

Privacy Policy of the Vested Benefits Foundation of Bank CIC (Switzerland) Ltd.

This **Privacy Policy** provides information on the personal data we process in connection with our **activities and operations** including our websites cic.ch and cic-on.ch (plus their various sub-domains). In particular, we provide information on what personal data we process, as well as why, how and where we process them. We also provide information on the rights of people whose data we process.

Further privacy policies and miscellaneous other legal documents such as the Vested Benefits Institution Rules, Conditions of Use or Terms of Entry may apply for specific or additional activities and operations.

1. Contact addresses

Controller for processing personal data:

Vested Benefits Foundation of Bank CIC (Switzerland) Ltd.
c/o Bank CIC (Switzerland) Ltd.
Marktplatz 13
4001 Basel

vorsorge@cic.ch

Please note that other controllers may be responsible for processing personal data in individual cases. The foundations may provide these data to third parties (i.e. Bank CIC (Switzerland) Ltd.) they have appointed, provided the disclosure is in connection with opening and/or maintaining a business relationship.

Data protection advisor

Bank CIC (Switzerland) Ltd.
IT Security + Datenschutz
Marktplatz 13
4001 Basel

datenschutz@cic.ch

Data protection representative in the European Economic Area (EEA):

The contact details of our data protection representative pursuant to Article 27 GDPR are shown below. The data protection representative acts as an *additional* point of contact for supervisory bodies and data subjects in the European Union (EU) and the rest of the European Economic Area (EEA) for queries relating to the General Data Protection Regulation (GDPR):

Groupe Crédit Mutuel Alliance Fédérale

THE DATA PROTECTION OFFICER

63 chemin Antoine Pardon

69814 TASSIN CEDEX

2. Definitions and basis in law

2.1. Definitions

Personal data means *any* information relating to an identified or identifiable natural person. A **data subject** is a person about whom personal data are processed.

Processing means *any* operation which is performed on personal data, *regardless* of the means and procedures used, in particular storing, disclosing, obtaining, collecting, deleting, saving, altering, deleting and using personal data.

2.2. Basis in law

We process personal data in compliance with Swiss data protection legislation, specifically the [Data Protection Act](#) (DPA) and the [Data Protection Ordinance](#) (DPO).

3. Nature, scope and purpose

We process personal data which are *necessary* to allow us to carry out our activities and operations securely and reliably in a user-friendly manner on a permanent basis. This may in particular include data falling into the following categories: inventory data, contact data, browser and device data, content data, meta and usage data, location data, sales data and contract, payment, financial and asset data.

We process personal data for the *period* needed for the purpose(s) necessary or legally required. Personal data that no longer need to be processed are anonymised or erased.

We may arrange for personal data to be processed *by third parties*. We may process personal data jointly with third parties or transmit them to third parties. These third parties include in particular specialised providers whose services we use. We ensure these third parties also protect data.

We only process personal data with the consent of the data subject, unless this is permitted on other legal grounds. Processing without consent may for example be permissible to fulfil a contract with the data subject and for associated pre-contractual activities in order to protect our overriding legitimate interests, because processing is obvious in the circumstances or after giving notice.

Within this framework, we process in particular data that a data subject provides us with *voluntarily or as required under banking regulations* when making contact (e.g. by post, email, instant messaging, contact form, social media or telephone) or to open and maintain an account. We may for instance save this information in an address book, customer relationship management (CRM) system or similar tool. When data about other people are transmitted to us, those transmitting them are obliged to ensure data protection in respect of those persons and that the personal data are accurate.

We also process personal data we receive from third parties, obtain from publicly available sources or gather in the course of carrying out our activities and operations, provided and to the extent that such processing is lawful.

We process your data solely for the purposes of establishing, managing and processing contractual relationships, including processing transactions within the relationship and maintaining master data, for marketing and communications purposes, to maintain relationships, improve our services and firm, and for product development.

3.1. Other purposes of processing

We process data for security purposes and access control, e.g. to monitor, control, analyse and test our networks and IT infrastructure, for system and error checks, for documentation purposes and for backing up. Access controls include both access to electronic systems (e.g. logging in to user accounts) and physical access control (e.g. building access with entry records). We use monitoring systems (e.g. security cameras) for security purposes (both for preventive purposes and to investigate incidents).

4. Personal data abroad

In principle, we process personal data in Switzerland. However, we may also export/transmit personal data to other countries, especially to process them or have them processed there, where this is not subject to restrictions in other legislation such as the Banking Act.

We may disclose personal data in all [countries and territories](#), provided the law in such places ensures appropriate protection of data in the [opinion of the Federal Data Protection and Information Commissioner](#) (FDPIC) or according to the [ruling of the Swiss Federal Council](#).

