

PRIVACY POLICY OF HYPOTHEKARBANK LENZBURG AG

1. Overview and scope

This Privacy Policy provides information on how and for what purposes Hypothekarbank Lenzburg AG (hereinafter referred to as «we» or «HBL») processes your personal data (hereinafter referred to as «you») which you disclose to us or which we collect from you. The present Privacy Policy is not exhaustive; General Terms and Conditions (GTC), Custody Account Conditions, Terms and Conditions for the Use of the Payment Card, information in leaflets (e.g. Information sheet on the disclosure of Client Data in connection with transactions and securities trading) and similar documents of HBL may govern further specific matters relevant to data protection. «**Personal data**» means any data and information relating to an identified or identifiable natural person.

2. Responsible person and contact points for data protection issues

The name and address of the controller are as follows:

Hypothekarbank Lenzburg AG
Legal & Regulatory (FADP Unit)
Bahnhofstrasse 2
5600 Lenzburg

Phone: +41 62 885 11 11
E-mail: datenschutz@hbl.ch

If you have any questions about data protection, please contact our addresses above.

3. Data origin and data categories

As a matter of principle, we only process personal data that we receive or collect from our customers, cooperation partners, interested parties and website visitors in the course of our business activities. To the extent permitted, we also obtain certain data from publicly accessible sources (e.g. debt enforcement register, commercial register, press, internet) or receive such data from other companies, from authorities or other third parties (e.g. offices, courts, sanction and embargo lists), from the Consumer Credit Information Office, from the Central Office for Credit Information, from credit agencies, credit checkers or address dealers, from card issuers, third-party banks or insurance companies, from media companies, anti-fraud agencies, pension funds or pension foundations. If you provide us with personal data of other persons (e.g. customers of cooperation partners or family members of customers), we ask you to ensure that these persons are aware of this Privacy Policy and only share their personal data with us if you have been permitted to do so and if the relevant personal data is correct.

The personal data or categories of personal data processed by us include, depending on the case, in particular **personal and contact data** (e.g. name, address, gender, date of birth, AHV number, marital status, number of children, place of origin and/or nationality, telephone number and e-mail address); **identification and background information** (e.g. passport number, ID number, AHV number, customer or account number, login data, specimen signatures, language, date of birth, nationality, languages, gender, denomination); **details of employment** (e.g. job title, employment relationship, salary,

bonus, any signing authorisations); **contractual data** which we receive or collect in connection with the initiation, conclusion and performance of contracts with you (e.g. goods and services claimed or requested by you and related behavioural and transactional data, financial data for payment purposes such as bank account details, assets, source of funds); **financial data** (e.g. scoring, rating and credit-worthiness data for lending purposes, information on your assets and their origin, savings targets and budget data, portfolios and watchlists, liabilities, income, sales and investments as well as data relating to your securities and other financial instruments, your knowledge and experience in investment matters, investment products, risk and investment profile, investment targets or information as required by foreign jurisdictions); **transaction data** (e.g. payment transaction data, details of your payment order as well as details of the payee or beneficiary and the purpose of the payment, details of deposits and withdrawals at ATMs); **pension data** (e.g. retirement assets, capital withdrawals, purchases); **tax data** (all relevant documents and information, in particular also details of denomination); details of **adult protection measures** (e.g. guardianships); details of the **processing of pension cases** (e.g. information on disability, health, retirement, death, purchase of residential property/real estate); **real estate data** (e.g. address of location, type of property, purchase price, market value, size of property, equipment, year of construction, condition, modernisations as well as other data in connection with the examination and processing of financing and/or the brokerage of real estate); **information for the processing of mortgages** (e.g. purchase contract and other contracts, tax returns, salary data, marital status); **communication data** (e.g. name and contact details such as postal address, email address and telephone number, content of emails, written correspondence, chat messages, social media posts, comments on websites and mobile apps, telephone calls, video conferences, proof of identity, marginal data); **documentary data** or data from your **contacts** with third parties (e.g. minutes of advice or conversations, file notes, references); **preference and marketing data** (e.g. data about the use of our website, apps or other digital offerings, data relating to the marketing of products and services such as newsletter sign-ups/sign-offs, documents received and special activities, personal preferences and interests); **public data** that can be obtained about you (e.g. land register and commercial register data, data from the media and the press); **data in connection with (potential) proceedings or investigations** by authorities, official agencies, courts, organisations or other bodies; **data for compliance with legal requirements**, such as anti-money laundering or in connection with export restrictions; **image and sound recordings** (e.g. photos, videos and sound recordings of customer events, recordings of video surveillance systems, photos, videos and sound recordings of courses, lectures, training sessions as well as recordings of telephone and video conference calls) and **technical data** (e.g. IP address and other device IDs, identification numbers assigned to your device by cookies and similar technologies).

