

# **Privacy Statement**

## **Customer Information on Data Protection**

CREDIT EUROPE BANK (Suisse) SA cares about the protection of your personal data very seriously and strictly observes protection rules.

1. Data processing general purpose We process personal data that we obtain from our clients in the context of our business relationship for providing banking and financial services in connection with the performance of our agreements with our clients. We also process – insofar as necessary to provide our service – personal data that we obtain from publicly accessible sources (such as debt registers, commercial and association registers, press or internet). or that is legitimately transferred to us by other companies (e.g. a credit agency).

### 2. Personal Data

"Personal Data" is any personal information relating to you or that we can otherwise link to you. Personal data includes name, address, other contact details, date and place of birth, nationality, family details (e.g. name of spouse, partner, or children), identification data (e.g. ID Cards), authentication data (e.g. sample signature), order data (e.g. payment order), data from the fulfillment of our contractual obligations, or information about your financial situation (e.g. creditworthiness data, scoring, rating data, origin of assets).

### 3. Your consent

To the extent you have consented to the processing of your Personal Data by us for certain specific purposes other than for the fulfillment of contractual obligations or absent of any legitimate interests from our side, such processing is legitimate on the sole basis of your consent. Such Consent once given may be revoked at any time. Such revocation of consent has an effect only for the future and does not affect the legitimacy of the data processed until revocation. If you submit an objection, we will no longer process your Personal Data unless we can give evidence of a legal or contractual obligation, mandatory, legitimate reasons for processing which take precedence over your interests or rights or if processing serves to assert, exercise or defend legal claims.

### 4. Third parties

As a general rule, we will not pass the data collected on to third parties without your consent or unless required by law or regulations, including under a code of practice or conduct, or when public or governmental authorities (such as tax authorities), or regulators (such as FINMA), require us to disclose data. In addition, we may have to disclose your data to third parties when providing products and services to you, where persons are acting on your behalf or are otherwise involved in the transaction depending on the type of product or service you receive from us. In particular, we may have to

disclose data, including Personal Data, to trade repositories, stock exchanges, and other financial institutions, such as credit reference agencies or similar institute for assessing your creditworthiness, when the bank is acting on your behalf as nominee or to service providers, in particular in case of outsourcing. If the third party or the service provider is located in a jurisdiction which does not provide an adequate level of protection, such third party will have to comply with appropriate measures designed to protect your Personal Data.

#### 5. Obligation to provide data and statutory or legal obligations

In the context of our business relationship, you are obliged to provide those Personal Data that are required for accepting, commencing, executing and terminating a business relationship. Without these data we are in principle not able to enter into an agreement with you, to perform such agreement or to terminate it.

Under the statutory regulations, in particular anti-money laundering regulations, we are under the obligation to identify you by an ID document and especially to ask for and record your name, place of birth, date of birth, nationality, address and identity card details before establishing a business relationship. So as to enable us to comply with these statutory obligations, you are obliged to provide the necessary information and documents in connection with the anti-money laundering regulations and any related regulations, such as embargo or sanction regulations and to report any changes that may occur over the course of the business relationship. If you do not provide us with the necessary information and documents, we cannot enter into or continue the desired business relationship. Other statutory or legal regulations may be applicable and require the provision of other type of Personal Data, such as tax domicile and other tax-related documents and information, knowledge of and experience in investment matters, professional information about you, such as your job title and work experience.

#### 6. Use of profiling

We generally do not process your personal data through automated decision-making process. Where this takes place, you will be informed of such use, be given information on the reason, and be informed of the possible consequences of such processing. In certain circumstances, you can request not to be subject to automated decision-making. Due to legal and regulatory requirement, we are obliged to process your Personal Data in order to ensure compliance with certain regulations, in particular anti-money laundering and related regulations. For this purpose, we may use automatic assessment tools, in particular regarding payment transactions. For assessment of your creditworthiness, we may use tools based on a mathematical/statistical automatic process. This allows us to calculate the likelihood of clients being able to fulfill their payment obligations. This calculation may be influenced by the client's income ratios and expenditure, pending liabilities, occupation, employer, duration of employment, experience from previous business relationships, contractual repayment of previous loans and information from credit information offices.

#### 7. Cookies, Analytical tools and social plug-ins

Cookies are text files placed on your device to help analyze how users use a website. After the browser session, most of the cookies we use are deleted from your hard disk ("session cookies"). Other cookies remain on your computer ("permanent cookies") and permit its recognition on your next visit to our website. This allows us to improve your access to our website. You can prevent the storage of permanent cookies by choosing a "disable cookies" option in your browser settings. Our website does not contain any analytical tool, such as Goggle Analytics nor social plugs-in.

### 8. Storage

CREDIT EUROPE BANK (Suisse) SA will store the data as long as required for the provision of its services and subject to the legal or regulatory limitation period. In addition, we might process your Personal Data after the termination of our business relationships for operational purposes in accordance with the applicable laws as well as pursuant to various retention and documentation obligations.

### 9. Your rights

Subject to some restrictions, in particular when we are obliged by statutory provisions to retain your personal data, you have the right to request access to the data we hold about you, including the right to request correction of incorrect Personal Data, their restriction and deletion. You may exercise these rights by submitting a request to the following address: [DataProtection@crediteurope.ch](mailto:DataProtection@crediteurope.ch). In addition, you have the right to be informed about the Personal Data stored and the purpose of the processing at any time. You may also lodge a complaint with the competent data protection supervisory authority if you believe that our processing of your personal data infringes applicable data protection laws. .

10. Policy status and update. This Privacy Statement was updated in May 2018. This Privacy Statement is not a contractual binding document. We reserve the right to amend it from time to time. If the notice has been updated, we will take steps to inform you of the update by appropriate means.

If you have any question on your Personal Data, or any questions this Privacy Statement, please contact us at [DataProtection@crediteurope.ch](mailto:DataProtection@crediteurope.ch) or write us to CREDIT EUROPE BANK (Suisse) SA, 12, Rue du Mont-Blanc, 1201 Geneva, Switzerland.

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