



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

The following information provides an overview of how we process your personal data and your rights under data protection law. Which specific data are processed and how they are used depends largely on the services requested or agreed in each case.

Please also forward this information to your current and future authorised representatives, any beneficial owners or holders of any right on the account(s) (e.g. power of attorney, information right) as well as any co-obligors under a loan.

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

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

General Remarks

We process personal data which we receive from our existing clients in the context of the opening of an account relationship and of our business relationship. Personal data of former clients may also be processed. Personal data is also received from other persons such as persons who have received a power of attorney from a client, credit card holders, co-obligors under a loan (e.g. guarantor). To the extent necessary in order to provide our services, we also process personal data which we lawfully (e. g. for executing orders, performing contracts or on the basis of your consent) receive from other entities within the Deutsche Bank Group or other third parties (e. g., external asset manager). We also process personal data from publicly available sources (e. g., debtor directories, land registers, commercial registers and registers of associations, press, media, internet) which we lawfully obtain and are permitted to process.

Relevant personal data may be for example:

Name, address / other contact information (e.g. telephone, e-mail address), date / place of birth, gender, nationality, marital status, legal capacity, occupation/ partner type (employed / self-employed), identification data (e. g., identification document data), authentication data (e. g., specimen signature), tax information (e.g. tax-ID, FATCA status, tax residency status), and other KYC data.

Client contact information

In the business origination and development phase and over the course of the business relationship, particularly as a result of personal, telephone or written contact initiated by you or the bank, additional personal data is created, e. g. information about the contact channel, date, occasion and result, (electronic) copies of correspondence and information on participation in direct marketing activities.

Product and services

When we provide products / services from the categories listed below to you additional personal data may be collected, processed and stored in addition to the aforementioned data (incl. telephone, e-mail and other electronic conversations). These products / services primarily include:

Account and payment transactions (incl. online banking)

Order data (e. g. payment orders), data stemming from the performance of our contractual obligations (e. g., payment transaction data).

Securities, Derivatives, Foreign Exchange, Interest Rate, Fiduciary Deposits and other investments

Information on knowledge of and / or experience with various types of investments, investment behavior / strategy (scope, frequency, risk appetite), occupation, financial situation (assets, liabilities, income from (self-)employment / trade, expenses), foreseeable changes in financial circumstances (e. g. age of retirement), specific objectives / major concerns in the future (e. g. planned acquisitions, redemption of liabilities), tax information, documentation data (e. g. suitability statement, consultation records).

Life insurance

Policy number, product data (e. g. rate, benefit, premium), documentation data (e. g., consultation records). Where the premiums are invested in securities, the personal data listed under Securities, Derivatives, Foreign Exchange, Interest



Rate, Fiduciary Deposits and other investments" may be used.

Credit cards

Occupation, income, rental costs or construction financing rate, dependent children, residence / work permit.

Loans and structured financing

Credit records (income statements, cash flow accounts and balance sheets, tax documentation, information / proof of assets and liabilities, guarantees assumed, third-party account statements, expenses), employer, nature and term of the employment relationship, nature and term of self-employment, number of dependent children, marital property, residence / work permit, scoring / rating data, information / proof of intended purpose, own and external collateral: property documentation (e. g., land register extracts, property appraisals), documentation data (e. g., consultation records).

In the case of personal guarantees by third parties (external collateral), the bank may impose comparable requirements on the respective guarantors to disclose the economic and financial circumstances.

Digital services

With respect to personal data processed when using digital service products, please refer to further information on data protection in connection with the respective digital service product (for instance, processing personal data with e-banking).

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 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 are primarily dependent on the specific product (see no. 2) and may include, among other things, requirements analyses, advice, asset management and transactional services. For further details on the purpose of the data processing, please refer to the respective contractual documentation and general business conditions.

b. for the purposes of safeguarding legitimate interests

Where necessary, we process your data above and beyond the actual performance of our contractual obligations in order to safeguard the legitimate interests pursued by us or by a third party. Examples:

- Reviewing and optimizing procedures for needs assessment for the purpose of direct client discussions
- Advertising or market and opinion research, to the extent that you have not objected to having your data used
- Asserting legal claims and mounting a defence in the event of litigation
- Ensuring the bank's IT security and IT operations
- 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
- Measures to manage business and further develop services and products
- Group risk management

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. analysis of trading activities 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.

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. statutory requirements (e. g., Swiss Code of obligations (Obligationenrecht), Banking Act (Bankengesetz), Collective Investment Schemes Act (Kollektivanlagengesetz), Intermediated Securities Act (Bucheffectengesetz)), tax laws as well as laws regarding financial services and the supervision of financial institutions (Financial Market Infrastructure Act (Finanzmarktinfrastukturgesetz), Financial Market Supervision Act (Finanzmarktaufsichtsgesetz), Anti-Money Laundering Act (Geldwäschereigesetz)) as well as banking supervisory requirements. Other purposes of processing include credit checks, identity and age verification, anti-fraud and anti-money laundering measures, the satisfaction of tax law control and reporting obligations as well as the assessment and management of risks in the bank and the Group.

4. Who receives my data or who can access my data?

Within the bank, those offices are given access to your data which require them in order to perform our contractual and statutory obligations. Service providers and vicarious agents employed by us may also receive personal data for these



purposes 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 personal 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 (please see our general business conditions). We may only disclose information about you if we are legally required to do so, if you have given your consent, if we are authorized to provide bank information and / 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:

- Other entities of the Deutsche Bank Group
- Public authorities and institutions (e.g. Swiss Financial Market Supervisory Authority (Finanzmarktaufsicht), Federal Tax Administration (Eidgenössische Steuerverwaltung), Money Laundering Reporting Office Switzerland (Meldestelle für Geldwäscherei) or the German Bundesbank) insofar as a statutory or official obligation exists.
- Other credit and financial services institutions, comparable institutions and processors to whom we transfer personal data in order to perform the business relationship with you such as real estate appraisals, credit card processing, risk controlling, investment services, share register, fund management, auditing services, IT services, payment transactions.

