

Privacy Policy

August 2025

RMS - Risk Management Services (**“RMS,” “we,” “us,” or “our”**) is a fund management firm combining **Artificial Intelligence (AI)** and **Behavioral Intelligence** to trade with precision and purpose - managing your investments with care, insight, and discipline. We are committed to protecting your privacy and handling personal data lawfully, fairly, and transparently. This Privacy Policy explains how we collect, use, disclose, protect, and retain personal data when you visit our websites, contact us, or use our services (collectively, the **“Services”**).

For all privacy inquiries or to exercise rights, email us at info@rms.fund

If you are an institutional or enterprise client: When RMS processes personal data **on your instructions** (e.g., under an investment or technology services agreement), RMS acts as a **processor/service provider**. In that case, our **Data Processing Addendum (DPA)** governs and prevails over this Policy to the extent of any conflict.

1) Scope & Audience

This Policy applies to:

- Website visitors, prospective clients, investors/beneficial owners, authorized signatories, and persons who communicate with us;
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- Natural persons whose data we process as part of onboarding (KYC/AML), account servicing, investor relations, risk/compliance, and marketing;
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- Job applicants.

This Policy is designed to reflect requirements under: **GDPR/UK GDPR/Swiss FADP, CPRA (California) and other US state privacy laws, LGPD (Brazil), POPIA (South Africa), PDPA (Singapore), DIFC DP Law/ADGM DPR (UAE), DPDP Act (India), PIPEDA (Canada), Australian Privacy Principles**, among others.

2) How We Collect Personal Data

(A) Direct from you: forms, onboarding/KYC, subscription/agreements, meetings/calls, events, email/chat.

(B) Automatically: cookies, pixels, SDKs, server logs, device data, session data, and analytics.

(C) Third parties: KYC/AML vendors, sanctions and PEP screening lists, fraud-prevention services, credit/identity bureaus (where lawful), placement agents, introducing brokers, fund administrators, custodians, banks, auditors, professional advisors, public records, social/professional networks (where you make info public).



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3) Categories of Personal Data We Process

- **Identifiers & Contact:** name, aliases, ID numbers, signature, address, email, phone, nationality, date/place of birth.
- **KYC/AML & Compliance:** government IDs, residency/immigration status (where lawful), source of funds/wealth, occupation, employer, tax IDs, sanctions/PEP screening results, adverse media checks.
- **Financial & Transactional:** bank and payment details, holdings and transactions, subscriptions/redemptions, risk profile, investment preferences, suitability information.
- **Online & Technical:** IP address, device IDs, OS/browser, pages viewed, timestamps, referrers, session telemetry; cookie IDs; advertising identifiers; approximate location inferred from IP.
- **Communications:** emails, calls/voicemails (where legally permitted and notified), chat transcripts, meeting notes.
- **Marketing & Events:** preferences, opt-in/opt-out status, campaign engagement.
- **Sensitive/Special Categories (processed only where lawful & necessary):** Biometric identifiers used for e-KYC (if any), criminal checks (for AML/fit-and-proper where permitted), data revealing political opinions **only to the extent necessary for PEP determination**, and any diversity data you voluntarily provide (e.g., in recruitment) subject to consent or other lawful basis.
- **Inference Data:** profiles/segments derived from behavioral signals to tailor Service experiences.

We do not collect precise geolocation, genetic data, or health data in the ordinary course of providing the Services.

4) Purposes & Legal Bases (GDPR/UK/CH)

We process personal data for:

Client onboarding & account servicing: Identity verification, suitability, KYC/AML, risk assessment, funding/withdrawals, reporting (Contract, Legal Obligation).

Regulatory compliance & audits: Sanctions/PEP screening, transaction monitoring, record-keeping (Legal Obligation, Public Interest where applicable).



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- **Service delivery & operations:** Portfolio management, trade execution, reconciliation, incident response, support (Contract, Legitimate Interests).
- **AI- & behavior-driven insights:** Improving models, strategy selection, personalization, fraud prevention (Legitimate Interests; Consent where required).
- **Marketing & communications:** Newsletters, events, product updates (Consent or Legitimate Interests with opt-out).
- **Security & fraud prevention:** Anomaly detection, access controls, system monitoring (Legitimate Interests, Legal Obligation).
- **Legal claims, enforcement, and risk management:** Establishment, exercise, or defense of claims (Legitimate Interests).

Where we rely on consent, you may withdraw it at any time (this won't affect prior lawful processing).

