

Data Protection and Privacy Policy

Mingke International Ltd.

Swiss registered entity: Mingke International AG

This English-language version is provided for informational purposes. The German-language version shall prevail and shall be authoritative and binding.

Table of Contents

1.	WHAT IS THIS PRIVACY POLICY ABOUT?	3
2.	WHO IS RESPONSIBLE FOR PROCESSING YOUR DATA?	3
3.	FOR WHAT PURPOSES DO WE PROCESS WHICH OF YOUR DATA?	3
4.	WHERE DOES THE DATA COME FROM?.....	5
5.	TO WHOM DO WE DISCLOSE YOUR DATA?	5
6.	IS YOUR PERSONAL DATA TRANSFERRED ABROAD?	5
7.	WHAT RIGHTS DO YOU HAVE?.....	6
8.	HOW ARE COOKIES, SIMILAR TECHNOLOGIES, AND SOCIAL MEDIA PLUG-INS USED ON OUR WEBSITE AND OTHER DIGITAL SERVICES?	6
9.	HOW DO WE PROCESS PERSONAL DATA ON OUR SOCIAL MEDIA PAGES?.....	7
10.	WHAT ELSE SHOULD YOU BE AWARE OF?	8
11.	CAN THIS PRIVACY POLICY BE CHANGED?	9
12.	WHICH LANGUAGE APPLIES?	9

1. WHAT IS THIS PRIVACY POLICY ABOUT?

Mingke International AG (hereinafter “Mingke”) is a service provider headquartered in Zurich. As part of our business activities, we collect and process personal data, in particular personal data about our customers, affiliated individuals, visitors to our website, event participants, newsletter recipients, and other entities, as well as their respective contact persons and employees (hereinafter “you”). In this Privacy Policy, we provide information about these data processing activities. In addition to this Privacy Policy, we may provide you with separate information regarding the processing of your data (e.g., in forms or contract terms).

If you provide us with data about other individuals (e.g., family members, representatives, or other related individuals), we assume that you are authorized to do so, that this data is accurate, and that you have ensured these individuals are informed of this disclosure to the extent that a legal obligation to inform applies (e.g., by providing them with this Privacy Policy in advance).

2. WHO IS RESPONSIBLE FOR PROCESSING YOUR DATA?

The entity responsible under data protection law for the processing described in this Privacy Policy is:

Mingke International AG
Bernerstrasse Sud 169, 8048 Zurich, Switzerland
Email: info@mingke.ch

3. FOR WHAT PURPOSES DO WE PROCESS WHICH OF YOUR DATA?

When you use our services, visit www.mingke.ch or other Mingke websites (hereinafter “Website”), or otherwise interact with us, we collect and process various categories of your personal data. In general, we may collect and otherwise process this data for the following purposes in particular:

- **Communication:** We process personal data so that we can communicate with you, as well as with third parties, other parties to proceedings, etc., via email, telephone, mail, or other means (e.g., to respond to inquiries, provide customer service, and initiate or process contracts). This also includes sending our customers, contractual partners, and other interested parties information about events, changes in the law, news about our offerings, or similar matters. This may take the form of newsletters and other regular communications (electronically, by mail, or by phone). You may opt out of such communications at any time, or refuse or withdraw your consent to receive them. For this purpose, we process, in particular, the content of the communication, your contact information, and the metadata associated with the communication, as well as video and audio recordings of video conferences, webinars, phone calls, or similar interactions. In the event of an audio or video recording, we will notify you separately, and you are free to end the communication or your participation. If we need or wish to verify your identity, we will collect additional data (e.g., a copy of an ID).
- **Initiating and Concluding Contracts:** In connection with the conclusion of a contract, we may, in particular, collect your name, contact information, powers of attorney, declarations of consent, information about third parties (e.g., contacts, family members), contract terms, the date of conclusion, creditworthiness data, and any other data that you provide to us or that we collect from public sources or from third parties (e.g., commercial registers, credit bureaus, sanctions lists, the media, or the Internet).
- **Contract Administration and Processing:** We collect and process personal data so that we can fulfill our contractual obligations to our customers and other contractual partners (e.g., suppliers, service providers, project partners) and, in particular, provide and claim contractual services. This also includes data processing for accounting and public communication (to the extent permitted). For this purpose, we process, in particular, the data we have received or collected in connection with the initiation, conclusion, and

