



FORM ADV PART 2A - SEC

Investment Advisory Filing Brochure

Swiss Finance Management International SA

(Previously LCJ Investments SA)

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Switzerland

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CRD Number 284408

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This brochure provides information about the qualifications and business practices of Swiss Finance Management International SA ("SFMI", "us", "we", "The Company", or the "Firm").

If you have any questions about the contents of this brochure, please contact us at info@swissfim.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about SFMI is also available on the SEC's website at: www.adviserinfo.sec.gov.

Registration as an Investment Adviser does not imply that SFMI or any of its principals or employees possesses a particular level of skill or training in the Investment Advisory business or any other business.

Swiss Finance Management International SA

Asset Management Firm Regulated by FINMA, the Swiss Financial Regulator

VAT Number: CHE-113.780.164

Rue Maurice 1-3, 1204 Geneva, Switzerland



Item 2: Material changes

This is the annual update to the Firm's brochure as required by the SEC.

Since the last brochure, *LCJ Investments SA* has been legally renamed and is now known as *Swiss Finance Management International SA* ("*SFMI*"). The renaming of the entity has been approved by FINMA, the Swiss regulator. This has been notified to the FINRA through annual filing requirements as an Investment Adviser

The Firm has also been purchased (80%) by a Swiss Company, Swiss Finance Management SA, this was also approved by FINMA, the Swiss regulator. This has also been notified to the SEC through annual filing requirements. This has been notified to the FINRA through annual filing requirements as an Investment Adviser

Item 3: Table of Contents

Item 2: Material changes	2
Item 3: Table of Contents	3
Item 4: Advisory Business	4
Item 5: Fees and Compensation	5
Item 6: Performance Based Fees and Side-by-Side Management	6
Item 7: Types of Clients	7
Item 8: Asset Management and Risk of Loss	7
Item 9: Disciplinary Information	12
Item 10: Other Financial Industry Activities and Affiliations	12
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	12
Item 12: Brokerage Practices	15
Item 13: Review of Portfolios	16
Item 14: Client Referrals and Other Compensation	17
Item 15: Custody	17
Item 16: Investment Discretion	18
Item 17: Voting Client Securities	18
Item 18: Financial Information	18
Annex 1 – SFMI Privacy Policy	19
Annex 2 – Form ADV Part 2B – SFMI Investment Advisory Personnel	21

Item 4: Advisory Business

SFMI Investments S.A. (“SFMI”, “us”, “we”, “The company”, or the “Firm”) was founded in 2007 and is owned by management. Swiss Finance Management International SA (“SFMI”) holds 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. And, the Asset Manager is supervised by the supervisory organization, OSIF - Organisme de Surveillance des Instituts Financier.

Switzerland has adopted the Federal Act on Financial Services (FinSA) and its implementing ordinance (FinSO). They entered into force on January 1, 2020. This legislation aims to improve investor protection.

SFMI is subject to this law insofar as it carries out asset management and investment advisory services.

Mediation Body

Financial service providers such as SFMI, must be affiliated to an ombudsman's office. Disputes regarding legal claims between the client and the financial service provider should be settled by an ombudsman in mediation proceedings if possible, which does not exclude legal proceedings. The mediation process is fair, expeditious, impartial and inexpensive for the client, if not free of charge.

The Company is affiliated with the following ombudsman's office:

Name: Terraxis SA

Address: Rue de la tour de l’Ile 1, 1204 Genève, Switzerland

Phone: +41 22 732 61 19

SFMI currently employs 9 staff, 5 of these are involved in Investment Advisory functions.

With a solid expertise in the financial market, Swiss Finance Management International SA is an external asset management company that offers a wide range of financial services for UHNWIs and institutions.

SFMI work with a wide variety of clients, from HNWIIs to corporations and financial institutions.

Our services are tailored to each client’s needs, whether they involve wealth management, short-term investments or long-term investment strategies.

SFMI does not participate in any wrap fee programs.

As at March 2024 SFMI manages circa \$26 million of assets on a discretionary basis.

SFMI currently has no assets under management on a non-discretionary basis.

Item 5: Fees and Compensation

Management Fees

The Firm charges each client a management fee.

