ONLINE PRIVACY STATEMENT

This Online Privacy Statement ("Privacy Statement") applies to the Masttro website located at http://www.masttro.com/ operated by Masttro Holdings AG ("Masttro") and any Masttro interface that links to this Privacy Statement (each, a "Site" and collectively, the "Sites"). This Privacy Statement addresses Masttro's practices regarding information collected from visitors to the Site (sometimes referred to as "you" or "your").

If you have any questions concerning this Privacy Statement, please email Masttro at support@Masttro.com.

1. Collection of Personal Information from Site Users. Like many websites, this Site actively collects information from its visitors both by asking for specific information and by permitting you to communicate directly with us via email or feedback forms. Some of the information that you submit to us may be personally identifiable information ("Personal Information"), such as your name, address, email address, phone number, and financial account number.

If you register to set up an account with us, you will be asked to provide Personal Information, including your name, postal address, email address, telephone number, and date of birth. On the registration screens, we indicate which information is required for registration and which information is optional. Once you register for an account, you and your team may voluntarily enter estate documents and information, including information about financial and non-financial assets, to use the services available through the Site. As part of the services available through the Site, you may authorize financial institutions to deliver data feeds to your account.

If you choose to sign up to allow family members, professional advisors, or other contacts (a "Designated Representative") to access your account, you may be asked to enter Personal Information about such Designated Representative so that we may contact him or her to invite him or her to register as an authorized Designated Representative on your account. By sharing information about a Designated Representative with Masttro, you represent and warrant that you have all necessary legal right and authority to share such information with Masttro.

Masttro may also use Internet cookies and other technologies to gather, store, and track certain information related to your visit to and activity on the Site, such as your Internet Protocol (IP) address, browser type, operating system, Internet Service Provider (ISP), time stamps, transactions placed, and services used.

2. Use of Personal Information Collected. Personal Information collected by Masttro may be used by Masttro for limited purposes, including to establish and set up your account, to issue you an account number and secure password, to provide you with the specific services you select, to inform you of changes to this Privacy Statement, and for other purposes specified at the point of collection. We may also use the information that we collect from you to improve the Site and our services, to customize your experience on the Site, for our recordkeeping and legal purposes, and to improve the Site's content, security, navigation, and usability. From time to time, Masttro may

need to contact you regarding your account and the services that we provide to you. You agree that Masttro may use your Personal Information for such contact with you.

3. Disclosure of Personal Information to Third Parties. Except as specifically set forth herein, any Personal Information that you provide to Masttro through the Site will not be disclosed to third party entities not affiliated with Masttro. Your Personal Information and data, whether personally identifying or not, may be disclosed to:

● any family member, professional advisor, or other individual who you have designated as an Designated Representative of your account,

● affiliates of Masttro if required to provide a product or service you have requested, provided such affiliates agree to use and disclose such information according to this Privacy Statement,

● a vendor or service provider that we engage to help carry out certain functions on behalf of Masttro, provided such vendors or service providers agree to use and disclose such information only to provide such services and according to this Privacy Statement,

● a party with which Masttro enters or reasonably may enter into a corporate transaction, such as, for example, a merger, consolidation, acquisition, or asset purchase, provided such party contractually agrees to abide by the terms of this Privacy Statement, or

● a third party pursuant to a subpoena, court order, or other form of legal process, in response to a request by or on behalf of any local, state, federal, or other government agency, department, or body, whether or not pursuant to a subpoena, court order, or other form of legal process, or if determined by Masttro in its sole judgment that such disclosure or distribution is appropriate to protect the life, health, or property of Masttro or any other person or entity, provided that Masttro will give prompt notice to you upon learning of any such disclosure obligation and shall only disclose the minimum amount of information necessary.

4. Security Measures. Masttro employs technical, physical, and administrative security controls that comply with applicable laws. If you are a registered user of an account with Masttro, that account is a private, restricted-access, Internet-based service. We use encryption technology to protect transmission of account data to or from you via the Site and all account data is stored in encrypted form. Nevertheless, because this information is transmitted over a public network, there can be no guarantee that your account information will always remain secure. You are responsible for maintaining the confidentiality and security of your password, your electronic devices, and your encryption key. If you believe that an unauthorized person has accessed your information, please contact Masttro immediately.

5. Global Transfers. By registering for an account with us, you consent to the transfer of the personal information we collect through the Sites to other countries where we operate, which may not have the same data protection laws as the country in which you reside.