5) Notice at Collection (CPRA) – Categories, Purposes, Retention

RMS does **not** “sell” personal information for monetary consideration, and we do not share personal information for cross-context behavioral advertising. If this changes, we will update this Policy and provide the legally required opt-out links.

We may collect and process the following categories of personal information for the business or commercial purposes described below, and we retain such information for the durations specified:

- **Identifiers** – such as your name, postal address, email address, telephone number, and government identification numbers.

Purpose: Used for client onboarding, account servicing, compliance, and communications.

Retention: For the life of the client relationship and thereafter for applicable legal retention periods.

- **Sensitive Personal Information** – including government-issued identification numbers, biometric data (if used for e-KYC), and similar information.

Purpose: Used strictly for identity verification, anti-money laundering, and other compliance purposes.

Retention: As required under AML/KYC laws, typically between 5–10 years after the client relationship ends.



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- **Financial Information** – such as bank account details, transaction histories, and investment holdings.

Purpose: Used for processing subscriptions and redemptions, producing reports, and fulfilling regulatory audit requirements.

Retention: For statutory accounting, tax, and audit periods, generally 7–10 years.

- **Internet or Network Activity Information** – such as IP address, device identifiers, server logs, and analytics data.

Purpose: Used for website security, fraud prevention, performance monitoring, and analytics.

Retention: Typically retained for 13–36 months, depending on the purpose and analytics requirements.

- **Professional or Employment Information** – such as your occupation and employer details.

Purpose: Used for suitability assessments and KYC verification.

Retention: For the duration of the client relationship plus any legally mandated AML retention period.

- **Inferences** – including profiles or segments derived from behavioral or transactional data to help personalize services or perform security screening.

Purpose: Used to improve service relevance, enhance account security, and refine investment strategies.

Retention: Generally retained on a rolling 24-month basis unless required longer for security or compliance purposes.

6) Automated Decision-Making, AI & Behavioral Intelligence

We use AI models and behavioral analytics to support trading strategies, detect anomalous activity, and enhance client experience.

- **What this means:** We analyze signals (e.g., session telemetry, transaction patterns) to help secure accounts, personalize content, and improve investment operations.

- **Solely automated decisions with legal/similar significant effects:** RMS does not rely solely on automated decision-making for decisions that produce legal or similarly significant effects about you without human involvement. If this changes, we will: (i) explain the logic, (ii) describe significance and consequences, and (iii) provide a way to request human review, express your view, and contest the decision, as required under GDPR/UK GDPR/Swiss FADP and certain US/EU laws.

- **Model improvement:** Where permitted, we may use pseudonymized client event data for model evaluation and improvement with strict access controls; you can object where applicable.



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7) Disclosures of Personal Data

We disclose personal data to:

- **Intra-group entities** (where applicable) for centralized operations and compliance;
- **Fund administrators, custodians, banks, brokers, and trading venues** to deliver the Services;
- **Compliance/KYC/AML providers**, sanctions/PEP screening suppliers, fraud-prevention services;
- **Professional advisors** (law, audit, tax), insurers;
- **IT & cloud vendors** (hosting, storage, ticketing, email, CRM, analytics, communications);
- **Regulators, courts, law enforcement** (when legally required);
- **Prospective/actual buyers** in M&A/financing, under confidentiality.

We require recipients to implement appropriate confidentiality and security controls and to process data only for specified purposes.

We do not allow third parties to use your data for their own marketing without your consent.

8) International Data Transfers

Your data may be transferred to, and processed in, countries outside your own (including outside the EEA/UK/Switzerland). Where we transfer personal data internationally, we use appropriate safeguards, such as:

- **EU/UK Standard Contractual Clauses** (and UK Addendum/IDTA);
- **Swiss-adapted SCCs** per FDPIC guidance;
- **Adequacy decisions** (where available);
- Additional **technical and organizational measures** (encryption in transit/at rest, access controls, minimization).

Copies of the relevant safeguards can be requested via info@rms.fund

(redactions may apply for security/confidentiality).



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9) Retention

We keep personal data **only as long as necessary** for the purposes in this Policy, including to meet legal, tax, accounting, AML/KYC, and regulatory obligations, to resolve disputes, and to enforce agreements. Typical periods:

- **KYC/AML records:** 5–10 years after the end of the client relationship (jurisdiction-dependent).
- **Transaction, accounting & tax records:** 7–10 years.
- **Marketing & analytics data:** 13–36 months from last interaction or opt-out.
- **Support tickets/communications:** up to 6 years (or longer for legal holds).

When no longer required, we delete or irreversibly anonymize data.