The management fee covers the services provided by SFM for asset management. It does not include custody account fees, stock exchange brokerage fees, stock exchange duties and stamp duties as well as all other duties and expenses charged by third parties, which are charged directly or separately to the Client.

The basis for calculating the management fee is the sum of the assets managed by SFM under this agreement at the end of the last banking day of the quarter.

The fee schedule varies between Accounts. A summary of the current fee schedule is set out below:

SFMI Management Fee range: 1% - 2%

Fee Compensation by third parties

SFM receives remuneration from third parties, in particular from the fund management companies of the funds and from the issuers of structured products in which investments are made, for the allocation of investments in their products. The reimbursements may be in the form of a trailer fee or an acquisition fee/fee within the following limits:

- Brokerage: The standard commission is 1%, with a maximum of 1% on third-party fees.
- Structured Products: The standard commission is 1.5%, with a maximum of 1.5% on third-party fees.
- Alternative Investments: The standard commission is 1.5% with a maximum of 1.5% on third-party fees.
- Real Estate Investments: The standard commission is 2%, with a maximum of 2% on third-party fees.

These fees in total can amount up to 2% of the client's total assets under management (AUM).

The Firm communicates and is fully transparent with the client in regards these fees and as such the additional remuneration is retained by SFMI to the extent that it is permitted to retain such payments under applicable law.

SFMI shall ensure that any resulting potential conflicts of interest (e.g. regarding the selection of investment products, etc.) are not detrimental to the Account Holder. An explanation of the measures taken can be found in the Firm's "Information Sheet".

Research fees

SFMI does not pay research fees to third parties.

Other fees and expenses

Client assumes additional fees, costs and taxes

In addition to the aforementioned remuneration, the Client may incur further fees and costs charged by the custodian bank for the safekeeping or the acquisition or disposal of financial instruments, as well as other fees and taxes levied by the markets on which the transactions are carried out, stamp duties and other foreign taxes and duties of a comparable nature. These fees, charges and taxes are not borne by the Asset Manager. The Asset Manager refers the Client to the respective custodian bank for information regarding these costs.

Item 6: Performance Based Fees and Side-by-Side Management

The Firm is entitled to receive a performance allocation with respect to the portfolio, on the annual performance above 6% increase of the total assets managed. In the event of negative performance, this fee will not be charged until the assets have returned to the level they had at the time of the last profit sharing.

The performance allocations are charged in compliance with Rule 205-3 of the Investment Advisers Act of 1940, as amended (the "Advisers Act"). Any performance allocations in respect of the portfolios are negotiated on a case by case basis.

The performance based fees for Portfolios are as follows:

SFMI Discretionary Portfolio: 15% performance fee payable with high watermark (see above)

No other hourly, flat, or asset-based fees are charged to the Portfolio.

Item 7: Types of Clients

The Firm provides its services to institutional clients, professional clients and high-net-worth clients

The Asset Manager essentially carries out the following activities:

1. Asset management for private institutional and professional clients;
2. Investment advisory services for private institutional and professional clients

Item 8: Asset Management and Risk of Loss

Asset Management

In asset management, the asset manager manages, in the name, for the account and at the risk of the client, assets which the client has deposited with a custodian bank. The asset manager carries out transactions at his own discretion and without consulting the client.

In doing so, the asset manager 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.

The asset manager selects the investments within the framework of the considered market offer to be included in the portfolio with due care. The asset manager shall ensure an appropriate distribution of risk to the extent permitted by the investment strategy. He 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.

The asset manager shall regularly inform the client about the asset management agreed on and provided to the client.

Risk of Loss Factors

Clients should consider the following factors before investing in any of the investments referred to in this Brochure. The following list of risk factors does not purport to be a complete enumeration or explanation of the risks involved in an investment.

Asset management basically involves the following risks, which are in the client's sphere of risk and are therefore borne by the client:

- Risk of the selected investment strategy: Various risks may arise from the investment strategy selected and agreed by the client. The client bears these risks in full. An overview of the risks and a corresponding risk explanation are provided before the investment strategy is agreed on
- Asset 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.

