

# Credit Suisse Privacy Policy

Please read this privacy policy (the **“Privacy Policy”**) as it describes how we intend to collect, use, store, share, and safeguard your information. By accessing, visiting or using this App (as defined in the Credit Suisse Private Banking Asia Pacific App Agreements and Privacy Policy ), you expressly consent to our collection, use, disclosure, and retention of your information as described in this Privacy Policy.

Terms defined in this Privacy Policy shall apply only in respect of this Privacy Policy. References in this Privacy Policy to provisions **“above”** and **“below”** are to provisions of this Privacy Policy.

## 1. Our Commitment to Protecting Your Personal Data

Credit Suisse Group AG, including all branches, representative offices, subsidiaries, and associated and affiliated companies, of Credit Suisse Group AG, wherever located, (together or separately, **“we”**, **“us”**, **“our”** or **“Credit Suisse”**) are committed to maintaining the privacy of each of their respective current, former and/or prospective customers (**“you”**). We recognise that you entrust important personal data (such as, without limitation, data that can be used to identify an individual) to us, and we wish to assure you that we take seriously our responsibilities in protecting and safeguarding this information. We pledge to meet fully the requirements of applicable personal Data Protection Laws (as defined in Section I of the Agreements and Privacy Policy) to ensure our compliance with the strictest standards of security and confidentiality.

Credit Suisse may have entered or enter into separate agreements, or terms and conditions, (including Section II of the Agreements and Privacy Policy) with you that contain specific data protection provisions and, in such circumstances, the terms of those agreements, and terms and conditions, shall prevail over the terms of this Privacy Policy in the context of your use of this App.

## 2. Privacy Policy Statement

This Privacy Policy sets out our rules on data protection and the legal conditions imposed on us under applicable Data Protection Laws in relation to the collection, handling, processing, storage, use, transportation and destruction of personal data by Credit Suisse and any third party dealing with personal data on our behalf, in connection with this App. We require that all members of staff, and any third party dealing with personal data on our behalf, comply fully with the terms of this Privacy Policy and any other instructions relating to data protection that may be issued or updated by us from time to time.

## 3. Lawful and Fair Collection of Personal Data

- 3.1 From time to time, it may be necessary for you to supply us with your personal data in connection with the use of this App and/or our provision of services (in addition to personal data that you otherwise provide to us in connection with your client relationship with us). We may also collect personal data about you from publically available sources (e.g. the Internet and social media websites). We may also collect and process details of your usage of this App. We will collect and process such personal data only to the extent permissible under applicable Data Protection Laws.
- 3.2 Examples of personal data that we may collect or process in connection with this App include, but are not limited to: your name, user ID; virtual name (the name chosen by you as the user of this App before, upon or after sign-in) and contact information (e.g. address, e-mail address, phone number, etc.); account, transaction and financial information; online behavioural, preference and collaboration information (e.g. statistics on page views, traffic data, user preferences, location data and communication data); sign-in information; information about the hardware and/or software you use to access the App (e.g. browser, device, platform etc.); internet protocol (IP) address; Wi-Fi connection information, web log information and other related information necessary for your relationship with us.

## 4. Use of Personal Data only for Legitimate Purposes

- 4.1 Personal data we collect from you via this App (along with personal data that you otherwise provide to us connection with your client relationship with us) may be used by us or our third party service providers to provide you with our products and services (which may include financial, banking, securities, advisory, investment products and services, including but not limited to derivatives, securities trading, commodity, equity and fixed income sales, prime services (including execution, brokerage, settlement, give-up, clearing, custody, reporting and financing services), exchanged-traded funds and mortgages) (our **“Products and Services”**); to confirm your identity; to enable you to use this App; to improve user experience; to administer our business; to maintain our records; to communicate with you (including sending alerts, notifications, updates, content or information); to conduct statistical analysis and better understand client interaction/behaviour/satisfaction; to enhance and support our operations; to conduct audits; to manage our risks to carry out servicing,

maintenance and security of the App; to market our Products and Services; to tailor our offerings to you; and to the extent necessary to comply with court orders, law, rules, regulations, codes of practice, guidelines or requests applicable to us (including reporting to regulators, trade depositories, or responding to requests from law enforcement authorities or governmental agencies).

- 4.2 Further information about the purposes for which we may use your personal data may be contained in privacy notifications provided to you on or before collection of your personal data, our agreements with you, or our terms and conditions which govern our relationship with you. Any processing of your personal data will be only for those specified purposes or for any other purposes specifically permitted by applicable Data Protection Laws. If it becomes necessary to change the purpose(s) for which the data is processed, we will inform you of the new purpose(s) and obtain your consent before any processing occurs.

## 5. Cookies

- 5.1 All of our websites utilise a standard technology called "cookies" to collect information about how our websites are used, which may include your personal data. The use of cookies is essential to the operation of our websites. If you access this App via the web, you may opt-out of receiving cookies by disabling cookie support but doing so may prevent the App from functioning properly and you may not be able to utilise fully all of its features and information.
- 5.2 **What is a Cookie.** A cookie is a very small text document, which often includes an anonymous unique identifier. When you visit a website, that website's computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies. Each website can send its own cookie to your browser if your browser's preferences allow it, but (to protect your privacy) your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other websites. A cookie cannot retrieve any other data from your hard drive or pass on computer viruses.
- 5.3 If you would like to know more about our policies in relation to the use of cookies and your online security, please refer to our Privacy & Cookie Policy, available at [www.credit-suisse.com](http://www.credit-suisse.com).