We may disclose personal data in countries where the law does not ensure appropriate data protection, provided suitable data protection is ensured on other grounds, e.g. by contractual agreements to this effect, under standard data protection clauses or by other appropriate guarantees. In exceptional cases, we may export personal data to countries without appropriate or suitable data protection if the special conditions under data protection legislation are satisfied, e.g. the express consent of the data subject or a direct connection with entering into or processing a contract.

5. Rights of data subjects

5.1. Entitlements under data protection legislation

We grant data subjects all entitlements under applicable data protection legislation. Specifically, data subjects have the following rights:

- **Information:** Data subjects may request information as to whether we process personal data about them and, if so, what they are. Data subjects also receive the information necessary to assert their data protection rights under data protection legislation and to ensure transparency. This includes the processed personal data *per se*, and also amongst other things information on the purpose of processing, the retention period, any disclosure/export of data to other countries and the origin of the personal data.
- **Rectification and restriction:** Data subjects can insist inaccurate personal data be rectified and processing of their personal data restricted.
- **Deletion and objection:** Data subjects can insist personal data be deleted ("right to be forgotten") and object to their personal data being processed.
- **Release and transfer of data:** Data subjects can insist their personal data be released or transferred to another controller.

We may delay, restrict or refuse the exercise of rights by data subjects to the extent permitted in law. We may also refer data subjects to any conditions that must be

satisfied to exercise their rights under data protection legislation. For example, we may refuse to provide information in whole or in part with reference to commercial secrecy or to protect other people. We may also, for example, refuse to delete personal data in whole or in part with reference to statutory retention periods.

In exceptional cases, we may impose costs to exercise rights. Data subjects will be notified in advance if any costs are due.

We are obliged to take appropriate action to identify data subjects who request information or seek to enforce other rights. Data subjects have a duty to cooperate.

5.2. Right to lodge a complaint

Data subjects have the right to take legal action to enforce their entitlements under data protection legislation or lodge a complaint with a competent data protection supervisory authority.

The data protection supervisory authority for private-sector controllers and Federal bodies in Switzerland is the [Federal Data Protection and Information Commissioner](#) (FDPIC).

6. Data security

We take suitable technical and organisational measures to ensure data security appropriate to the level of risk. We are constantly reviewing and improving the appropriate security of our IT and other infrastructure; however, we are unable to offer any warranty of absolute data security.

Access to our website is by encrypted transmission (SSL/TLS, primarily using hypertext transfer protocol secure, or HTTPS for short).

Like all digital communication *in principle*, ours is subject to mass monitoring without cause or suspicion, as well as other monitoring by security agencies in Switzerland, the rest of Europe, the United States of America (USA) and other countries. We have no direct influence on the corresponding processing of personal data by secret services, police bodies or other security agencies.

7. Use of the website

Bank CIC's [privacy policy](#) applies to the use of the websites (cic.ch and cic-on.ch).

8. Messages and communications

We send messages and communications by email and via other communications channels such as SMS.

8.1. Measuring success and reach

Messages and communications may contain web links or tracking pixels that record whether an individual message has been opened and which web links were clicked. These web links and tracking pixels may record use of messages and communications by an individual person. We have to statistically record use to measure success and reach in order to make messages and communications effective and user-friendly and

reflect addressees' needs and reading habits, and to be able to send them in a way that is secure and reliable on an ongoing basis.

8.2. Consent and objection

You must *in principle* give express consent to your email address being used, unless use is permitted on other legal grounds. When you subscribe to our Newsletter, we use the double opt-in procedure; in other words, you receive an email with a web link you have to click to confirm. This is to prevent misuse by unauthorised third parties. We may keep a log of these consents, including the internet protocol (IP) address and date and time, for purposes of proof and security.

You have the right *in principle* to object to receiving messages and communications such as newsletters at any time. When objecting, you may simultaneously object to the statistical recording of use to measure success and reach in the future. Messages and communications that are necessary in connection with our activities and operations remain reserved.

8.3. Service providers for messages and communications

We use specialist service providers to help us send the email Newsletter. Specifically, we use:

- [mailXpert](#): newsletter distribution; provider: mailXpert GmbH (Schweiz); data protection details: [Privacy Policy](#), "[Switzerland as a data location](#)"

9. Third-party services

We use services from specialist third parties to allow us to carry out our activities and operations securely and reliably in a user-friendly manner on a permanent basis.

Specifically, we use:

- Services of Bank CIC (Switzerland) Ltd, in particular for the management of accounts, transaction processing and maintenance of master data. For further information, please refer to the [privacy policy](#) of Bank CIC (Switzerland) Ltd.

10. Final provisions

We drew up this Privacy Policy using the [Data Protection Generator](#) from [Datenschutzpartner](#), amending and expanding it as necessary.

We may amend and expand this Privacy Policy at any time. We will provide information on any such amendments and additions in a suitable manner, in particular by publishing the latest Privacy Policy on our website.