

Data protection declaration for clients, business partners and website visitors of LLB Swiss Investment AG

Applicable to all persons in contact with LLB Swiss Investment AG, e.g. existing and future clients, business partners and website visitors of LLB Swiss Investment AG.

We process your data on the basis of the Federal Act on Data Protection (FADP) and the EU General Data Protection Regulation (GDPR). With this data protection declaration, we inform you about the most important aspects of the processing of your data.

As part of our business relationship, we are required to process personal data that is necessary for the establishment and implementation of the business relationship and the fulfilment of the associated legal or contractual obligations as well as for the provision of services or the execution of orders. Without this data, we will generally not be able to enter into or maintain a business relationship, process an order or offer services and products.

If you have any questions regarding individual data processing or wish to exercise your rights as described below, please contact our data protection officer:

LLB Swiss Investment AG, Claridenstrasse 20, 8002 Zurich. Phone: +41 58 523 96 70, email: investment@llbswiss.ch.

1) Which data is processed (data categories) and from which sources does it originate (origin)?

We collect and process personal data that we receive as part of our business relationship. Personal data may be processed at any stage of the business relationship and may differ depending on the group of persons involved.

In principle, we process personal data that you provide to us by means of submitted contracts, forms, your correspondence or other documents.

If necessary for the provision of the service, we also process personal data that is generated or transmitted as a result of the use of products or services or that we have legitimately received from third parties (e.g. with "World-Check" from Refinitiv), from public databases (e.g. sanctions lists) or from other companies within the LLB Group. Finally, personal data may also be processed from publicly accessible sources (e.g. commercial register, press, internet).

We may also process the personal data of other third parties involved in the business relationship, such as authorised representatives or agents. We kindly ask you to inform any third parties about this data protection declaration.

We understand or process the following data categories in particular as personal data:

Basic data

- ♦ Personal details (e.g. name, date of birth, nationality);
- ♦ Address and contact details (e.g. physical address, telephone and fax number, e-mail address);
- ♦ Identification data (e.g. passport or ID card)*;
- ♦ Authentication data (e.g. specimen signature)*;
- ♦ Data from publicly accessible sources (e.g. UN, EU and Swiss sanctions lists)*.

Additional basic data

- ♦ Information about the professional background (e.g. professional activity, trainings, etc.)*;
- ♦ Technical data and information on electronic communication with LLB Swiss Investment AG (e.g. IP address, records of access or changes).

**We collect this type of data from certain natural persons in relevant functions at our customers and business partners - our customers and business partners are generally (financial) institutions.*

2) For what purposes and on what legal basis will your data be processed?

We process personal data in accordance with the provisions of the FADP and the GDPR for the following purposes or on the basis of the following legal bases:

- ♦ **To fulfil a contract or to carry out pre-contractual measures** in the context of the provision and brokerage of financial services and to process orders. The purposes of data processing are primarily based on the specific service or product.
- ♦ **To fulfil legal obligations or measures in the public interest**, in particular compliance with legal and regulatory requirements (e.g. compliance with the FADP, the GDPR, money laundering regulations, market abuse provisions, control and reporting obligations, risk management).
- ♦ **To safeguard our legitimate interests or those of third parties** for specifically defined purposes, in particular for product development, business review and risk management, reporting, statistics and planning, video surveillance to safeguard domiciliary rights and to avert dangers.
- ♦ **On the basis of your consent**, which you have given us for the provision and placement of financial services or on the basis of orders, such as the transfer of data to service providers or contractual partners outside the EU or the EEA. You have the right to withdraw your consent at any time.

We reserve the right to continue processing personal data collected for one of the above purposes for other purposes if this is compatible with the original purpose or is authorised or required by law.

3) Who has access to the personal data and how long it is stored?

Access to your data may be granted both to units within and outside LLB Swiss Investment AG. **Within LLB Swiss Investment AG**, only departments or employees may process your data if they need it to fulfil our contractual, legal and supervisory obligations and to protect legitimate interests.

In compliance with data protection regulations, **other LLB Group companies or external service providers** may also receive personal data for these purposes. Such service providers may be active in the areas of finance, IT, logistics, printing & design, advisory and consulting as well as sales and marketing. If there is a legal or regulatory obligation, public bodies and institutions (e.g. supervisory authorities) may also receive your personal data.

Your personal data is primarily processed in **Switzerland and Liechtenstein** (location of our servers). Depending on the use of products or services, it may also be necessary to process your personal data in other countries, which currently include the following:

- ♦ **Germany** (e.g. for the creation and dispatch of certain fund reports);
- ♦ **Austria** (e.g. for the preparation and dispatch of certain investor reports);
- ♦ **Luxembourg** (e.g. for access to our investment risk management platform);
- ♦ **USA** (e.g. for sending our newsletter and accessing our proxy voting platform).

Data is only **transferred** to countries **outside the EU or the EEA** if

- ♦ this is necessary for the implementation of pre-contractual measures or for the fulfilment of a contract, the provision of services or the processing of orders,
- ♦ you have given us your consent,
- ♦ this is necessary for important reasons of public interest or
- ♦ this is required by law.

We process and store the personal data for the entire duration of the business relationship, unless there are shorter mandatory deletion obligations for certain data. It should be noted that our business relationships can last for years.