## 6. Direct Marketing

- 6.1 From time to time, we may use your personal data (including your name and contact details, online behavioural information, and account, transaction and financial information) to send you news, offers, promotions and joint marketing offers about our Products and Services; but we cannot do so without obtaining your express consent in accordance with applicable Data Protection Laws.
- 6.2 We note that unless you have previously indicated that you do not wish to receive marketing materials from us, your consent to use and disclose your personal data for the above direct marketing purposes has been obtained in accordance with Data Protection Laws under existing privacy notices, agreements, and terms and conditions, as part of your ongoing relationship with us.
- 6.3 Even if you have previously given us your express consent to use and disclose your personal data for the above direct marketing purposes, you may withdraw your consent at any time free of charge by contacting us at the e-mail address specified at paragraph 12.3 below. The withdrawal of your consent will be processed and will take effect as soon as possible.

## 7. Adequate, Relevant and Non-Excessive Processing of Personal Data

We will only collect your personal data to the extent that it is required for the specific purpose(s) notified to you when we collect your personal data, or as permitted by applicable Data Protection Laws.

## 8. Accuracy of Your Personal Data

We will take all practicable steps to ensure that the personal data we hold is accurate and kept up-to-date. We will therefore take reasonable and appropriate steps to check the clarity and accuracy of any personal data at the point of collection and at regular intervals afterwards. Personal data which is found to be inaccurate or out of date will be amended or destroyed.

## 9. Retention of Your Personal Data

We will take all practicable steps to ensure that your personal data is not kept longer than is necessary for the purpose(s) that are notified to you when we collect your personal data (including any directly related purpose(s)) or as otherwise required to comply with applicable legal or regulatory requirements.

## 10. Data Confidentiality and Security

10.1 We shall take all practicable steps to maintain the security of your personal data from the point of collection to the point of destruction. We will therefore ensure that appropriate security measures are taken against any unlawful, unauthorised or accidental access, processing, erasure, loss or use of personal data. In order to maintain the security of your personal data, we have implemented the following procedures and measures:

- **Access controls.** Varying degrees of rights of access to systems containing personal data are granted to specific staff according to their roles and responsibilities. These rights of access are reviewed regularly. Third party service providers can only gain access on a need-to-know basis.
- **Physical, Electronic and Procedural Safeguards.** We maintain physical, electronic and procedural safeguards to guard your personal data, including firewalls, individual passwords, and encryption and authentication technology.

## 11. Transfer of Your Personal Data

11.1 From time to time, we may provide your personal data collected via this App to third parties who process personal data on our behalf ("**Data Processors**") (who may be within or outside of the jurisdiction in which you have a client relationship with us) to the extent necessary to achieve the purposes specified above and to the extent permissible by law. We will only transfer personal data to such third party Data Processors if they agree, contractually or otherwise, to comply with the procedures and policies in relation to the retention and security of personal data as outlined in paragraphs 9 and 10 above, or if they put in place adequate and appropriate retention and security measures themselves.

11.2 Typically, we provide personal data to the following persons for the purposes described in paragraph 4 above:

- the head office and any branches, representative offices, subsidiaries or associated or affiliated companies of the Credit Suisse Group AG, wherever located;
- any person to whom disclosure of your personal data is necessary in order for us to validly effect, manage, administer and/or enforce any services or transactions requested or authorised by you;
- any agent, contractor or third party service provider who provides administrative, telecommunications, information technology, payment, securities clearing, data processing or storage, video streaming or other content provision, market data or other services to us in connection with the operation of our business;
- any person to whom we are under an obligation to make disclosure under the requirements of any law, rules, regulations, codes of practice, guidelines or voluntary arrangements applicable to us or in response to properly made requests from law enforcement authorities or governmental agencies; and
- any of our auditors, legal and/or other professional advisors or any other person under a duty of confidentiality to us.

11.3 Further information about the persons to whom we may transfer your personal data may be contained in privacy notifications provided to you on or before collection of your personal data, our agreements with you, or terms and conditions which govern our relationship with you.

11.4 We will not transfer your personal data outside of the jurisdiction in which you have a client relationship with us unless:

- we reasonably believe that the receiving jurisdiction has in force any law which will ensure the adequate protection of your personal data;
- we have taken all reasonable precautions and exercised all due diligence to ensure the adequate protection of your personal data in the receiving jurisdiction;
- or
- where permitted by applicable Data Protection Laws, we have obtained your consent in writing .

## 12. Your Rights

12.1 You have certain rights in respect of your personal data under applicable Data Protection Laws, which may include the right to:

- ask us not to process your personal data for marketing purposes;
- check whether we hold personal data relating to you and to access such personal data; and
- ask us to correct personal data relating to you which is inaccurate.

12.2 Under certain Data Protection Laws, we have the right to charge a reasonable fee for processing any data access and/or correction requests.

12.3 Requests for the access and/or correction of personal data held by us may be made in writing to the Personal Data Protection Officer at [dataprotectionofficer.pb@credit-suisse.com](mailto:dataprotectionofficer.pb@credit-suisse.com) (for Hong Kong) or [PDPO.SGD@credit-suisse.com](mailto:PDPO.SGD@credit-suisse.com) (for Singapore).

Nothing in this Privacy Policy shall limit your rights under applicable Data Protection Laws.

This Privacy Policy shall be deemed an integral part of all contracts, agreements, credit facility letters, account mandates and other binding arrangements which we may enter into with you.

We may amend this Privacy Policy from time to time by posting an updated version on this App.