

# Privacy policy statement

This privacy policy statement informs you about how Swisscanto Fund Management Company Ltd. handles your personal data.

## 1 General

In terms of data protection too, Swisscanto Funds Management Ltd. ("Swisscanto") is committed to an open, transparent and customer-friendly approach. By "personal data", Swisscanto means information relating to a particular or identifiable person. By "processing", Swisscanto means handling personal data, irrespective of the means and methods used, in particular the collection, storage, use, adaptation, publication, archiving or destruction of personal data.

Additional conditions (e.g. terms of use) apply to certain forms of data processing, such as those relating to Swisscanto's social media presence. These are available on the corresponding websites.

Swisscanto has delegated various tasks (such as asset management, distribution, IT, products, marketing, legal & compliance, risk management) to Zürcher Kantonalbank. Zürcher Kantonalbank applies equivalent technical and organisational measures to ensure privacy protection in the processing of personal data.

## 2 Data security

Swisscanto undertakes to protect your privacy in line with the applicable laws, in particular through the rules on business secrecy and the law governing data protection. Swisscanto takes numerous precautions to ensure this, as does Zürcher Kantonalbank, particularly as IT functions are delegated to the latter. These include the implementation of technical and organisational security measures (e.g. the use of firewalls, personal passwords and encryption and authentication technologies, access restrictions, awareness-raising and training of employees).

## 3 Scope of processing

### 3.1 Categories of personal data

Depending on which products and services it provides for you, Swisscanto may process the categories of personal data set out below. Swisscanto's policy is to process as little personal data as necessary.

Swisscanto processes customer data. This includes the following in particular:

- Master data and underlying data, e.g. name, address, date of birth, contract number and duration, documents confirming the customer's identity and information relating to the account, to transactions conducted or to third parties such as life companions, authorised agents and advisers who are also affected by the data processing.
- Fiscal domicile and any other documents and information of relevance to tax matters.
- Transaction or order management and risk management data, e.g. information on the beneficiary/beneficiary bank in the case of transfers, details on the issuing of mandates, information concerning your assets, investment products, cases of fraud.
- Business address/other contact details (e-mail address, telephone), gender, position in the company or job title.
- Personal data obtained in the course of the business relationship through contact in person, by telephone or in writing, e.g. information about the contact channel, date, occasion and outcome or (electronic) copies of correspondence.
- If applicable, recordings of telephone conversations between you and Swisscanto.
- Marketing data, e.g. requirements, wishes, preferences.
- Technical data, e.g. internal and external identifiers, trade numbers, IP addresses, records of accesses or changes.

Swisscanto processes data relating to potential customers and visitors (i.e. visitors to websites in particular). These include the following in particular:

- Master data and underlying data, e.g. name, address, date of birth.
- Technical data, e.g. internal and external identifiers, IP addresses, records of accesses or changes.
- Marketing data, e.g. requirements, wishes, preferences.

Swisscanto processes supplier data. These include the following in particular:

- Master data and underlying data, e.g. name, address, date of birth, contract number and duration, information relating to conducted transactions.
- Technical data, e.g. internal and external identifiers, trade numbers, IP addresses.
- Records of accesses or changes.

### 3.2 Origin

In order to fulfil the purposes according to point 3.4, Swisscanto can collect personal data with the following origin:

- Personal data communicated to Swisscanto, e.g. in connection with the opening of a business relationship, an advisory consultation or products and services, or on Swisscanto's websites.
- Personal data that is generated in connection with the use of products or services and is communicated to Swisscanto through the technical infrastructure or through collaborative processes, e.g. in connection with websites or in cooperation with other financial or IT service providers or marketplaces and exchanges.
- Personal data from third-party sources, e.g. authorities, other companies within the Zürcher Kantonalbank Group or sanction lists of the UN, SECO and the EU.

### 3.3 Duration of storage

The duration of storage of personal data depends on statutory record-keeping obligations and on the purpose for which the data in question is processed.