The brochure is available on the Internet under the online link :

"SBA_Risks_Involved_in_Trading_Financial_Instruments_2019_EN.pdf
(swissbanking.ch)".

- Information risk on the part of the asset manager or the risk that the asset manager has too little information to be able to make an informed investment decision: When managing assets, the asset manager considers the client's financial circumstances and investment objectives (suitability test). If the client provides the asset manager with insufficient or inaccurate information about his financial circumstances and/or investment objectives, there is a risk that the asset manager 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 services within the framework of a long-term asset management relationship are deemed to be qualified investors within the meaning of the Collective Investment Schemes Act. Qualified investors have access to certain types of collective investment schemes which are exclusively open to them. This status allows a broader range of financial instruments to be considered 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, particularly regarding liquidity, investment strategy or transparency. Detailed information on the risk profile of a specific collective investment scheme can be found in the constituent documents of the financial instrument and, where applicable, in the key information document and the prospectus

- Furthermore, risks arise during asset management which lie within the risk sphere of the asset manager and for which the asset manager is liable vis-à-vis the client. The asset manager 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 the asset manager's sphere of influence, he shall ensure the best possible execution of client orders

Investment and Trading Risks in General

All investments involve risk, including the risk that the entire amount invested may be lost. The Funds invest in and actively trade financial instruments using investment techniques with risk characteristics, including risk arising from the volatility of the currency markets, potential illiquidity of instruments, and risk of loss from counterparty defaults. It should be remembered that the portfolio value may fall, and that investors may not get back the amount they have invested. Whilst it is the Firm's intention to implement strategies which are designed to minimize potential losses, there can be no assurance that these strategies will be successful.

Derivatives

Derivative instruments or "derivatives" include futures, forwards, options, swaps, structured securities and other instruments and contracts that are derived from, or the value of which is related to, one or more underlying securities, financial benchmarks, currencies or indices. Derivatives allow an investor to hedge or speculate upon the price movements of a particular security, financial benchmark currency or index at a fraction of the cost of investing in the underlying asset. The value of a derivative depends largely upon price movements in the underlying asset. Therefore, many of the risks applicable to trading the underlying asset are also applicable to derivatives of such asset. However, there are a number of other risks associated with derivatives trading, including liquidity risk and counterparty risk, depending on the creditworthiness of the trading partners.

Operational Risk

Operational risks include the possibility of errors in the confirmation, settlement, booking, evaluation, and accounting of transactions; other similar disruptions in operations may also lead to mistakes. These events may cause the investments to suffer financial loss, disruption of business, liability to clients or third parties, regulatory intervention, and reputational damage.

Risk Control Framework

No risk control system is fail-safe and no assurance can be given that any risk control framework will achieve its objectives. A risk control framework developed by the Asset Manager may be based on historical information for the securities and instruments in which he invests. No assurance can be given that such historical patterns will provide an accurate prediction of future patterns.

Substantial Changes in Regulation

The regulatory environment has undergone substantial change in recent years, and is expected to continue to change. This could add to the costs and regulatory burdens of operating in the future.

Investment advisory services

In providing comprehensive investment advice, the Company advises the client on transactions in financial instruments, considering the portfolio. To this end, the Company ensures that the recommended transaction corresponds to the financial circumstances and investment objectives (suitability test) 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 the Company.

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

The Company 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, the Company will recommend a corrective measure to the client.

The Company 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. In addition to the risks mentioned above in the context of asset management, there are, in principle, additional risks in the case of an advisory mandate which arise within the client's risk sphere and are therefore borne by the client:

- 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 the asset manager are 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
- Risk as a qualified investor in collective investment schemes: Clients who make use of asset management services within the framework of a long-term asset management relationship and/or comprehensive investment advice within the framework of a long-term investment advisory relationship are deemed to be qualified investors within the meaning of the Collective Investment Schemes. Qualified investors have access to specific types of collective investment schemes that are exclusively open to them. This status enables a broader range of financial instruments to be considered 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, particularly regarding liquidity, investment strategy or transparency. Detailed information on the risk profile of a specific collective investment scheme can be found in the constituent documents of the financial instrument and, where applicable, in the key information document and the prospectus.