6. Access to and Ability to Correct Personal Information; Contacting Masttro. You may review, change, or correct your Personal Information at any time. You are responsible for maintaining the accuracy and completeness of your personal and other information. If you have any questions or concerns regarding this Privacy Statement, or your Personal Information, please contact Masttro at support@masttro.com

7. Protecting Children's Privacy Online. The Site is not directed to individuals under the age of thirteen (13), and we request that these individuals do not provide Personal Information through the Site. We do not knowingly collect information from children under 13 without parental consent.

8. Additional Information for Personal Information Subject to the General Data Protection Regulation. If you are residents of the European Economic Area ("EEA") you have certain rights pursuant to the General Data Protection Regulation ("GDPR"). If you are an EEA resident and do not agree with Masttro's use of your personal data as set forth in this Privacy Statement, you should not submit your personal information to Masttro. However, if you do not submit your personal information, or if you exercise your rights to prevent us using your data, you should be aware that Masttro may not be able to do business with you.

For the purposes of data privacy legislation, Masttro is a "controller." We transfer, use and/or store your personal information outside of the EEA, primarily in Switzerland, and the laws of Switzerland and certain other destination countries may not offer the same standard of protection for personal information as countries within the EEA. It may also be processed by staff operating outside the EEA who work for us or for one of our vendors (for example, those who supply support services to us).

a) *Our bases for collecting and using personal information.* We are entitled to use your personal data in the ways set out in this policy on the following bases:

- the use of personal data is necessary for the performance of a contract with you for provision of our products and/or services (including client agreements) or to take steps at your request prior to entering into such a contract;

- we have legal obligations that we have to discharge (including legal obligations set forth in client agreements);

- you have consented to such use; and/or

- to establish, exercise or defend our legal rights for the purposes of legal proceedings.

We do not expect to process "sensitive" or "special" categories of information under GDPR[1]; however, if we were to process such information, we would do so only where we have asked for

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[1] Sensitive/special categories of information include data concerning your health, personal data revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, or data concerning sexual orientation.

your explicit consent, or otherwise where this is necessary for the establishment, exercise or defense of legal claims, or as may otherwise be permitted under applicable law.

Provision of your personal information is a legal and contractual requirement necessary to becoming a client of Masttro. If you choose not to provide such information, we may not be able to perform some of the tasks we need to in order to provide certain services to you.

If you choose to provide your consent, you can withdraw it at any time by contacting us.

b) *Retention of Personal Information.* We will keep your information only for as long as necessary depending on the purpose for which it was provided. When determining the relevant retention periods, we take into account factors, including, but not limited to, the following:

- our contractual and business relationships with you;
- legal obligations under applicable law to retain data for a certain period of time;
- statute of limitations under applicable law(s);
- (potential) disputes; and
- guidelines issued by relevant supervisory authorities.

c) *Your rights in connection with personal information.* Under certain circumstances, by law you have the right to:

- Object to processing of your personal information where we are relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are processing it lawfully.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see above).

• Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

• Request the transfer of your personal information to another party in a machine-readable, commonly used and structured format.

If you want to exercise any of these rights, then please contact us using the details set forth at the end of this Privacy Policy. The various rights are not absolute, and each is subject to certain exceptions or qualifications. For example, if you wish to withdraw your consent or object to processing, we may need to discuss with you whether our use of your data needs to continue for other lawful purposes, such as fulfilment of a legal or contractual requirement.

Masttro will respond to your request within one month of receipt of your request. In some cases, we may not be able to fulfil your request to exercise the right before this date and may need to request more time. Where we cannot provide a full response to you for any reason, we will let you know about this in our initial reply to your request.

d) *Your duty to inform us of changes.* It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

e) Fees. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). In some cases, we may charge a reasonable fee if your request for access is clearly unfounded or excessive, or if you request multiple copies of the information. Alternatively, we may refuse to comply with the request in such circumstances.

f) *What we may need from you.* To access your personal information (or to exercise any of the other rights), we may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

g) Right to complain. If you wish to request further information about any of the above rights, or if you are unhappy with how we have handled your information, contact us. If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with GDPR or other applicable data protection law, you can make a complaint to the supervisory authority in your country. For example, in the UK you should contact the Information Commissioner's Office: https://ico.org.uk/global/contact-us/ or 0303 123 1113.

9. Right to Change Privacy Statement. Masttro reserves the right at any time to modify, alter or update this Privacy Statement. Your use of the Site following any changes means that you agree to follow and be bound by the Privacy Statement as changed. Any change to this Privacy Statement shall be effective as to any visitor who has visited the Site before the change was made. It is the

obligation of users visiting the Site before the change to learn of changes to the Privacy Statement since their last visit.

Dated: May 25, 2018
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