As a rule, Swisscanto stores personal data for the duration of the business relationship or the term of the contract and subsequently for a further five, ten or more years (depending on the applicable legal basis). This corresponds to the period within which legal claims can be brought against Swisscanto. Current or anticipated legal or supervisory authority proceedings can lead to data being stored beyond this period.

### 3.4 Purposes

Swisscanto can process the personal data described under point 3.1 for the provision of its own services as well as for its own purposes or those required by law. These include the following in particular:

- Customer registration procedures, and the conduct, processing and administration of the business relationship and of products and services.
- Statistics, planning or product development, business decisions (e.g. determination of key data on the use of services, capacity utilisation figures, transaction analyses, development of ideas for new products or the evaluation or improvement and review of existing products, services, processes, technologies, systems and financial returns).
- Monitoring and management of risks and business reviews, establishment of businesses, timely processing of business (e.g. combating fraud, product training etc.).
- Marketing, market research, comprehensive service, advice and information concerning the range of services offered, preparation and provision of tailor-made services (e.g. direct marketing, print and online advertising, customer, promotional or cultural events, sponsoring, prize games, measuring customer satisfaction, future customer needs or behaviour, or assessing customer, market or product potential).
- Statutory or regulatory information, disclosure or reporting obligations with respect to courts, authorities, compliance with official orders (e.g. the automatic exchange of information with foreign tax authorities, rulings issued by FINMA or public prosecutors' offices or in connection with money laundering or the financing of terrorism or for the purpose of recording and monitoring communications).
- Protecting Swisscanto's interests and securing its claims in cases where claims are brought against Swisscanto as well as protecting the security of customers and employees.
- Any other purposes of which Swisscanto has informed you.

### 3.5 Basis for the processing of personal data

Depending on which products and services Swisscanto may provide for you or the purpose for which the personal data is processed, the data processing is carried out on the following basis:

- conclusion or performance of a contract or commencement of a business relationship with you or for the purpose of fulfilling Swisscanto's obligation arising from such a contract or business relationship.
- where applicable, in order to protect Swisscanto's legitimate interests, e.g. statistics, planning or product development, business decisions; monitoring and management of risks, business reviews; marketing, market research, comprehensive service, advice and information concerning the range of services offered, preparation and provision of tailor-made services – where no objection has been lodged; protecting Swisscanto's interests and securing the claims of Swisscanto, its customers and employees.
- where applicable, in order to fulfil Swisscanto's statutory or regulatory obligations or perform duties in the public interest.
- where applicable, on the basis of your consent .

### 3.6 Are you subject to an obligation to provide personal data?

Where personal data which Swisscanto processes is required in order to fulfil statutory or regulatory obligations or for the conclusion or performance of a contract or the commencement of a business relationship with you, Swisscanto may not be able to accept you as a customer or provide you with products or services if it is unable to process this personal data. In this case we will inform you accordingly.

### 3.7 Existence of automated individual decision-making in individual cases, including profiling

Swisscanto also reserves the right in future to analyse and evaluate customer data (including data of affected third parties, see point 3.1) in automated form in order to identify key personal characteristics of the customer or to predict developments and create customer profiles. This may be used in particular for business reviews and to provide individual advice on – and provide – services and information which Swisscanto may make available to the customer.

Customer profiles may in the future also lead to automated individual decisions.

Swisscanto will ensure that a suitable contact person is available if the customer wishes to express an opinion concerning an automated individual decision and such a possibility of expressing an opinion is provided for by law.

### 3.8 Categories of intended recipients, guarantees and disclosure abroad

Within Swisscanto, only those departments receive access to your personal data which require it for the conclusion or performance of a contract or the commencement of a business relationship, for meeting statutory or regulatory obligations or for performing duties in the public interest.