4. Processing purposes and legal bases

4.1 Generally within the scope of our business activities

We process your personal data primarily for those processing purposes, which are necessary in connection with our business activities and the provision of our services. In particular, we may process your personal data for the following purposes:

- to **communicate with** you, in particular to provide you with information or to process your requests, to be able to authenticate and identify you, for customer service and customer care;
- for the **performance of contracts**, namely in connection with the initiation, conclusion and performance of contractual relationships. This includes all data processing that is necessary or expedient to conclude, execute and, if applicable, enforce a contract, such as processing to decide whether

and how (e.g. with which payment options) we enter into a contract with you (including credit checks), to provide contractually agreed services, e.g. to provide services and functions (including personalised service components), to bill our services and to process your order, to provide services and functions (including personalised service components), to invoice our services and generally for accounting purposes, to process applications (e.g. managing and evaluating applications, conducting interviews including creating personality profiles, obtaining reference information), to enforce legal claims arising from contracts (debt collection, legal proceedings, etc.);

- to **provide** you with our products and services as well as our digital offers (e.g. website, mobile app, etc.) and to **evaluate** and **improve** them, including market research, quality assurance and training of our employees;
- for the **mediation of third-party products and services**: We process your personal data so that we can mediate offers from our cooperation partners to you if you are interested (e.g. when using mobile apps);
- for **customer care** and **marketing purposes**, e.g. to send you written and electronic communications and offers and to carry out marketing campaigns. These may be our own offers or offers from our advertising partners. We may also process your personal data in part automatically with the aim of evaluating certain personal aspects (profiling) or to create a pre-selection when you enquire about a product or service. In particular, we may use profiling to provide you with targeted information about products and services;
- in connection with **accounting, archiving** data and managing our archives;
- for **training and education**: we may process your personal data to provide internal training and to train and develop our employees;
- when **selling receivables**, e.g. if we provide the purchaser with information about the reason for and amount of the receivable and, if applicable, the creditworthiness and conduct of the debtor;
- for **security measures**, namely IT and building security (such as access controls, visitor lists, prevention, defence and resolution of cyberattacks and malware attacks, network and mail scanners, video surveillance, telephone records) as well as for the prevention and resolution of criminal offences and other misconduct or conducting internal investigations, protection against misuse, evidentiary purposes, data analysis to combat fraud, evaluation of system-side records of the use of our systems (log data);
- in connection with **restructurings** or other **corporate actions** (e.g. due diligence, sale of companies, keeping share registers, etc.);
- for the **assertion of legal claims** and **defence** in connection with legal disputes as well as official proceedings at home and abroad, including the clarification of litigation prospects and other legal, economic and other issues;
- to comply with our **legal, regulatory** (including self-regulations) and **internal requirements** and **rules** at home and abroad, including compliance with orders of a court or authority as well as clarifications via cooperation partners. We are subject to legal and internal requirements (e.g. in connection with combating money laundering, abuse and fraud);
- other purposes: we may process your personal data for other purposes that are necessary to protect our **legitimate interests**.

