

Information Brochure

Information on the Disclosure of Client Data for Payment Transactions, for Transactions in Securities and Other Financial Instruments, and for Services, Especially with a Foreign Connection

In this letter, you will find important information regarding the disclosure of client data in connection with transactions and services that the bank provides you with, such as

- Payment transactions (incoming and outgoing payments),
- Purchase, receipt and delivery, custody and sale of securities and other financial instruments and/or safekeeping account assets,
- Other transactions and services such as foreign exchange and precious metals transactions and derivatives/OTC transactions,

especially those with a foreign connection.

This letter explains the relevant provision contained in Art. 16 c) of the General Conditions of Credit Suisse (Switzerland) Ltd. (hereinafter referred to as *the Bank*) and supplements the brochures regarding the disclosure of client details issued by the Swiss Bankers Association (SBA). Please note that Art. 16 c) of the General Conditions of the Bank should also be understood as a supplement to Art. 17 of the Conditions for Payment Transactions of the Bank.

Global Developments

Worldwide, there is an increase and escalation of laws, regulations, contractual and other provisions, business and trade practices, as well as compliance standards, that are potentially relevant to the transactions and services offered by the Bank. This development means that, for transactions and services, increased transparency and disclosure of data to third parties in Switzerland and abroad may be required; the latter may be required especially in cross-border payment transactions, payment transactions, or any other transactions and services

involving foreign currencies, when foreign exchanges or trading partners are involved or in connection with foreign securities and other financial instruments and/or safekeeping account assets.

Scope and Purpose

The basis for the disclosure in connection with the aforementioned transactions and services differs from country to country, according to local conditions, or according to the requirements of the third parties involved in the transactions and services. Disclosure may be required to enable the Bank, in individual cases or in general, to execute or provide the relevant transactions or services, or to generally comply with laws and regulations, contractual and other provisions, business and trade practices, as well as compliance standards, that are potentially relevant for the aforementioned transactions and services in a country or transaction with involved third parties. For instance, this may be the case

- if local licenses require it,
- if it is required as part of registration (e.g. for the registration of transactions or securities),
- if client rights must be asserted (e.g. for the execution of corporate actions in connection with safekeeping account assets in custody),
- in connection with locally applicable holding limits or holding regulations,
- to comply with local disclosure or reporting obligations,
- to comply with contractual provisions, and other rules, business practices, trade practices, by the Bank and by third parties that are involved in the transactions and services, respectively,
- because the compliance standards of involved third parties requires the proactive disclosure of relevant information or can trigger queries at the Bank (e.g. due to the monitoring systems used), especially in the fight against money laundering, terrorist financing, or corruption, as well as in relation to sanctions or politically exposed persons (PEP).

Examples: Disclosure of information by the Bank regarding individual transactions and their background, as well as transmission of documents, such as passport copies, to enable the processing of a client instruction or a response to a request from a correspondent bank concerning money laundering or sanctions.

Furthermore, exclusion of liability applies if the bank is prevented from disclosing client data for legal or regulatory reasons.

Affected Data

Data that may need to be disclosed for transactions and services varies from case to case and may include:

- information about the client, authorized representatives, beneficial owners, and other involved parties (e.g. name, registered office, domicile, address, nationality of these persons),
- information about the affected transactions or services (e.g. purpose, economic background, and other background information about the transactions and services), as well as
- information on the client's business relationship with the Bank (e.g. scope, status, purpose, historical data, other transactions executed in the course of the business relationship).

Type and Time of Disclosure

The information can be disclosed through any means. In particular, this includes transfer via telecommunications (including electronic data transmission), but also the physical transmission of documents (e.g. passport copies). Disclosure may be required before, during, and after the execution of a transaction or service.

Information Recipients

Involved third parties who qualify as information recipients are for instance stock exchanges, brokers, banks (especially correspondent banks), trade repositories, processing units and third-party custodians, issuers (including fund companies and transfer agents), authorities or their representatives, and other companies involved in the transactions or services in Switzerland and abroad. It is possible that such third parties will communicate the received information to other parties. For instance, they may entrust processing to their own processing centers.

Some foreign countries, namely the member states of the European Union, allow access to beneficial ownership information through public registers, so that third parties are able to ascertain, throughout the Union, who are the beneficial owners of corporate and other legal entities as well as of certain types of trusts and similar legal arrangements. Such data may be viewable by other persons and authorities (including tax and criminal authorities) or even publicly accessible (e.g. register of beneficial owners). Furthermore, such data is subject to the data protection rules applicable in the country maintaining the register.

Data Security in Switzerland and Abroad

Security is an integral part of the Bank. For this reason, it protects the data of its clients with proven security standards following security systems and processes, and develops them on an ongoing basis. All group companies of the Bank in Switzerland and abroad are subject to these security standards and are regularly reviewed.

If data is made available to an information recipient abroad, the bank client confidentiality protection guaranteed by Swiss law no longer applies. Furthermore, data may reach countries that guarantee less extensive data protection than Switzerland.

Contact

Your client advisor or contact center will be pleased to help if you have any questions.

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