execution of the contract, as well as data we generate in the course of our contractual services or that we collect from public sources or other third parties (e.g., credit reporting agencies, the media, or the Internet). This data may include, in particular, meeting minutes, notes, internal and external correspondence, contract documents, invoices, and financial and payment information.

- **Operation of Our Website:** To ensure the secure and stable operation of our website, we may collect technical data such as your IP address, information about your device's operating system and settings, your region, the time and nature of your use. We may also use cookies and similar technologies. For more information, see Section 8.
- **Improving Our Digital Services:** To continuously improve our website and other digital services, we may collect data about your behavior and preferences, for example, by analyzing how you navigate our website and how you interact with our social media profiles.
- **Registration:** To use certain offerings and services (e.g., intranet, free Wi-Fi, newsletters), you may need to register (directly with us, with our service partners, or through our external login service providers). To do so, we process the data you provide during the respective registration process. Furthermore, we may also collect personal data about you while you are using the offering or service; if necessary, we will provide you with additional information regarding the processing of this data.
- **Security purposes and access controls:** We collect and process personal data to ensure and continuously improve the appropriate security of our IT systems and other infrastructure. This includes, for example, monitoring and controlling electronic access to our IT systems (possibly also using methods that involve the processing of biometric data), analyzing and testing our IT infrastructure, conducting system and error checks, and creating backup copies. For documentation and security purposes (both preventative and to investigate incidents), we may also maintain access logs or visitor lists regarding our premises during events and may use surveillance systems (e.g., security cameras). We will notify you of such surveillance systems at the relevant locations through appropriate signage.
- **Risk Management and Corporate Governance:** We collect and process personal data as part of risk management (e.g., to protect against criminal activities) and corporate governance. This includes, among other things, our operational organization (e.g., resource planning) and corporate development (e.g., the acquisition and sale of business units or companies).
- **Job Applications:** When you apply for a position with us, we collect and process the relevant data for the purpose of reviewing your application, conducting the application process, and—if your application is successful—preparing and finalizing the corresponding contract. To this end, in addition to your contact information and the details from our correspondence, we process, in particular, the data contained in your application materials and any additional data we may collect about you—for example, from professional social networks, the Internet, the media, and references—provided you consent to our obtaining references.
- **Other Purposes:** Other purposes include, for example, training and educational purposes, as well as administrative purposes (e.g., accounting). We may monitor or record telephone or video conferences for training, evidentiary, and quality assurance purposes. In such cases, we will notify you separately (e.g., via a notification during the video conference in question), and you are free to inform us if you do not wish to be recorded or to end the communication (if you simply do not wish your image to be recorded, please turn off your camera). In addition, we may process personal data for the organization, conduct, and follow-up of events, including, in particular, participant lists and the content of presentations and discussions, as well as video and audio recordings made during these events. The protection of other legitimate interests also falls under the additional purposes, which cannot be listed exhaustively. We may also record our events (e.g., seminars) and make the recordings available to participants in connection with the organization of similar

and/or other events.

4. WHERE DOES THE DATA COME FROM?

- **From You:** Most of the data we process is provided to us directly by you (or your device) (e.g., in connection with our services, your use of our website and apps, or your communication with us). You are not obligated to provide your data, except in specific cases (e.g., legal obligations). However, if, for example, you wish to enter into contracts with us or use our services, you must provide us with certain data. Furthermore, using our website is not possible without data processing.
- **From third parties:** We may also obtain data from publicly available sources (e.g., debt collection registers, commercial registers, media, or the Internet, including social media) or receive it from (i) government authorities, (ii) your client, who has a business relationship with us or otherwise deals with us, as well as from (iii) other third parties (e.g., credit bureaus, address brokers, associations, contractual partners, web analytics services). This includes, in particular, the data we process in connection with the initiation, conclusion, and fulfilment of contracts, as well as data from correspondence and meetings with third parties.

