

## 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 statutory and supervisory regulations and in accordance with data protection legislation. Personal data means any information relating to an identified or identifiable natural person. Processing means any handling of personal data, irrespective of the means and procedures used, in particular the collection, storage, keeping, use, modification, disclosure, archiving, deletion or destruction of data.

Personal data is only processed to the extent that this is done with the consent of the data subject or is necessary and permissible for the performance of the services offered, for the protection of legitimate interests or for the fulfilment of statutory or regulatory obligations.

Which data is processed in detail and how it is used depends on the products and services used.

### Business relationship

Within the scope of a business relationship, clients of Rahn+Bodmer Co. must disclose the personal data that is required to establish and maintain a business relationship and to fulfil the associated contractual obligations as well as any data that we are required to collect by law. Should such personal data change, these changes must be reported to Rahn+Bodmer Co. by the usual means of communication.

### Data origin

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

- Data which we receive from our clients within the scope of a business relationship or data which has been shared or communicated to us by the data subjects themselves in advance (e.g. a contact request via the website).
- Data provided to us by third parties for the execution of orders, for the fulfilment of contracts or with the consent of the client (e.g. within the scope of powers of attorney, from pension funds, representatives of heirs, card issuers, employee benefits schemes, insurance companies, third-party banks, land registry offices).
- Data from domestic and foreign public offices, authorities and courts within the scope of their activities.
- Data that we obtain from publicly accessible sources (e.g. internet, media, commercial register, land register) or permissibly via specialised service providers and cooperation partners (e.g. external asset managers).
- Data transmitted to the Bank via the technical infrastructure (e.g. when accessing the website, cookies, e-Banking, apps) or via collaborative processes, such as payment transactions or securities trading.

### Purpose of data processing

Rahn+Bodmer Co. processes personal data for the fulfilment of (pre-)contractual obligations, for the processing of services and for business and legally required purposes. This includes but is not limited to:

- The services of a private bank within the framework of contractual or pre-contractual measures taken at the request of a data subject (e.g. client registration procedures, account management, asset management, investment advice, financial planning, succession planning, cards, investments, stock exchange transactions, payments).
- Monitoring and management of risks, business reviews, initiation of transactions, settlement of transactions (e.g. investment profiles, limits, market, credit or operational risks).
- Marketing, advice and information about the services on offer, preparation and provision of tailored services (e.g. direct marketing, events for clients and potential clients, advertising).
- Assessment of client, market or product potential, planning, product development, analyses (e.g. to improve products, services, processes or systems, transaction and usage analyses).
- Statutory or regulatory disclosure, information or reporting obligations to courts and authorities, compliance with legal or regulatory obligations or orders (e.g. exchange of information with foreign tax authorities, obligation to collect personal data for the purpose of preventing money laundering and terrorist financing, recording and monitoring of communications).

### Categories of personal data

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

- Identification and contact data (e.g. name, nationality, date of birth, address, telephone number, e-mail).
- Data on family relations and economic situation, including data on third parties (e.g. family members, authorised representatives, advisors).
- Information on professional activities and education.
- Information on tax residence and, if necessary, other tax-relevant data.
- Health data, if necessary (e.g. information on capacity to act, need for protection).
- Transaction data (e.g. beneficiaries, beneficiary bank).
- Order and risk management data (e.g. information on the wealth situation, information for the risk and investment profile, knowledge and experience with investment products, sustainability preferences).

- If applicable, recordings of telephone conversations between you and Rahn+Bodmer Co.
- Marketing data (e.g. interests, needs, wishes).
- Data for the administration of products and services used (e.g. card limits, card use, dispatch of information).
- Technical data (e.g. internal/external identifiers, cookies, IP address, logins).

#### **Automated individual decisions and profiling**

Profiling means any form of automated processing of personal data intended to evaluate certain personal aspects relating to a natural person (e.g. personal preferences, economic situation, health and behaviour). Rahn+Bodmer Co. does not use any procedures or methods that are aimed at fully automated profiling or automated individual decisions. However, Rahn+Bodmer Co. does use methods that may analyse personal data (e.g. to comply with statutory obligations, such as transaction analyses within the meaning of the Anti-Money Laundering Act, risk classification, client segmentation) or to improve the client experience.

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

As a matter of principle, Rahn+Bodmer Co. only discloses personal data to the extent necessary. In the case of public authorities, it does so where required by overriding statutory provisions, and in the case of third parties, where acting on client instructions or for the processing/fulfilment of the above-mentioned purposes, e.g.:

- For the execution of orders, i.e. the use of products or services (e.g. to payment recipients, intermediaries, correspondent banks, custodians, brokers, trading venues, reports to trade repositories, for the execution of orders to external service providers, land registries and debt enforcement offices).
- On the basis of statutory obligations, legal justifications or official orders (e.g. to courts, law enforcement agencies, the Swiss Financial Market Supervisory Authority FINMA, the Money Laundering Reporting Office, the Child and Adult Protection Authority, the Swiss Federal Tax Administration) or to the extent necessary to protect the legitimate interests of Rahn+Bodmer Co. The latter applies in particular in the event of legal action threatened or initiated by the client against the Bank or public statements, to secure the Bank's claims against the client or third parties, to collect claims of the Bank against the client and to restore contact with the client after contact has been broken off with the competent Swiss authorities.
- Data will only be disclosed abroad if it is necessary for the execution of client orders (e.g. payment and securities orders), if it is required by law (e.g. tax reporting obligations), or if the client has consented to it.

#### **Data security**

Rahn+Bodmer Co. takes numerous technical and organisational measures to prevent the accidental or unlawful loss, deletion, destruction or modification of personal data or its disclosure or access to unauthorised persons. The security measures are continuously optimised in line with technological developments.

#### **Retention period**

If the data is no longer required for the purposes of data processing or the fulfilment of contractual or legal obligations (e.g. for the fulfilment of commercial and tax law retention obligations or retention of business records of dormant assets), it is regularly deleted. The statutory retention periods are generally ten years after termination of the business relationship or after conclusion of the business transaction. In the case of ongoing or anticipated legal or supervisory authority proceedings, longer retention periods may apply.

#### **Rights**

Data subjects may request information from Rahn+Bodmer Co. on whether personal data relating to them is being processed. Furthermore, they have the right to rectification, deletion, restriction of data processing, data portability, revocation and objection to the processing of data. These rights may be restricted due to statutory and regulatory provisions and overriding interests, as well as if this is not compatible with an existing or pending contractual relationship or is not technically possible.

Data protection concerns or complaints can be reported to the competent data supervisory authority.

The Bank accepts requests for information in writing and together with a copy of a valid official form of identification (e.g. passport, identity card or driving licence).

The right to waive data processing for marketing purposes may be exercised by sending a respective notification.

#### **Data protection concerns**

For requests for information and questions regarding data protection, Rahn+Bodmer Co. can be contacted as follows:

Rahn+Bodmer Co.  
Data Protection  
8021 Zürich  
datenschutz@rahnbodmer.ch

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Rahn+Bodmer Co. reserves the right to amend this privacy policy from time to time. In the event of a material adjustment, we will inform data subjects in an appropriate manner.