scope of the market offer considered. In doing so, Perpetual Wealth shall advise the client to the best of its knowledge and belief and with the same diligence that it uses in its own affairs.

Perpetual Wealth regularly checks whether the structuring of the portfolio for comprehensive investment advice corresponds to the agreed investment strategy. If it is found that there is a deviation from the agreed percentage structuring, Perpetual Wealth will recommend a corrective measure to the client.

Perpetual Wealth shall inform the client without delay of any significant difficulties which may affect the correct processing of the order. Furthermore, Perpetual Wealth shall regularly inform the client about the investment advice agreed on and provided to the client.

Perpetual Wealth shall draw up an advisory record for each advisory meeting. The client may at any time request that a record of one or more specific advisory meetings be provided.

Pursuant to Art. 72 FinSA, Perpetual Wealth is also obliged to provide the client with a copy of its client file and all documents relating to it at the client's request. By signing the contract, the client agrees that the documents may be provided electronically.

#### **3.3 Risks**

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

- **Risk of the selected investment strategy:** The investment strategy selected and agreed upon by the Client may give rise to various risks (cf. below). The client bears these risks in full. A presentation of the risks and a corresponding risk explanation are provided before the investment strategy is agreed on.

- **Substance preservation risk** or the risk that the financial instruments in the portfolio depreciate: This risk, which can 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 Involved in Trading Financial Instruments» of the Swiss Bankers Association.
- **Information risk on the part of Perpetual Wealth or the client**, or the risk that Perpetual Wealth or the client has too little information to make an informed investment decision:
  - In the case of **portfolio management**, Perpetual Wealth will take into account the client's financial circumstances and investment objectives. If the client provides Perpetual Wealth with insufficient or inaccurate information regarding his financial circumstances and/or investment objectives, there is a risk that Perpetual Wealth will not be able to make investment decisions that are suitable for the client.
  - In the case of **portfolio-related investment advice**, the client makes the investment decisions, even if Perpetual Wealth takes the portfolio into account in the portfolio-related investment advice. Accordingly, the client requires expertise to understand the financial instruments. Thus, investment advice creates the risk for the client that he will not follow investment recommendations that are suitable for him due to a lack of or inadequate financial knowledge.
- **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 permanent portfolio management or investment advice relationship are considered as qualified investors within the meaning of the Collective Investment Schemes Act (CISA). Qualified investors have access to forms of collective investment schemes that are exclusively open to them. This status allows a broader range of financial instruments to be taken into account. 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 with regard to liquidity, investment strategy or transparency. Detailed information on the risk profile of a particular collective investment scheme can be found in the constituent documents of the financial instrument and, where applicable, in the basic information sheet and the prospectus.

In the case of **investment advisory services**, the following additional risks may arise:

- **Risk regarding timing when placing orders** or the risk that following an advice, the client places a buy or sell order too late, which can lead to price losses: The recommendations made by Perpetual Wealth based on the market data available at the time of the advice and are only valid for a short period of time due to the market dependency.
- Only in the absence of monitoring by the asset manager: **Risk of insufficient monitoring** or the risk that the client does not monitor his portfolio or monitors it insufficiently: Before issuing an investment recommendation, Perpetual Wealth checks the composition of the portfolio when providing portfolio-related investment advice. Apart from this, Perpetual Wealth is not obliged to monitor the structuring of the portfolio at any time when providing both, portfolio-related and transaction-related investment advice. Inadequate monitoring by the client may give rise to various risks, such as cluster risks.

Furthermore, both portfolio management and investment advice may involve risks that lie within the sphere of risk of Perpetual Wealth and for which Perpetual Wealth is liable vis-à-vis the client. Perpetual Wealth has taken appropriate 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 Perpetual Wealth shall ensure the best possible execution of customer orders.

### 3.4 Market offer taken into account

The market offer taken into account when selecting the financial instruments comprises only third party financial instruments. Within the scope of portfolio management and portfolio-related investment advice, the following financial instruments in particular are available to the client:

- Account balances with domestic and foreign 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
- Standardised and non-standardised derivative financial instruments
- Precious metals
- Insurance products

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

## **4. Conflicts of Interest**

### **4.1 In general**

Conflicts of interest may arise when Perpetual Wealth has an interest in the outcome of a financial service provided to clients that is contrary to that of the Clients.

