

Privacy Policy

1. Who we are and what this policy covers

HBL Vested Benefits Foundation, with its registered office in Lenzburg (hereinafter referred to as the 'Foundation', 'we' or 'us'), is a legally independent vested benefits foundation within the meaning of the Vested Benefits Act (VBA). It is subject to the supervision of the relevant foundation supervisory authority.

This Privacy Policy informs you about how we process personal data relating to account holders of vested benefits, beneficiaries, legal representatives, contact persons, interested parties and other data subjects in connection with the administration of vested benefits.

2. What personal data we process

In particular, we process the following categories of personal data:

- Master data (e.g. surname, first name, address, date of birth, AHV number, marital status, nationality)
- Contact and communication details (e.g. telephone number, email address, correspondence with the Foundation)
- Contract and pension data (e.g. vested benefits account numbers, amount of vested benefits, proportion of BVG assets, blocking periods, WEF early withdrawals, pledges, divorce and pension settlement data)
- Financial and payment data (e.g. transfers to new pension institutions, lump-sum payments, bank details, withholding tax deductions, notifications to tax authorities)
- Technical data relating to the use of our online services (e.g. date and time of access, log data).

3. Purposes and legal bases for data processing

We process personal data primarily to fulfil our foundation's purpose and to manage vested benefits arrangements. This includes, in particular:

- Opening, maintaining and managing vested benefits accounts and any vested benefits deposits
- Verification and execution of transfers to pension funds or other vested benefits institutions
- Verifying and processing cash payments, WEF advance withdrawals and pledges
- Verifying the entitlement of beneficiaries and paying out benefits in the event of death or disability
- Fulfilment of statutory obligations (e.g. notifications to tax authorities, registration and removal of restrictions on disposal in the land register, compliance with regulatory requirements, combating money laundering and terrorist financing)
- Risk management, internal control system (ICS), governance, reporting to the Board of Trustees, the supervisory authority and the auditors
- Communication with account holders, beneficiaries, pension schemes, authorities, partners and other stakeholders

The legal basis comprises, in particular, the Swiss Data Protection Act (DSG), the Vested Benefits Act (FZG) and the Vested Benefits Ordinance (FZV), the BVG, as well as the applicable

tax provisions (DBG, StHG) and the Foundation's deed of incorporation and regulations.

4. Source of the data

We generally receive personal data directly from account holders (e.g. when opening a vested benefits account, in the event of changes to account details, when submitting claims for benefits or in correspondence).

In addition, we also receive data from third parties, e.g. from:

- previous or new pension institutions (e.g. exit statements, supplementary vested benefits data)
- cooperation partners (e.g. Finstar banks, asset managers, fintech partners) as part of the account opening process
- tax authorities, supervisory authorities or courts
- the auditors and other commissioned service providers

5. Recipients of personal data

We disclose personal data, to the extent permitted and required by law, in particular to the following recipients:

- the bank maintaining the account and custody account, the asset manager, service providers engaged by them, and other cooperation partners
- Distribution partners in an umbrella structure, to the extent necessary for the administration of the pension scheme member
- other pension or vested benefits schemes in the event of transfers
- Land registries in connection with WEF early withdrawals and restrictions on disposal
- Tax authorities (e.g. Federal Tax Administration, cantonal tax authorities) in connection with capital gains reporting or withholding tax deductions
- Supervisory authorities (in particular the Foundation Supervisory Authority) and the auditors

Where third parties process data on our behalf, we ensure, through appropriate contractual arrangements, that they comply with data protection regulations and our instructions.

6. Profiling

We process personal data, in part by automated means, to evaluate certain personal characteristics ('profiling'). Profiling is used in particular for targeted communication and advertising, including market research, as well as for tailoring our range of products and services.

7. Email and telephone calls

You can contact us by email and telephone. The personal data you provide to us is stored by us and processed to deal with your enquiry. If you contact us by email, you authorise us to reply to you via the same channel.

Please note that unencrypted emails are transmitted via the public open internet, which is why it cannot be ruled out that they

may be visible to, accessible by or subject to manipulation by third parties. We exclude – to the extent permitted by law any liability arising, in particular, as a result of faulty transmission, falsification of content or network disruptions (interruptions, overload, unlawful interference, blocking).

8. Cookies and plug-ins

We may use cookies on our website. Cookies are text files that are stored in the web browser or by the web browser on the user's computer system or mobile device. A cookie contains a distinctive string of characters that enables the browser or mobile device to be uniquely identified when the website is visited again. The purpose of using cookies is to enable and simplify your use of our website. Some features of our website cannot be provided without the use of cookies. We also use cookies to analyse user behaviour on our website, specifically to measure reach. Finally, we also use so-called marketing cookies. These enable us to deliver advertising that is relevant to you. These cookies record that you have visited our website and may pass this information on to other companies, including other advertisers.

We use the following analytics and marketing cookies: Google Analytics from Google Ireland Ltd., and Google Remarketing from Google. You can object to the use of cookies, for example (i) by selecting the appropriate settings in your browser, (ii) by using appropriate cookie-blocking software (e.g. Ghostery, etc.) or

(iii) by downloading and installing the browser plug-in available via the following link for Google cookies: <https://tools.google.com/dlpage/gaoptout?hl=de>. We may use the following social media plug-ins on our website: YouTube, Facebook, LinkedIn and X. Plug-ins are pieces of software from providers embedded on our website which extend the functionality of our website with specific features such as social media integrations. We use the so-called 'two-click' solution, whereby, when you visit our website, no personal data is initially passed on to the plug-in providers. Only when you click on the highlighted plug-in field and thereby activate it does the plug-in provider receive the information that you have visited our website. Data is also transmitted to them. We have no influence over the data collected or the data processing operations carried out by the plug-in providers.

9. Transfer of data abroad

Our data processing takes place primarily in Switzerland. Personal data is only transferred abroad if this is necessary in individual cases (e.g. when providing services to persons resident abroad or when using certain IT service providers) and the legal requirements are met (in particular, adequate data protection or appropriate safeguards).

10. Retention period

We retain personal data only for as long as is necessary to fulfil our foundation's purpose, to process vested benefits arrangements and to comply with statutory retention periods. As a rule,

data is retained for the entire duration of the vested benefits arrangement and beyond, for the periods prescribed by law (in particular under pension, tax and supervisory legislation).

11. Data security

We take appropriate technical and organisational measures to protect personal data against loss, misuse, unauthorised access, unauthorised disclosure or any other unauthorised processing.

12. Rights of data subjects

Data subjects have the following rights in particular under applicable law:

- Right to access the personal data processed about them
- The right to have inaccurate or incomplete data rectified
- Right to erasure or restriction of processing, provided this does not conflict with any legal or contractual obligations
- Right to object to certain processing activities

To exercise these rights, you may contact us using the contact details provided below. You also have the option of lodging a complaint with the relevant data protection authority. The relevant data protection authority in Switzerland is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

13. Data controller and point of contact for data protection matters

HBL Vested Benefits Foundation
PO Box
5600 Lenzburg
Email: info@hbl-vorsorge.ch

14. Updates to this Privacy Policy

We may amend this privacy policy at any time. The version currently published on the Foundation's homepage shall prevail.