We process your personal data for the above purposes, depending on the situation, in particular based on the following legal bases:

- the processing of personal data is necessary for the performance of a contract with you or pre-contractual measures;
- you have given your consent to the processing of personal data relating to you;
- the processing of personal data is necessary for compliance with a legal obligation;
- the processing is necessary to protect the vital interests of the data subject or another natural person;
or
- we have a legitimate interest in processing the personal data and our legitimate interests may include, in particular, the following interests – interest in: providing good customer service, keeping in touch and communicating with customers outside of a contract; in promotional and marketing activities; improving products and services and developing new ones; in combating fraud and preventing and investigating offences; protecting customers, employees and others and our data, trade secrets and assets; ensuring adequate security (both physical and digital); ensuring and organising business operations, including the operation and the further development of websites and other systems; managing and developing our business; selling or buying companies, parts of companies and other assets; enforcing or defending legal claims; complying with Swiss and foreign law and other rules applicable to us.

4.2 Profiling

HBL processes personal data partly automatically in order to evaluate certain personal aspects («profiling»). Profiling is used in particular in the following cases:

- to combat money laundering, terrorist financing and offences endangering assets (including payment transactions);
- for targeted communication and advertising, including market research and the design of the range of products and services;
- as part of the credit check (e.g. assessment of creditworthiness and calculation of affordability).

4.3 When visiting our website

Our website collects a range of user information with each call, which is stored in the server's log files. The information collected includes, among other things, the IP address, the date and time of access, the time zone difference from the GMT time zone, the name and URL of the file accessed, the website from which access was made, the browser used and the operating system used. The collection of this information or data is technically necessary to display our website to you and to ensure its stability and security. This information is also collected to improve the website and analyse its use.

4.4 E-mail, telephone calls and video conferences

You can contact us via the e-mail address and telephone number provided. The personal data you send us will be stored by us and processed for the purpose of dealing with your enquiry.

If you contact us by e-mail, you authorise us to reply to you via the same channel. Please note that unencrypted e-mails are transmitted via the open internet, which is why it cannot be ruled out that they can be viewed, accessed and manipulated by third parties. We exclude – as far as legally permissible – any liability which you may incur in particular as a result of faulty transmission, falsification of content or disruption of the network (interruptions, overload, illegal interventions, blocking).

Telephone and video conference calls with us may be recorded; we will inform you of this at the beginning of each call. If you do not want us to record such conversations, you have the option to terminate the conversation at any time and contact us by other means (e.g. by e-mail or post).

4.5 Contact form

You can contact us using the contact form provided on our website. The personal data you send us will be stored by us and processed for the purpose of dealing with your enquiry.

4.6 Cookies

We may use cookies, which are text files that are stored in the internet browser or by the internet browser on the computer system of the user or a mobile end device. The cookie contains a characteristic string of characters that enables the browser or mobile end device to be uniquely identified when the website is called up again.

The purpose of using cookies is, on the one hand, to enable and simplify the use of our website for you. Some functions of our website cannot be offered without the use of cookies (so-called technically necessary cookies). On the other hand, we also use cookies/tools to analyse user behaviour on our website, namely for range measurement.

4.6.1 Technically necessary cookies

Technically necessary cookies are required for our website to function. Therefore, these cookies cannot be switched off in our systems. They usually record important actions, such as the number of requests made, editing your privacy settings or filling out forms. Although you can block these cookies in your browser, some parts of our website may then no longer function.

4.6.2 Analytical and marketing cookies

Analytical cookies allow us to analyse visitor behaviour and traffic sources so that we can measure the performance of our website and improve the user experience. They help us to see how popular which pages are and show how visitors move around our website.

Marketing cookies allow us to deliver advertising that is relevant to you. These cookies may remember that you have visited our website and share this information with other companies, including other advertisers.