Other recipients of personal 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 by means of a declaration of consent.

5. Will data be transferred to a third country?

Personal data is transferred within the Deutsche Bank Group and to third parties as set out in Section 4, and is also processed in other countries. We only transfer personal data abroad to countries which are considered to provide an adequate level of data protection, or in the absence of such legislation that guarantee adequate protection, based on appropriate safeguards (e.g., standard contractual clauses adopted by the European Commission or another statutory exemption) provided by local applicable law. If and to the extent required by applicable law, we implement the necessary legal, operational and technical measure and/or enter into an agreement with you before such transfers. A list of the countries in which Deutsche Bank Group operates can be found here: [Deutsche Bank Locations](#).

6. How long will my data be stored?

We process and store your personal data as long as it is necessary for the performance of our contractual and statutory obligations. In this regard, it should be noted that our business relationship is a continuing obligation designed to last for several years.

If the personal data are no longer required for the performance of our contractual and statutory obligations, they are regularly deleted or anonymized, unless their further processing (for a limited time) is necessary for the following purposes:

- Compliance with records retention periods under commercial and tax law, such as the Swiss Code of obligations (Obligationenrecht); the Money Laundering Act (Geldwäschereigesetz); the Federal Act on Archiving (Archivierungsgesetz), the Federal Act on Accounts Ordinance (Geschäftsbücherverordnung) and the Federal Act on Value Added Tax (Mehrwertsteuergesetz). The records retention periods prescribed therein range in general from two to 10 years. In exceptional cases a longer retention period is required;
- Due to requirements laid down by the Swiss Financial Market Supervisory Authority ("FINMA"), the bank is also obliged to record external and internal telephone calls of all employees engaged in securities trading. The bank must furthermore store all electronic correspondence (e-mails, communication via Bloomberg or Reuters, MS Teams, etc.) and evidence of the calls made on business telephones by these employees for a period of two years. The bank must also make this information available to FINMA on demand. This applies also to employees identified by a risk-based assessment as being highly exposed to information that has relevance to market supervision.
- Preservation of all forms of relevant information when litigation is ongoing or reasonably anticipated

7. Am I under any obligation to provide data?

Within the scope of our business relationship, you must provide personal data which is necessary for the initiation and execution of a business relationship and the performance of the associated contractual obligations or which we are legally obligated to collect. As a rule, we would not be able to enter into any contract or execute the order without these data or we may no longer be able to carry out an existing contract and would have to terminate it.

In particular, provisions of money laundering law require that we verify your identity before entering into the business relationship, for example, by means of your identity card and that we record your name, place of birth, date of birth, nationality and your residential address. In order for us to be able to comply with this statutory obligation, you must provide us with the necessary information and documents in accordance with the Anti-Money Laundering Act (Geldwäschereigesetz) and notify us without undue delay of any changes that may arise during the course of the business relationship. If you do not provide us with the necessary information and documents, we will not be allowed to enter into or continue your requested business relationship. Moreover, provisions of tax law regarding in particular FATCA and the automatic exchange of information requires us to receive from you the relevant tax data.



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.

9. Is “profiling” used?

In some cases, we process your data automatically with the aim of evaluating certain personal aspects (profiling). For instance, we use profiling in the following cases:

- We are required by law to take anti-money laundering and anti-fraud measures. Data evaluations are also carried out (in payment transactions, among other things) in this context. These measures also serve to protect you.
- In order to provide you with targeted information and advice on products, we use evaluation tools. These enable demand-oriented communication and advertising, including market and opinion research.

10. What data protection rights do I have?

You have a right to access and to obtain information regarding your data that we process. If you believe that any information we hold about you is incorrect or incomplete, you may also request the correction of your data. You also have the right to:

- object to the processing of your data;
- request the erasure of your data;
- request restriction on the processing of your data; and/or
- withdraw your consent where the bank obtained your consent to process personal data (without this withdrawal affecting the lawfulness of any processing that took place prior to the withdrawal). Where we process your data on the basis of your consent, or where such processing is necessary for entering into or performing our obligations under a contract with you, you may have the right to request your data be transferred to you (known as the ‘data portability’ right). You also have the right to ask the bank for information regarding some or all of the personal data we collect and process about you. The bank will honor such requests, withdrawal or objection as required under applicable data protection rules but these rights are not absolute: they do not always apply and exemptions may be engaged. We will usually, in response to a request, ask you to verify your identity and/or provide information that helps the bank to understand your request better. If we do not comply with your request, we will explain why.

11. Exercising your rights

To exercise the above rights, please contact:

Deutsche Bank (Switzerland) Ltd
Data protection officer
Hardstrasse 201, Prime Tower
8005 Zürich
Tel: +41 58 111 0111
E-mail: dbs.dpo@db.com

12. Changes to your data

We are committed to keeping your data accurate and up to date. Therefore, if your data changes, please inform us of the change as soon as possible.

13. Updates to this Notice

This Notice was updated in September 2023. We reserve the right to amend it from time to time. Any amendment or update to this Notice we will make available to you here: <https://country.db.com/switzerland/company/regulatory-information/data-protection-information>. Please visit the bank’s website frequently to understand the current Notice, as the terms of this Notice are closely related to you.

14. EU representative for Deutsche Bank (Schweiz) AG

The bank designated the below Deutsche Bank entity as the EU representative in compliance with Art. 27 EU GDPR:

Deutsche Bank AG
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