Furthermore, comprehensive investment advice gives rise to risks which are in the sphere of risk of the Firm and for which the Firm is liable vis-à-vis the client. The Firm 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. Furthermore, the Firm ensures the best possible execution of client orders.

Item 9: Disciplinary Information

The Firm has not been subject to any disciplinary action, whether criminal, civil or administrative (including regulatory) in any jurisdiction. Likewise, no persons involved in the management of the Firm have been subject to such action.

Item 10: Other Financial Industry Activities and Affiliations

The Firm maintains a record of any potential conflicts of interest, including external appointments held by all staff. This list is updated when necessary and completeness is confirmed on an annual basis. None of the relationships notified to the Firm by the individuals concerned create a material conflict of interest between the Firm and its Clients or between Clients.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics & Personal Trading

The Firm has adopted a Code of Ethics and Employee Investment Policy that establishes various procedures with respect to investment transactions in accounts in which our employees or related persons have a beneficial interest or accounts over which an employee has investment discretion.

The foundation of the Code of Ethics and Employee Investment Policy is based on the underlying principles that:

- Employees must at all times place the interests of the clients first;
- Employees must make sure that all personal securities transactions are conducted consistent with the Code of Ethics and Employee Investment Policy; and
- Employees should not take inappropriate advantage of their position at SFMI.

All SFMI employees deemed to be “Access Persons” are required to adhere to a comprehensive Code of Ethics and Employee Investment Policy, which covers the duty of confidentiality as well as personal trading. All employees are required to certify their adherence to the Code of Ethics and Employee Investment Policy upon commencement of employment and quarterly thereafter.

In general, employees (and members of their immediate households) are permitted to invest in equities, options or futures, but are not permitted to replicate the Strategy of the Portfolios.

The spirit of the Code of Ethics and the Employee Investment Policy is to discourage frequent trading in employee personal accounts.

This policy does not apply to transactions involving government securities or open-end mutual funds, ETFs or other instruments which afford the investor no discretion over individual securities transactions.

Employees must also obtain approval from the CCO before engaging in any outside business activities or receiving an allocation of an Initial Public Offering (“IPO”).

Conflicts of interest may arise when the Asset Manager 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 the asset manager to carry out certain investment decisions, e.g. compensation from third parties
- The use of the asset manager's own products or those of third parties economically linked to him
- The coincidence of several client orders
- The coincidence of client orders with the asset manager's own transactions or those of his employees.

In order to identify conflicts of interest and prevent them from having a negative effect on the client, the asset manager has issued internal guidelines and taken organizational precautions:

- The Asset Manager has established an independent control function that continuously monitors the investments and transactions of the Asset Manager's employees as well as compliance with market conduct rules.
- When executing orders, the Asset Manager respects the principle of priority, i.e. all orders are immediately recorded in the chronological order of their receipt.
- The Asset Manager must request from his employees to disclose mandates that may lead to a conflict of interest.
- The Asset Manager must plan his remuneration policy in such a way as not to create incentives for behavior violating his contractual duties.

- The Asset Manager regularly trains his employees and ensures that they have the necessary knowledge.

Within the scope of the services provided to the client, the Company has identified a conflict of interest and informs its clients in a transparent manner:

- Remuneration received from third parties (see below).
- The investment of the Client's assets in any AMCs (Actively Managed Certificates) and funds, remunerated in addition to the asset management mandate.

Compensation by third parties in particular

The Company may accept compensation from third parties (e.g. brokerage fees, commissions, rebates, kickbacks, finder's fees, portfolio management commissions or other pecuniary advantages) that are connected to the provision of its financial services. The Company informs its clients in the mandates in full transparency of the amount received and ensures that their interests are protected in case of conflicts of interest.

Insider Trading Policies and Procedures

SFMI maintains Insider Trading policies and procedures (the “Insider Trading Policies”) that are designed to prevent the misuse of material, non-public information. Among other things, such policies seek to control and monitor the flow of inside information to and within SFMI, as well as prevent trading based on inside information. Accordingly, we may not have access to inside information that other market participants or counterparties are eligible to receive. On a periodic basis, our employees are required to certify to their compliance with the Compliance Manual, Code of Ethics and Employee Investment Policy, including the Insider Trading Policies.