5. TO WHOM DO WE DISCLOSE YOUR DATA?

In connection with the purposes listed in Section 3, we transfer your personal data in particular to the categories of recipients listed below.

- **Service Providers:** We work with service providers in Germany and abroad who process data—either (i) on our behalf (e.g., IT providers), (ii) jointly with us, or (iii) on their own behalf—that they have received from us or collected on our behalf. These service providers include, for example, event organizers or co-organizers, IT providers, banks, insurance companies, debt collection agencies, credit bureaus, address verification services, and consulting firms. These recipients generally process the data under their own responsibility.
- **Government Agencies and Courts:** We may disclose personal data to government agencies and other authorities in Switzerland and abroad if this is necessary to fulfill our contractual obligations, if we are legally obligated or authorized to do so, or if it appears necessary to protect our interests. These recipients generally process the data under their own responsibility.
- **Events:** During our events, participants in the same event may learn about the other participants.

All of these categories of recipients may, in turn, involve third parties, meaning that your data may also become accessible to them. We can restrict processing by certain third parties (e.g., IT providers), but not by other third parties (e.g., government agencies, banks, etc.).

We also allow certain third parties to collect personal data from you on our website and at events we host, acting on their own behalf and under their own responsibility (e.g., media photographers, providers of tools that we have integrated into our website, etc.). Unless we are significantly involved in this data collection, these third parties are solely responsible for it. If you have any concerns or wish to exercise your data protection rights, please contact these third parties directly. We have listed your rights in Section 7. Information regarding activities on our website can be found in Section 8.

6. IS YOUR PERSONAL DATA ALSO TRANSFERRED ABROAD?

We process and store personal data primarily in Switzerland and in the member states of the European Union (EU) or the European Economic Area (EEA). However, as part of our business activities—in particular to serve our customers and provide our services—we also transfer your personal data to other countries worldwide. Due to our customer

base, data may regularly be transferred to the People's Republic of China and Hong Kong, as well as to the United States through the use of certain IT service providers (see Section 8).

If a recipient is located in a country without adequate legal data protection (such as the People's Republic of China or the United States), we contractually oblige the recipient to maintain an adequate level of data protection. To this end, we use the Standard Contractual Clauses (SCCs) approved by the European Commission and recognized by the Federal Data Protection and Information Commissioner (FDPIC), including the necessary adaptations for Switzerland.

If a U.S. recipient is certified under the Swiss-U.S. Data Privacy Framework, we rely on this recognition of an adequate level of data protection.

We may disclose personal data to a country without an adequate level of data protection even without a separate agreement if we can rely on a statutory exception. This applies in particular to data transfers for the purpose of fulfilling a contract with you or carrying out pre-contractual measures (e.g., when providing services to customers), as well as in cases where you have given your explicit consent. We may also, under certain circumstances, rely on the exception for data from a legally established registry (e.g., a commercial register) to which we have been lawfully granted access.

7. WHAT ARE YOUR RIGHTS?

You have certain rights in connection with our data processing. In particular, under applicable law, you may request information about the processing of your personal data, have inaccurate personal data corrected, request the erasure of personal data, object to data processing, and request the provision of certain personal data in a commonly used electronic format or its transfer to other data controllers.

If you wish to exercise your rights with us, please contact us; our contact information can be found in Section 2. To prevent misuse, we must verify your identity (e.g., with a copy of your ID, if necessary).

