



# General Data protection information under the Swiss Federal Act on Data Protection and EU General Data Protection Regulation for authorized representatives / agents of legal entities

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 is explained below.

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 you contact in this regard?

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

We process personal data that we receive from you in your capacity as the authorised representative / agent of the legal entity (prospective and / or existing client). We also process personal data from publicly available sources (e. g., commercial registers and registers of associations media, Internet) which we lawfully obtain and are permitted to process.

Relevant personal data of the authorised representative / agent may be:

Name, address / other contact information (telephone, e-mail address), date / place of birth, gender, nationality, marital status, legal capacity, employed / self-employed, identification data (e. g., identification document data), authentication data (e. g., specimen signature).

When products / services are purchased and used, additional personal data may be collected, processed and stored in addition to the aforementioned data. These primarily include:

Information and records on knowledge of and / or experience with securities, interest rate / currency products / financial investments, suitability / appropriateness data.

Telephone, e-mail and other electronic conversations.

## 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 prior to entering into a contract. For further details on the purpose of the data processing, please refer to the respective contractual documentation and terms and 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 client contact, incl. 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. transfer of personal data within the Deutsche Bank Group or to third parties), the lawfulness of such processing is based on your consent. Any consent granted may be revoked at any time. 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 (Bucheffektengesetz)), 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 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 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.

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.

**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 you are authorised to represent the respective legal entity in dealings with us.

If the data are no longer required for the performance of our contractual and statutory obligations, they are regularly deleted, 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, 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 with the legal entity you represent in dealings with us, you must provide personal data which is necessary for accepting and executing any representative authority / authorisation 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 accept you as the authorised representative / agent without these data or we would have to revoke any existing representative authority / authorisation.

In particular, provisions of money laundering law require that we verify your identity before establishing the authority / authorisation, 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 (Geld-wäschereigesetz) 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 institute or continue the representative authority / authorisation requested by the respective legal entity.

## 8. 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.

## 9. 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](mailto:dbs.dpo@db.com)

## 10. 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.

## 11. 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.

## 12. 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  
Data Protection Officer  
Taunusanlage 12  
D-60325 Frankfurt am Main  
Tel: + 49 (69) 910-10000  
E-mail: [datenschutz.db@db.com](mailto:datenschutz.db@db.com)