Our Code of Ethics and Employee Investment Policy is available to clients upon request.

Privacy Policy

The Firm is committed to maintaining the confidentiality, integrity and security of our investor's personal information. It is our policy to collect only information necessary or relevant to our management business and use only legitimate means to collect such information. The Firm does not disclose any non-public personal information about clients or former clients to anyone except for servicing and processing transactions and as required by law. We restrict access to non-public personal information about clients to those employees with a legitimate business need for the information. We maintain security

practices, physical, electronic, and procedural safeguards to guard client's non-public personal information.

Our Privacy Policy is contained in Annex 1 of this Brochure.

Item 12: Brokerage Practices

As an adviser and a fiduciary to the portfolios, we require that the Clients' interests must always be placed first and foremost, and our trading practices and procedures prohibit unfair trading practices and seek to disclose and avoid any actual or potential conflicts of interests or resolve such conflicts in the Clients' favor. We have adopted the following policies and practices to meet the Firm's fiduciary responsibilities and to ensure our trading practices are fair to all Clients and that no Client is advantaged or disadvantaged over any other.

Aggregation

The aggregation or blocking of Client transactions allows an adviser to execute transactions in a more timely, equitable, and efficient manner and seeks to reduce overall commission charges to the Clients. Our policy is to aggregate Clients transactions where possible and when advantageous to the Clients. In these instances, Clients participating in any aggregated transactions will receive an average price and transaction costs will be shared equally and on a pro-rata basis.

Allocation

Our policy prohibits any allocation of trades in a manner that results in more favorable treatment for any Client.

We have adopted a policy for the fair and equitable allocation of transactions that generally analyses each trade, taking into consideration the specifics of each trade and the characteristics of each Client. To the extent that multiple Clients participate in a particular transaction such transaction will generally be allocated pro-rata among such Clients, unless facts specific to the transaction and Clients warrant an alternative allocation methodology.

Best Execution

As an Investment Advisory firm, we have a fiduciary duty to seek best execution for Client transactions. As a matter of policy and practice, we seek to obtain best execution for Client transactions, This is in most cases the responsibility of the Custodian bank.

SFMI and its partner Custodian banks, ensure in the execution of its clients' mandates that the best possible outcome is achieved in terms of cost, timing and quality.

Principal Trading

Our policy and practice is to not engage in any principal transactions.

Soft Dollars

The Firm is permitted to use “soft dollars” generated by trading activities to purchase research services or products that would otherwise have been an expense of SFMI. We intend to keep any such arrangements within the parameters of Section 28(e) of the United States Securities Exchange Act of 1934, as amended.

Generally, research services provided by broker-dealers may include information on the economy, industries, groups of securities, individual companies, statistical information, accounting and tax law interpretations, political developments, legal developments affecting portfolio securities, technical market action, pricing and appraisal services, credit analysis, risk measurement analysis, performance analysis, and analysis of corporate responsibility issues. Such research services are received primarily in the form of written reports, telephone contacts, industry conferences, and personal meetings with security analysts. In addition, such research services may be provided in the form of access to various computer-generated data, software, and meetings arranged with corporate and industry spokespersons, economists, academicians, and government representatives. The receipt of such research services (and brokerage) will be subject to, and limited by, prevailing interpretive guidance provided by the SEC as falling within Section 28(e).

Trade Errors

As a fiduciary, we have the responsibility to effect orders correctly, promptly and in the best interests of the Funds.

It is SFMI’s policy to have a professional and appropriate trade error Directive in place and to maintain an appropriate level errors and omissions or professional liability insurance coverage from an insurance company that has a minimum credit ratings of A-.

SFMI’s Trade Error Policy is available upon request.

It should be noted that it is the clients’ custodian bank that will ultimately be responsible for placing the orders in the market for the portfolio and hence their trade error policy would be applied.

Item 13: Review of Portfolios

We review the portfolio on a continual basis to assure conformity with investment objectives and risk guidelines.

Reporting

SFMI shall report to the Client, at the Client's request, as well as quarterly on its management as asset manager.

