



Data protection information under the Swiss Federal Act on Data Protection and EU General Data Protection Regulation for prospective clients

The following information provides an overview of how we process your personal data and your rights under data protection law.

1. Who is responsible for the data processing and who can you contact in this regard?

Controller:	Our internal data protection officer may be contacted at:
Deutsche Bank (Switzerland) Ltd	Deutsche Bank (Switzerland) Ltd
Place des Bergues 3	Data protection officer
Case Postale	Hardstrasse 201, Prime Tower
1211 Genève 1	8005 Zürich
Tel: +41 22 739 0111	Tel: +41 58 111 0111
Fax: +41 22 739 0700	E-mail: dbs.dpo@db.com

2. What sources and data do we use?

We process personal data which we receive from our prospective clients in the context of our discussion regarding a potential future business relationship. In addition, we also process personal data from publicly available sources (e. g., commercial registers and registers of associations, press, media, internet) which we lawfully obtain and are permitted to process.

Relevant personal data collected in dealing with prospective clients may be for example:

Name, address / other contact information (telephone, e-mail address), date / place of birth, gender, nationality, marital status, legal capacity, occupation / partner type (employed / self-employed), residential status (rental / ownership), financial situation, identification data (e. g., identification document data).

3. Why do we process your data (purpose of the processing) and on what legal basis?

We process the aforementioned personal data in compliance with the provisions of the Swiss Federal Act on Data Protection (FADP) and if applicable the EU General Data Protection Regulation (GDPR).

a. for the purposes of safeguarding legitimate interests

Where necessary, we process your data in order to safeguard the legitimate interests pursued by us or by a third party, e. g.,:

- Preventing crimes
- Video surveillance to safeguard against trespassers, to gather evidence in the event of robbery or fraud or to document disposals and deposits
- Measures for building and systems security (e. g., admittance control)
- Measures to ensure against trespassing

b. for the performance of contractual obligations

The processing of personal data is carried out in order to perform banking transactions and financial services pursuant to contracts with our clients or to take steps at your request prior to entering into a contract.

The purposes of the data processing and may include, among other things, requirements analysis, advice, asset management and transactional services. For further details on the purpose of the data processing, please refer to the respective contractual documentation and terms and conditions.

c. on the basis of your consent

Insofar as you have granted us consent to the processing of personal data for specific purposes (e. g., for marketing purposes), the lawfulness of such processing is based on your consent. Any consent granted may be revoked at any time. This also applies to the revocation of declarations of consent that are granted to us prior to the entry into force of the EU General Data Protection Regulation, i. e., prior to 25 May 2018 or any entry into force of the revised Swiss Federal Act on Data Protection. Please be advised that the revocation shall only have effect for the future. Any processing that was carried out prior to the revocation shall not be affected thereby. You can request a status overview of the consents you have granted from us at any time or view some of them when banking online.

d. for compliance with a legal obligation or in the public interest

As a bank, we are also subject to various legal obligations, e.g. Anti-Money Laundering Act (Geldwäschereigesetz). Other purposes of processing include identity and age verification, anti-fraud and anti-money laundering measures as well as the assessment and management of risks in the bank and the Group.



4. Who receives your data?

Within the bank, those offices are given access to your data which require them in order to present to you the bank and its services. Service providers and vicarious agents employed by us may also receive data if they observe banking secrecy and our written instructions under data protection law. These are mainly companies from the categories listed below.

With regard to the transfer of data to recipients outside the bank, it must first of all be noted that as a bank we are under a duty to maintain secrecy about any customer-related facts and evaluations of which we may have knowledge. We may only disclose information about you if we are legally required to do so, if you have given your consent or if processors commissioned by us guarantee compliance with banking secrecy and the provisions of the FADP and, if applicable, GDPR. Under these conditions, recipients of personal data may be, for example:

- Public authorities and institutions (e. g., Money Laundering Reporting Office Switzerland; Meldestelle für Geldwäscherei).
- Other service providers which assist the bank in organising events for and meetings with prospects or which provide services regarding support / maintenance of electronic data processing/ IT applications, archiving, document processing, data screening for anti-money laundering purposes, data destruction, real estate appraisals, IT services, marketing or telephony

Other recipients of data may be those offices to which you have given your consent to the transfer of data or with respect to which you have exempted us from banking secrecy / data protection by means of a declaration of consent.

5. Will data be transferred to a third country or to an international organisation?

Data will only be transferred to countries outside Switzerland (so-called third countries) if this is required for organising your future business relationship, in the context of outsourcing or if you have given us your consent. If service providers in a third country are used, they are obligated to comply with the same level of data protection as in Switzerland.

6. How long will your data be stored?

We process and store your personal data as long as there is an interest from your side and our side to have a future business relationship with you or is required for the performance of our statutory obligations.

If the data are no longer required they are regularly deleted, unless their further processing (for a limited time) is necessary for the following purposes:

- Compliance with records retention periods under the Money Laundering Act (Geldwäschereigesetz)
- Preservation of all forms of relevant information when litigation is ongoing or reasonably anticipated

7. What data protection rights do you have?

Under GDPR every data subject has a right of access a right to rectification, a right to erasure a right to restriction of processing a right to object and a right to data portability. If applicable data subjects also have a right to lodge a complaint with an appropriate data privacy regulatory authority. In general, but subject to certain differences or exceptions, similar rights are also granted by the Swiss Federal Act on Data Protection.

You may revoke your consent to the processing of personal data at any time. This also applies to the revocation of declarations of consent that are granted prior to the entry into force of the EU General Data Protection Regulation, i. e., prior to 25 May 2018 or any entry into force of the revised Swiss Federal Act on Data Protection. Please be advised that the revocation will only take effect in the future. Any processing that was carried out prior to the revocation shall not be affected thereby.

8. To what extent is automated decision-making (including profiling) carried out?

As a rule, we do not make decisions based solely on automated processing to establish and implement the business relationship. If we use these procedures in individual cases, we will inform you of this separately, provided that this is prescribed by law.

Information on your right to object under the EU General Data Protection Regulation (GDPR)

1. Ad hoc right to object

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on processing in the public interest and processing for the purposes of safeguarding legitimate interests; this includes any profiling based on GDPR provisions. If you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or unless the processing is for the establishment, exercise or defence of legal claims.

2. Right to object to the processing of data for marketing purposes

In certain cases, we process your personal data for direct marketing purposes. You have the right to object at any time to processing of personal data concerning yourself for such marketing, which includes profiling to the extent that it is related to such direct marketing. If you object to processing for direct marketing purposes, we will no longer process your personal data for such purposes. There are no formal requirements for lodging an objection; where possible it should be made by telephone to: + 41 22 739 0111.