Specifically, we use the following analytics and marketing cookies:

- Google Analytics of Google Ireland Ltd., Ireland (hereinafter «**Google**»). The privacy policy for Google Analytics can be found here: <https://policies.google.com/privacy>;

- Google Remarketing by Google. The privacy policy for Google Remarketing can be found here: <https://policies.google.com/privacy>.

You can object to the use of cookies, for example (i) by selecting the appropriate settings in your browser, (ii) by using appropriate cookie blocker software (e.g. ghostery etc.) or (iii) by downloading and installing the browser plug-in available at the following link regarding cookies from Google: <https://tools.google.com/dlpage/gaoptout?hl=en>.

4.7 Newsletter

If you subscribe to our newsletter, we use your e-mail address and other contact data to send you our news. The newsletter is sent using the dispatch service provider CleverReach GmbH & Co. KG, which is based in Germany. You can find the privacy policy here: <https://www.cleverreach.com/en-de/privacy-policy/>.

By registering for our newsletter, you consent to the associated processing of your personal data. Mandatory data for sending the newsletter are your name and your e-mail address, which we store after your registration. You can revoke your consent at any time and unsubscribe from our newsletter delivery. You can declare the revocation by clicking on the link provided in each news e-mail, by e-mail to datenschutz@hbl.ch or by sending a message to our above-mentioned postal address.

4.8 Social Media Plug-ins

We may use the social media plug-ins listed in the following table on our website. We use the so-called two-click solution, whereby no personal data is initially passed on to the providers of the plug-ins when you visit our website. Only when you click on the marked plug-in field and thereby activate it, does the plug-in provider receive the information that you have accessed our website. In addition, the personal data described in section 4.2 of this Privacy Policy will be transmitted.

We have no influence on the data collected and data processing procedures of the plug-in providers. These are subject to the respective privacy policies of the third-party providers. For further information on the purpose and scope of data collection and processing by the plug-in provider, please refer to the privacy policies of these providers provided below.

Plug-in	Provider and privacy policy
YouTube	Google: https://policies.google.com/privacy
Facebook	Meta Platforms Ireland Limited: https://www.facebook.com/about/privacy/update?ref=old_policy
LinkedIn	LinkedIn Ireland Unlimited Company: https://www.linkedin.com/legal/privacy-policy
Twitter	Twitter International Unlimited Company: https://twitter.com/en/privacy

4.9 Applications

You can submit your application for a position with us by post or by e-mail. The application documents and all personal data disclosed to us with them will only be processed for the purpose of processing your application for employment with us. Without your consent to the contrary, your application file will either be returned to you or deleted/destroyed after the application process has been completed, unless it is subject to a legal duty of safe-keeping.

5. Disclosure of personal data to recipients and abroad

5.1 Disclosure of personal data to recipients

In addition to the data transfers to recipients expressly mentioned in this Privacy Policy, we may disclose personal data to the following categories of recipients, where permitted:

- providers to whom we have outsourced certain services (e.g. IT and hosting providers, advertising and marketing services, company administration, including accounting and/or asset management, collection services, photographers, payment service providers, banks, insurance companies, etc.) as well as other suppliers and subcontractors;
- cooperation partner of the HBL;
- contractual partners, customers and other persons involved: if you are working for a contractual partner of ours (e.g. a customer or supplier), we may disclose data about you to them. We may also disclose personal data to persons acting on your behalf (agents) or who are otherwise involved in the performance of the contract;
- third parties involved in the execution of client orders or transactions and the provision of services (e.g. brokers, counterparties, market operators, payees, issuers, exchanges, clearing houses, central securities depositories, dealers and other service providers);
- third-party providers of software applications and mobile apps used by customers in connection with our digital offerings;
- third parties who collect data about you via websites or mobile apps;
- consultancy service providers, e.g. tax consultants, lawyers, management consultants;
- external investment advisors, brokers and asset managers;
- authorised representative;
- insurance, social insurance;
- credit bureaus, which store this data for credit rating information;
- prospective purchasers or investors in the event of restructuring or other corporate actions;
- auditors, Supervision;
- parties to potential or actual legal proceedings or litigation;
- domestic and foreign authorities, official agencies or courts.