SFMI gives an account of its activities to its clients on the basis of the bank's records and along with its own statement of assets and performance. The accountability includes in particular a list of the assets under management and their valuation or market prices on the reporting date; the performance of the assets under management during the reporting period, and the total amount of the remuneration and compensation of the Asset Manager incurred during the reporting period.

At the end of each year, the Client receives a statement of his/her total assets under management. The performance of the total assets managed under is calculated in accordance with the guidelines of the Swiss Performance Presentation Standards. The Client is also entitled to request a copy of the documents relating to him/her at any time. The Client must object in writing within one month to the statements or records sent to him/her or handed over in person. If the deadline expires unused, they shall be deemed to have been approved. The express or tacit approval of the statement or records shall constitute acceptance of all items contained therein.

SFMI shall keep a copy of the documents served for one year.

Item 14: Client Referrals and Other Compensation

SFMI does not currently compensate any United States based third parties for client referrals.

Item 15: Custody

SFMI does not have actual custody of any Client assets under Rule 206(4)-2 of the Advisers Act and all Portfolio assets are held with an independent third party qualified custodian.

Each custodian bank is chosen and selected personally by the client.

SFMI is not authorized to obtain ownership or possession of funds or securities of the client.

The relationship between the Client and the custodian bank is governed by the general terms and conditions, the custody account regulations and the other documents issued by the custodian bank to the client.

Item 16: Investment Discretion

We generally have discretionary authority to determine, without obtaining specific consent, instruments to be bought or sold, the amount of instruments to be bought or sold, broker-dealer to be used and the commission rates paid. Any limitations on authority are included in each Client's Investment asset management, as applicable.

Item 17: Voting Client Securities

As the allocation to securities is done via Fund vehicles and not single stock allocation, it is the underlying fund manager's responsibility to cast any proxy votes and apply their regulatory approved proxy voting policies and procedures.

Item 18: Financial Information

Registered Investment Advisers are required in this item to provide you with certain financial information or disclosures about Firm's financial condition.

The Firm does not require or solicit pre-payment of any type of client fees in advance. The Firm has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Annex 1 – SFMI Privacy Policy

SFMI Investments SA (“SFMI”) may require that you provide current and accurate financial and personal information.

SFMI will protect the information you have provided in a manner that is safe, secure and professional. SFMI and its employees are committed to protecting your privacy and to safeguarding that information.

Safeguarding Customer Documents

SFMI may collect non-public customer data in checklists, forms, in written notations, and in documentation provided to us by our customers for evaluation, registration, licensing or related consulting services. We also may create internal lists of such data.

During regular business hours, access to customer records is monitored so that only those with approval may access the files. During hours in which the company is not in operation, the customer records will be locked.

No individual who is not so authorized shall obtain or seek to obtain personal and financial customer information. No individual with authorization to access personal and financial customer information shall share that information in any manner without the specific consent of a firm principal. Failure to observe SFMI’s procedures regarding customer and consumer privacy will result in discipline and may lead to termination.

Sharing Non-public Personal and Financial Information

SFMI is committed to the protection and privacy of its customers’ and consumers’ personal and financial information. SFMI will not share such information with any affiliated or non-affiliated third party except:

- When necessary to complete a transaction in a customer account, such as with the clearing firm or account custodians;
- When required to maintain or service a customer account;
- To resolve customer disputes or inquiries;
- With persons acting in a fiduciary or representative capacity on behalf of the customer;
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the firm;
- In connection with a sale or merger of SFMI’s business;
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims or other liability;

- To comply with federal, state or local laws, rules and other applicable legal requirements;
- In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement;
- In any circumstances with the customer's instruction or consent; or
- Pursuant to any other exceptions enumerated in the California Information Privacy Act.

Opt-Out Provisions

It is not a policy of SFMI to share non-public personal and financial information with affiliated or unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted above is necessary to service customer accounts or is mandated by law, there are no allowances made for clients to opt out.

Who to contact with questions.

If you have any questions about this Privacy Policy Notice, please contact us at directly.

Annex 2 – Form ADV Part 2B – SFMI Investment Advisory Personnel

These are available on request, please contact us at info@swissfim.com