If the data is no longer required for the fulfilment of contractual or legal obligations or to safeguard our legitimate interests (achievement of purpose) or if consent has been revoked, it will be deleted on a regular basis. Unless further processing is necessary due to contractual or legal **retention periods** and documentation obligations or for reasons of preserving evidence for the duration of the applicable statute of limitations (**usually 10 years**).

4) Is there automated decision-making, including profiling?

Automated processing of personal data may take place in some cases. This is done with the aim of evaluating certain personal aspects where we are required to do so by law and regulations (e.g. sanctions lists) or as part of risk management (e.g. money laundering regulations).

Our decisions are not based solely on automated processing of personal data.

5) How is personal data processed when using our website or our app?

We process the personal data necessary for the use of our **website** and **app**, e.g. the information you provide and the data we collect directly.

When you use our website or app, we do not collect any metadata for analytical or other purposes. We only collect so-called log data when you log in to the website or app, which includes the date and time of the login.

We only collect further personal data in the following cases:

- ♦ You place an **electronic enquiry** on our website.
(As part of the process of sending an electronic enquiry, your consent is obtained for the processing of the data and reference is made to this privacy policy. Your personal data will be deleted after 10 years.)
- ♦ You subscribe to our **newsletter**.
(To ensure the security of your data, we use the so-called double opt-in procedure. This means that we will send you a confirmation link to your e-mail address after you have entered your e-mail address. Only when you click on or confirm this link will you receive our newsletter in future. Your consent is required to subscribe to the newsletter. You give us thisRight to object: You have the right

to object informally to data processing in individual cases for reasons arising from your particular situation, provided that the processing is in the public interest or is carried out to safeguard the legitimate interests of LLB Swiss Investment AG or a third party. In addition, you have the right to object informally to the use of personal data for advertising purposes consent by subscribing to the newsletter, with which you also acknowledge our data protection information. Your personal data will be deleted 10 years after cancellation of the subscription.)

- ♦ We set up login data for our **website or app** on your behalf.
(When you register on our website, your consent is obtained for the processing of the data and reference is made to this privacy policy. Your personal data will be deleted 10 years after cancellation of the login data.)

In these aforementioned cases, we only process the following additional personal data: surname, first name, home address, e-mail address, postal address, country and telephone and fax number, browser language and the date and time of sending of the person making the enquiry/subscribing/dialing in.

Your personal data is passed on to several **processors** as part of an order processing contract (e.g. our website is hosted by Nine Internet Solutions AG in Zurich, email traffic is handled by the server and IT infrastructure of Liechtensteinische Landesbank AG in Vaduz and Frankfurter Bankgesellschaft (Schweiz) AG in Zurich, the newsletter is sent via MailChimp in Atlanta/USA). Your personal data is neither sold to third parties nor commercialised in any other form.

Only **session cookies** are used on our website and app for efficient, user-friendly navigation. These cookies simplify and speed up the interaction between you and the website. However, we **do not use cookies for behavioural analyses**, targeted **advertising and marketing** messages or **other purposes**. No personal data is therefore processed with the cookies we use. Nevertheless, you can generally block cookies, which you can find more information about under "Help" in your browser. Please note that by blocking, deactivating or managing one or all cookies, you may not have access to certain functions or offers on our website or in our app. Session cookies are deleted as soon as the internet browser is closed.

Our website may contain **links to websites of other providers** that are not covered by this data protection declaration.

6) What data protection rights are you entitled to?

You have the following data protection rights with regard to your personal data:

- ♦ **Right to information:** You can request information from LLB Swiss Investment AG as to whether and to what extent personal data relating to you is being processed (e.g. categories of personal data processed, purpose of processing, etc.).
- ♦ **Right to rectification, deletion and restriction of processing:** You have the right to request the rectification of inaccurate or incomplete personal data concerning you. In addition, your personal data must be deleted if this data is no longer necessary for the purposes for which it was collected or processed, if you have withdrawn your consent or if this data is being processed unlawfully. You also have the right to request the restriction of processing.
- ♦ **Right to withdraw consent:** You have the right to withdraw your consent to the processing of personal data concerning you for one or more specific purposes at any time if the processing is based on your express consent. Please note that the cancellation is only effective for the future. Processing that took place before the revocation is not affected. The revocation also has no influence on data processing on another legal basis.

- ♦ **Right to data portability:** You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format or to have this data transmitted to a third party.
- ♦ **Right to object:** You have the right to object informally to data processing in individual cases for reasons arising from your particular situation, provided that the processing is in the public interest or is carried out to safeguard the legitimate interests of LLB Swiss Investment AG or a third party. In addition, you have the right to object informally to the use of personal data for advertising purposes.
- ♦ **Right of complaint:** You have the right to complain with the competent Swiss supervisory authority.

The **contact details of the data protection authority** responsible in Switzerland are as follows:

Federal Data Protection and Information Commissioner (FDPIC), Feldeggweg 1, 3003 Bern. Telephone no. +41 58 462 43 95, electronically via the website of the FDPIC.

Requests for information or objections should preferably be submitted in writing to the office responsible for data protection at LLB Swiss Investment AG. This office is also available to you as a contact partner for all other data protection matters.

Status: September 2023