

## How Rahn+Bodmer Co. processes data

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### General information about data processing

Rahn+Bodmer Co. collects and processes personal data in order to comply with national and international laws and regulatory rules. This is always done in compliance with data protection legislation. Personal data is only processed insofar as this is necessary to enable us to provide you with the services we offer and insofar as this is admissible by law.

What products and services are actually used determines which specific details of data are processed and in what form they are used.

### Business relationship

Where accessing services, clients of Rahn+Bodmer Co. must disclose all personal data necessary to establish and conduct a business relationship and fulfil the associated contractual obligations as well as any data that we are required to collect by law. If the personal data of clients change, these changes must be reported to Rahn+Bodmer Co. via typical means of communication.

### Data source

The personal data processed by Rahn+Bodmer Co. originate from the following sources:

- Data which we receive during and within the scope of our business relationship with our clients or data which has been shared or communicated with us by the concerned person beforehand.
- Data which has been shared with us by third parties for the execution of orders, fulfilment of contracts or with the consent of the client (e.g. from pension funds, powers of attorney, inheritance moderators, card issuers, employee benefits schemes, insurance companies, third-party banks, land registries, etc.).
- Data from Swiss and foreign public offices, authorities and courts within the scope of their operations.
- Data that we receive from publicly accessible sources (e.g. the Internet, the media, commercial register, land register, etc.) or reliably via specialised service providers and partners (e.g. external asset managers).
- Data that is transmitted to the Bank via the technical infrastructure (e.g. via access to websites, cookies, e-Banking, apps, etc. or via collaborative processes such as in payment systems or trade of securities).

### Purpose of data processing

Rahn+Bodmer Co. processes your personal data in order to fulfil its (pre-)contractual obligations, perform its services and for business and legally required purposes. This includes but is not limited to:

- The services of a private bank, i.e. pre-contractual or contractual services performed at the request of a data subject (e.g. account management, payments, asset man-

agement, consultancy, financing, financial planning, cards, investments, stock exchange transactions, succession planning, etc.).

- Monitoring and managing risks, transaction evaluation, initiation of transactions, execution of transactions (e.g. investment profiles, limits, and market, credit or operational risks).
- Marketing, consultancy and information about the services on offer, preparation and provision of tailored services (e.g. direct marketing, events for clients and potential clients, advertising, etc.).
- Assessment of client, market or product potential, planning, product development, analyses (e.g. for the improvement of products, services, processes or systems, transaction and usage analyses, etc.).
- Statutory or regulatory information duties and reporting duties to courts and authorities, compliance with statutory or regulatory obligations or orders (e.g. exchange of information with foreign tax authorities and obligations connected with the collection of personal data for the purposes of preventing money laundering and terrorist financing, etc.).

### Categories of personal data

Depending upon which products and services are actually used, the following categories of personal data are processed:

- Identification and contact data (e.g. name, nationality, date of birth, address, telephone number, etc.).
- Data about family and economic conditions.
- Information about occupation and education.
- Health data, to the extent necessary (e.g. information about legal capacity, need for protection, etc.).
- Transaction data (e.g. beneficiaries, bank of beneficiaries, etc.).
- Order and risk management data (e.g. details about the asset situation, risk and investment profile data, investment products, etc.).
- Data about the usage of services (e.g. logins, etc.).
- Marketing data (e.g. preferences, needs, etc.).
- Data for the administration of products and services actually used (e.g. card limits, card usage, dispatch of information, etc.).
- Technical data (e.g. internal/external IDs, cookies, IP addresses, etc.).

### Automated decisions and profiling

Profiling describes a fully automated data processing system which has the goal of evaluating a person and analysing or predicting their behaviour (e.g. with regard to their personal preferences). Rahn+Bodmer Co. does not use any procedures or methods that

have the goal of an entire automated (referred to as “real-time”) profiling or automated decision-making. Rahn+Bodmer Co. does, however, use methods which can analyse personal data in the sense of soft profiling (e.g. the fulfilment of legal duties such as transaction analyses with regard to money laundering, risk classification, client segmentation, etc.) or for the improvement of the client experience.

#### **Recipients or categories of recipients to whom data may be transmitted**

As a matter of principle, Rahn+Bodmer Co. only discloses data insofar as this is necessary. In the case of public authorities, it does so where required by overriding legal provisions, and in the case of third parties, where acting on client instructions or in order to accomplish/fulfil the above purposes, for example:

- For executing orders, i.e. where the client utilises its products or services (e.g. to payment recipients, intermediaries, correspondent banks, custodian banks, brokers, other stock exchanges and marketplaces, reports to international transaction registers, for the execution of orders to engaged external service providers, land registries and debt enforcement offices, etc.).
- For the purposes of fulfilling statutory obligations, obtaining legal justification or complying with regulatory orders, it may disclose data to courts or supervisory authorities responsible for overseeing financial markets and enforcing tax law (e.g. Swiss Financial Market Supervisory Authority (FINMA), money laundering reporting office, public prosecutor’s office, child and adult protection authority (CAPA), etc.), or Rahn+Bodmer Co. may also disclose data if this is necessary to protect its legitimate interests against the client or in order to re-establish client relations with the competent Swiss authorities after these have broken off.
- Data is only transmitted abroad where this is necessary for the execution of client orders (e.g. payment and securities orders), where prescribed by law (e.g. fiscal reporting duties), or where the client has consented to it.

#### **Data security**

Rahn+Bodmer Co. implements technical and organisational security measures to protect data against accidental or intentional manipulation, loss, destruction or access by unauthorised persons. Our security measures (e.g. firewalls, encryption technology, physical and technical access restrictions, periodic backups, etc.) are continuously being optimised according to technological development.

#### **Length of time personal data is retained**

If the data for the purposes of data processing or for fulfilment of contractual or legal obligations is no longer required (e.g. for the fulfilment of commercial and fiscal retention obligations or retention of business records of dormant assets), this data is regularly deleted. The legal retention periods amount to generally ten years after the conclusion of the business relationship or after conclusion of the business transaction.

#### **Rights**

Persons affected are entitled to request information from Rahn+Bodmer Co. on whether any of their personal data is being processed.

Moreover, where such rights are compatible with legal and regulatory provisions and compatible with an existing or a potential future contractual relationship and technically possible, they have the right to have data rectified or erased, the right to restrict the processing of the data, the right to data portability and the right to withdraw their consent to the processing of the data.

Any matter relating to data protection can be reported to the responsible data protection supervisory authority.

Please submit your request for information to the Bank in writing, together with a copy of a valid official identity document (e.g. passport, identity card or driving licence).

The right to refuse the data processing for marketing purposes can be exercised by sending a respective notification.

#### **Data protection concerns**

Rahn+Bodmer Co. can be contacted as the responsible body for the processing of data on all issues relating to processing of personal data:

Rahn+Bodmer Co.  
Legal & Compliance  
8021 Zürich  
datenschutz@rahnbodmer.ch