Within the scope of our legal obligations, your personal data will be passed on to the Consumer Credit Information Office [Informationsstelle für Konsumkredit (IKO)]. For further details see <https://www.iko-info.ch/de-ch/uber-uns>.

As part of our regulatory obligations, your personal data will be passed on to the Central Office for Credit Information [Zentralstelle für Kreditinformationen (ZEK)], which may transmit the data to its members. For further details see <https://www.zek.ch/de-ch/uber-uns>.

5.2 Disclosure of personal data abroad

In principle, we process your personal data in Switzerland. However, in certain cases (e.g. when using certain service providers or certain software applications), your personal data may also be transferred abroad, primarily to the member states of the European Union and EFTA, but also in some cases to other countries worldwide, in particular to the USA (primarily in connection with cookies, social media plug-ins and other third-party software applications).

If we transfer data to a country without adequate legal data protection, we ensure an adequate level of protection as provided for by law by using appropriate contracts (namely on the basis of the so-called “standard contractual clauses” of the European Commission) or rely on the legal exceptions of consent, the execution of the contract, the establishment, exercise or enforcement of legal claims, the overriding public interests, the published personal data or because it is necessary to protect the integrity of the data subjects. Nevertheless, we would like to point out that data transmitted abroad is no longer protected by Swiss law and foreign laws as well as official orders may demand that this data be passed on to authorities and other third parties.

6. Retention period

We process and store your personal data for as long as it is necessary for the fulfilment of our contractual and legal obligations or otherwise for the purposes pursued with the processing, or for as long as there is another legal basis (e.g. statutory retention periods) for doing so. We retain personal data that we hold on the basis of a contractual relationship with you at least as long as the contractual relationship exists and prescriptive period for possible claims by us run or contractual retention obligations exist.

7. Your rights

Within the framework of the data protection law applicable to you and insofar as provided therein, you have the right to information, correction, deletion, the right to restrict data processing and otherwise to object to our data processing as well as to the release of certain personal data for the purpose of transfer to another body (so-called data portability). Please note, however, that we reserve the right to enforce the restrictions provided for by law, for example if we are obliged to retain or process certain data, if we have an overriding interest in doing so (insofar as we are entitled to rely on this) or if we need the data to assert claims. If you incur costs, we will inform you in advance.

If data processing is based on your consent, you can revoke this at any time after giving your consent with effect for the future. However, this does not affect the lawfulness of the processing carried out on the basis of the consent until the revocation.

The exercise of such rights generally requires that you clearly prove your identity (e.g. by means of a copy of your identity card if your identity is otherwise not clear or cannot be verified). To exercise your rights, you can contact us at the addresses set out in para. 2 of this Privacy Policy (by post or e-mail). Alternatively, you can also use the contact form at <https://www.hbl.ch/de/ueber-uns/kontakt-support/kontaktformular/>.

In addition, every data subject has the right to enforce his or her claims in court or to lodge a complaint with the competent data protection authority. The competent data protection authority in Switzerland is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

8. Data security

We take appropriate security measures of a technical and organisational nature to maintain the security of your personal data, namely to protect it against unauthorised or unlawful processing and to counteract the risk of loss, unintentional modification, unauthorised disclosure or unauthorised access. However, like all companies or public institutions, we cannot rule out data security breaches with absolute certainty because certain residual risks are unavoidable. As part of our security measures, we use firewalls, logging and encryption in particular, have authorisation concepts and have implemented other protective measures to ensure the most complete possible protection of personal data.

9. Adjustments to this Privacy Policy

We reserve the right to amend this Privacy Policy at any time. In the event of such a change, we will immediately publish the amended Privacy Policy on our website. The Privacy Policy published on our website is valid at all times.

October 2023