Please note that these rights are subject to certain conditions, exceptions, or restrictions (e.g., to protect third parties or trade secrets, or due to our obligation to retain business records). We reserve the right to redact copies or provide only excerpts for data protection or confidentiality reasons. Please also note that we will charge you for any resulting expenses or any additional costs.

8. HOW ARE COOKIES, SIMILAR TECHNOLOGIES, AND SOCIAL MEDIA PLUG-INS USED ON OUR WEBSITE AND OTHER DIGITAL SERVICES?

When you use our website (including newsletters and other digital offerings), data is generated and stored in logs (particularly technical data). In addition, we may use cookies and similar technologies (e.g., pixel tags or fingerprints) to recognize website visitors, analyze their behavior, and identify their preferences. A cookie is a small file that is transmitted between the server and your system and enables the recognition of a specific device or browser.

You can configure your browser to automatically reject, accept, or delete cookies. You can also disable or delete cookies on a case-by-case basis. To learn how to manage cookies in your browser, consult your browser's help menu.

Neither the technical data we collect nor cookies generally contain any personal data. However, personal data that we or third-party providers commissioned by us store about you (e.g., if you have a user account with us or these providers, or if you use communication services such as WeChat) may be linked to the technical data or to the information stored in cookies and derived from them—and thus potentially linked to you personally.

We may also use social media plug-ins and communication widgets. These are small software components that establish a connection between your visit to our website and a third-party provider. The plug-in informs the third-party

provider that you have visited our website and may transmit cookies to the third-party provider that it has previously placed on your web browser. For more information on how these third-party providers use the personal data they collect via their plug-ins, please refer to their respective privacy policies.

In addition, we may use our own tools as well as third-party services (which may themselves use cookies) on our website, in particular to improve the functionality or content of our website (e.g., integration of videos, maps, or chat features), to compile statistics, and to display advertisements.

Currently, we may use services from the following providers and advertising partners in particular; their contact information and further details regarding their respective data processing practices are available in their respective privacy policies:

- **Google Analytics & Google Maps**
 - o Provider: Google Ireland Limited (Ireland) / Google LLC (USA)
 - o Privacy Policy: [google.com](https://policies.google.com/privacy)
 - o Transfers to third countries: Protected under the Swiss-U.S. Data Privacy Framework or standard contractual clauses.
- **WeChat / WeChat Out (Communication and Support Channels)**
 - o Provider: Tencent International Service Europe B.V. (Netherlands) / Tencent Holdings Ltd. (People's Republic of China)
 - o Privacy Policy: [wechat.com](https://wechat.com/privacy)
 - o Note for users from China/Hong Kong: Data processing is subject to the applicable provisions of the Chinese Cybersecurity Law (CSL) and the Personal Information Protection Law (PIPL).

Some of the third-party providers we use are located outside of Switzerland (specifically in the United States and the People's Republic of China). Information regarding the transfer of data abroad can be found in Section 6. From a data protection perspective, some of these providers may act on our behalf, while others may act as independent data processors. Further details on this can be found in the privacy policies of the respective providers.

9. HOW DO WE PROCESS PERSONAL DATA ON OUR SOCIAL MEDIA PAGES?

We may operate pages, official accounts, and other online presences on social networks, messaging apps, and other platforms operated by third parties, and in this context, we may process data about you. We do this to communicate with our customers, prospective customers, and partners—primarily in Europe and Asia (particularly the People's Republic of China and Hong Kong)—and to provide information about our services.

In doing so, we receive data from you (e.g., when you communicate with us directly through these channels, comment on posts, or fill out forms) and from the platforms themselves (e.g., anonymized usage statistics and demographic data). The platform providers analyze your usage and process this data together with other data they hold about you (e.g., behavioral data, preferences, location data). They also process this data for their own purposes (e.g., marketing and market research purposes and to administer their platforms) and act as independent data controllers for this purpose. For more information on processing by platform operators, please refer to the privacy policies of the respective platforms.