Possible causes of conflicts of interest are namely:

- Financial incentives for Perpetual Wealth to carry out certain investment decisions, e.g. compensation from third parties
- The use of Perpetual Wealth's own products or those of third parties economically linked to him
- The coincidence of several client orders
- The coincidence of client orders with Perpetual Wealth's own transactions or those of his employees.

Within the scope of the services provided to the Client, no conflicts of interest arise for Perpetual Wealth which could not be eliminated by countermeasures.

### **4.2 Compensations from third parties**

Perpetual Wealth does not accept any compensation from third parties (e.g. brokerage fees, commissions, rebates, kick-backs, finder's fees, portfolio management commissions or other pecuniary advantages) that are connected to the provision of its financial services. Should it nevertheless exceptionally receive services from third parties within the scope of its activities or on the occasion of the fulfilment of the order, these shall be passed on to the client in full.

However, certain services cannot be disclosed to the Client due to their nature (e.g., training services, market and financial analysis). The client knows these third-party services may lead to potential conflicts of interest by potentially causing Perpetual Wealth to select or recommend certain service providers, certain financial instruments or certain categories of financial instruments in order to receive compensation from third parties or to increase the amount of such compensation.

## **5. Ombudsman's offices**

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

Name	OFS Ombud Finance Switzerland
Address	16 Boulevard des Tranchées
ZIP / City	1206 Genf
Phone	+41 22 808 040 51
E-Mail	contact@ombudfinance.ch
Website	<a href="https://ombudfinance.ch/home-de/">https://ombudfinance.ch/home-de/</a>

## **6. Data Privacy Policy**

### **6.1 General information**

This data protection policy provides information on how Perpetual Wealth processes personal data. «Personal data» means all information relating to an identified or identifiable person. «Processing» any operation with personal data, irrespective of the means applied and the procedure, and in particular the collection, storage, use, revision, disclosure, archiving or destruction of data.

### **6.2 Data security**

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

### **6.3 Categories of personal data**

Perpetual Wealth processes the following categories of Personal Data. As little personal data as possible is processed at all times.

Customer data, such as:

- Master and inventory data (e.g. name, address, nationality, date of birth, information on accounts, custody 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, Perpetual Wealth may collect Personal Data from the following sources:

- Personal data 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 which is collected in the course of the use of products or services and which is transmitted to them by the technical infrastructure or by processes based on the division of labor
- Personal data from third party sources, e.g. from authorities or sanction lists of the UN and the EU.

### **6.5 Purpose of processing**

Perpetual Wealth processes personal data to provide its own services and for its own purposes or those provided for by law. In particular, the following purposes are to be considered:

- Conclusion and fulfilment of contracts, implementation, processing and administration of products and services (e.g. invoices)
- 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, client-, prospect- or other events, identification of future client 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)
- Safeguarding 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**

Perpetual Wealth will disclose client's data to the following third parties in the following cases:

- To other service providers in the context of an outsourcing pursuant to section 7 and for the purpose of comprehensive client support
- For the execution of orders, 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
- Where necessary to protect our legitimate interests, e.g. in the event of legal action threatened or initiated by clients against us, in the event of public statements, to secure our claims against clients or third parties, in the event of the collection of receivables, etc
- With the consent of the persons concerned, to other third parties.

### **6.7 Outsourcing of Services**

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

The service providers, who process personal data on our 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 Perpetual Wealth 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 data subjects**

Anyone can request information from Perpetual Wealth 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. Furthermore, the deletion of personal data can be requested, unless legal or regulatory provisions (e.g. legal retention obligations of business-relevant data) or technical hurdles stand in the way. 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 based on consent, this consent can be revoked at any time.

In order to assist Perpetual Wealth in responding to your request, we kindly ask you to inform us in a comprehensible manner about your request. Perpetual Wealth will review and respond to your request within a reasonable period of time.

#### **6.10 Mentioned organisations, companies etc.**

In this data protection declaration, organizations and companies are mentioned or described by name. Since 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 found at any time at [perpetual-wealth.ch](http://perpetual-wealth.ch).

#### **6.11 Contact**

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

Perpetual Wealth AG  
Strehlgasse 33  
8001 Zurich

December, 2021