Swisscanto only discloses customer data to third parties in the following cases – depending on the nature of the products and services used:

- for the execution of orders, i.e. in relation to the use of products or services, e.g. to payees, beneficiaries, authorised account users, intermediaries and other parties involved in a transaction, service providers, exchanges or marketplaces, or for reporting certain stock exchange transactions to international transaction registers.
- with the consent of the customer, to affiliated companies of Zürcher Kantonalbank for the purpose of providing comprehensive customer services and for the purpose of outsourcing.
- for reason of statutory obligations, on legal grounds or due to the issuing of official orders – e.g. to courts or supervisory authorities in the area of the law governing financial markets or tax matters or, where necessary, in order to protect Swisscanto's legitimate interests in Switzerland and abroad. The latter applies – especially in the event of legal steps or public statements against Swisscanto being threatened or initiated by the customer – in order to secure Swisscanto's claims against the customer or third parties and to restore contact with the customer after contact with the competent Swiss authorities has been broken off.

“Contract processors” are third parties that process personal data on behalf of and for the purposes of Swisscanto, e.g. Zürcher Kantonalbank, custodian banks, sales partners, asset managers, valuers, auditors, as well as IT, marketing, sales or communication service providers or consulting firms.

If personal data is communicated to such a contract processor, they may only process the personal data received in the same way as Swisscanto itself. Swisscanto selects its contract processors carefully and obliges them contractually to guarantee confidentiality and business secrecy in Switzerland as well as the security of the personal data.

Depending on the nature of the product or service being used, personal data may under certain circumstances also need to be disclosed to third parties (incl. contract processors) based in countries in which no adequate level of data protection prevails – the United States of America, for example, does not provide for an adequate level of data protection. When communicating personal data to such a country, Swisscanto requires the recipient to take appropriate measures to protect personal data (e.g. by agreeing so-called EU standard clauses or other precautions, or on the basis of justifying grounds; a copy of the EU standard clauses can be obtained from us free of charge).

#### **4 Rights**

You have the right to information, rectification, erasure, restriction and objection, and also – where applicable – the right to data portability. In addition, you have the right to lodge a complaint with a competent data protection supervisory authority (see point 6).

Swisscanto accepts information requests in writing together with a clearly legible copy of a valid official identity document (e.g. passport, identity card, driving licence) at the following address: Swisscanto Fund Management Ltd., Compliance, Postfach, 8010 Zurich.

The right to erasure and the right to object are not unlimited rights. Depending on the individual case, overriding interests may necessitate further processing. Swisscanto will examine each individual case and notify you of the result. If personal data is processed for the purpose of direct marketing, your right to object also extends to direct marketing, including profiling for marketing purposes. You can lodge an objection to direct marketing at any time by sending Swisscanto a notification to this effect (see point 6).

You can at any time withdraw your consent to Swisscanto processing your personal data. Please note that such a withdrawal of consent has only future effect. Processing which took place prior to withdrawal of consent is not affected.

If Swisscanto fails to meet your expectations with respect to the processing of personal data or if you wish to complain about Swisscanto's data protection practices or to exercise your rights, please notify Swisscanto accordingly (see point 6). Among other things, this gives Swisscanto the opportunity to address your concerns and, if appropriate, be make improvements. To assist Swisscanto in responding to your enquiry, we ask you to provide a correspondingly detailed notification. Swisscanto will address your concerns and reply within an appropriate period.

#### **5 Changes to personal data**

Swisscanto is obliged to process personal data accurately and keep it up to date. Please notify Swisscanto of any changes to your personal data by means of the usual communication channel.

#### **6 Contact details and exercising your rights**

Swisscanto is responsible for the processing of personal data.

You can also address your questions in connection with data protection to the following department:

Swisscanto Fund Management Ltd.  
Compliance  
Bahnhofstrasse 9  
8010 Zurich

E-mail address: [datenschutz@swisscanto.ch](mailto:datenschutz@swisscanto.ch)

If you are not satisfied with Swisscanto's response, you have the right to lodge a complaint with the data protection authority in the jurisdiction in which you live or work or at the place in which, in your view, a problem arose in relation to the personal data.

#### **7 Updating of the privacy policy statement**

This privacy policy statement explains in general terms the way your personal data is processed by Swisscanto. It is not a component of any contract between Swisscanto and yourself. Swisscanto reserves the right to amend this privacy policy statement from time to time. In the event of such an amendment you will be informed in an appropriate manner according to our usual means of communication with you, e.g. via the website [swisscanto.ch](http://swisscanto.ch).

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