In particular, we may use the following platforms; the identity and contact information of the platform operator can be found in the linked privacy policy for each platform:

- **WeChat (Official Account / Channels)**
 - o Platform: wechat.com
 - o Privacy Policy: [wechat.com](https://wechat.com/privacy)
 - o Additional Note: For users within the People's Republic of China, the privacy policy of the Chinese domestic version (Weixin), operated by the Tencent Group in China, applies.

- **LinkedIn**
 - o Platform: linkedin.com
 - o Privacy Policy: linkedin.com
- **Facebook & Instagram**
 - o Platform: facebook.com / instagram.com
 - o Privacy Policy: facebook.com
- **YouTube**
 - o Platform: youtube.com
 - o Privacy Policy: google.com
- **X (formerly Twitter)**
 - o Platform: x.com
 - o Privacy Policy: x.com

We have the right, but without obligation, to review third-party content before or after it is published on our online platforms, to delete content without notice, and, if necessary, to report it to the provider of the relevant platform.

Some of the platform operators may be located outside of Switzerland (particularly in the United States and the People's Republic of China). Information regarding the transfer of data abroad and the protective measures taken can be found in Section 6.

10. WHAT ELSE SHOULD BE NOTED?

We do not believe that the EU General Data Protection Regulation ("GDPR") applies in our case. However, should this apply in exceptional cases to certain data processing activities, this Section 10 shall apply exclusively for the purposes of the GDPR and the data processing activities governed by it.

We base the processing of your personal data in particular on the fact that:

- it is necessary, as described in Section 3, for the initiation and conclusion of contracts and for their administration and enforcement (Art. 6(1)(b) GDPR);
- it is necessary to protect our legitimate interests or those of third parties as described in Section 3, namely for communicating with you or third parties, to operate our website, to improve our electronic offerings, and to register for certain offers and services; for security purposes, to comply with Swiss law and internal regulations, for our risk management and corporate governance, and for other purposes such as training and education, administration, evidence retention and quality assurance, the organization, conduct, and follow-up of events, and to safeguard other legitimate interests (see Section 3) (Art. 6(1)(f) GDPR);
- it is required or permitted by law based on our mandate or status under the law of the EEA or a Member State (Art. 6(1)(c) GDPR) or is necessary to protect your vital interests or those of other natural persons (Art. 6(1)(d) GDPR);
- you have separately consented to the processing, for example, through a corresponding declaration on our website (Art. 6(1)(a) and Art. 9(2)(a) of the GDPR).

Please note that, as a general rule, we process your data for as long as required by our processing purposes (see Section 3), statutory retention periods, and our legitimate interests—in particular for documentation and evidentiary purposes—or as long as storage is technically necessary (e.g., in the case of backups or document management systems). Unless there are legal or contractual obligations or technical reasons preventing us from doing so, we generally delete or anonymize your data after the retention or processing period has expired, as part of our standard procedures and in accordance with our retention policy.

If you do not provide certain personal data, this may result in our inability to provide the related services or to enter into a contract. We generally indicate where the personal data we request is mandatory.

The right to object to the processing of your data, as set forth in Section 7, applies in particular to data processing for direct marketing purposes.

If you disagree with how we handle your rights or data protection, please let us know (see contact information in Section 2). You also have the right to file a complaint with the competent supervisory authority. For Switzerland, this is the [Federal Data Protection and Information Commissioner \(FDPIC\)](#); for individuals in the EEA, it is the relevant national data protection authority (a list can be found at <https://edpb.europa.eu>).

11. CAN THIS PRIVACY POLICY BE CHANGED?

This Data Protection and Privacy Policy is not part of a contract with you. We may update it at any time. The version published on our website is the current version.

12. WHICH LANGUAGE IS AUTHORITATIVE?

We publish this Data Protection and Privacy Policy in German and English. The German-language version shall prevail and shall be authoritative and binding. The English-language version is provided for informational purposes only, without any guarantee as to its timeliness, completeness, or accuracy.

Zurich, August 1, 2026

Mingke International AG