10) Your Privacy Choices

- **Marketing:** You can opt out via unsubscribe links or by contacting us.
- **Cookies/Tracking:** Manage preferences in our Cookie Banner and browser settings.
- **AI Personalization:** Where applicable law provides, you may object to processing for profiling/analytics.
- **Do Not Track/Global Privacy Control:** We honor GPC signals for applicable jurisdictions.

11) Cookies, Analytics & Online Identifiers

We use first- and third-party cookies and similar technologies (e.g., pixels, SDKs, local storage) for:

- **Strictly Necessary:** site security, authentication, load balancing;
- **Performance/Analytics:** traffic measurement, diagnostics, feature usage;
- **Functionality:** remembering preferences;
- **Advertising (if enabled):** audience measurement and reach reporting (not cross-context behavioral ads in California unless we update this Policy and provide opt-outs).

You can adjust preferences via our Cookie Settings link in the footer. Blocking some cookies may impair site functionality.



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12) Security

We implement administrative, technical, and physical safeguards appropriate to the risk, including:

- Encryption in transit and at rest;
- Network segmentation, firewalls, endpoint protection, and secrets management;
- Role-based access controls, MFA, least-privilege principles, vendor due diligence;
- Secure software development life cycle (SSDLC), code reviews, vulnerability management;
- Logging/monitoring, incident response, and employee privacy/security training.

No system is 100% secure. If we reasonably believe a breach occurred, we will notify affected individuals and regulators in accordance with applicable law (e.g., GDPR 72-hour notification).

13) Your Rights

Your rights depend on your location and applicable law. Subject to limitations and verification, you may request:

- **Access** (know whether we process your data and obtain a copy);
- **Correction** (rectify inaccurate/incomplete data);
- **Deletion/Erasure**;
- **Restriction** of processing;
- **Portability** (structured, commonly used, machine-readable format);
- **Objection** to processing (including profiling/analytics/marketing) where based on legitimate interests or public interest;
- **Withdraw consent** (where processing relies on consent);
- **Appeal** a refusal (certain US states);
- **Opt-out** of targeted advertising, certain profiling, and sale/sharing (US state laws—RMS does not sell/share as defined; if this changes, we'll provide links).



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How to exercise: Email info@rms.fund or call **+41 33 822 40 42**. We may need to verify your identity. You may use an authorized agent (CPRA) with proof of authorization. We do not discriminate against you for exercising your rights.

14) Children's Privacy

Our Services are not directed to children and are intended for individuals 18+. We do not knowingly collect personal data from children. If you believe a child provided data, contact us to delete it.

15) Recruitment Privacy (Applicants)

If you apply for a role at RMS, we process applicant data (CV, contact details, qualifications, interview notes, references, background checks where lawful). Applicant records are typically retained for 12–24 months (or longer where required by law or with consent to keep you in talent pools).

16) Third-Party Links & Social Media

Our sites may link to third-party websites, plug-ins, or social media platforms. RMS is not responsible for their privacy practices. Review their policies before providing data.

17) International Users

By interacting with our Services, you understand your data may be processed in countries with privacy laws different from your own.

18) Changes to This Policy

We may update this Policy periodically. The “Last Updated” month reflects the latest version. Material changes will be highlighted on our website and, where required, we will seek your consent.

19) How to Complain

If you have privacy concerns, please contact us first at info@rms.fund or **+41 33 822 40 42**.

20) Your Controls & Operational Details (Quick Reference)

- **Submitting a Request:** info@rms.fund | **+41 33 822 40 42**
- **Identity Verification:** we may ask for information to verify you (e.g., contact points, transaction details, ID where lawful).
- **Agent Requests:** provide written authorization and proof of identity.
- **Response Times:** we endeavor to respond within **one month** (GDPR/UK/CH) and **45 days** (CPRA), extendable as allowed by law.



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- **Fees:** ordinarily no charge unless requests are manifestly unfounded/excessive.
- **Record-Keeping:** we log rights requests to meet legal obligations.

21) Definitions (Plain Language)

- **“Personal data/Personal information”:** any information that identifies or can reasonably be linked to a person.
- **“Processing”:** any operation on personal data (collection, storage, use, disclosure, etc.).
- **“Controller/Responsible Party”:** decides why/how data is processed.
- **“Processor/Service Provider/Operator”:** processes data on behalf of a controller.
- **“Sell/Share” (CPRA):** has specific legal meanings; RMS does not sell/share as defined.
- **“Sensitive” data:** includes gov’t IDs, biometrics, precise geolocation, etc., varying by law.
- **“Profiling/Automated decision-making”:** evaluating aspects of a person, sometimes using algorithms/AI.

22) Contact

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