

Privacy statement



The following privacy statement will give you an overview of the collection and processing of your data

With the following information, we would like to provide you with an overview of our processing of your personal data and your rights under data protection legislation. Which data is individually processed and how it is used largely depends on the services requested or agreed upon.

1. Who is responsible for data processing and who can I contact?

The following unit is responsible and you can reach our Data Protection Officer at:

CREDIT SUISSE AG/CREDIT SUISSE (SWITZERLAND) LTD.
Data Protection Office Switzerland,
8070 Zurich ZH
Switzerland
Email: switzerland.data-protection@credit-suisse.com

2. What sources and data do we use?

We process personal data that we obtain from our clients as part of our business relationship. In order to provide our services, we also process personal data that we obtain from publicly accessible sources (e.g. debt registers, land records, commercial and association registers, the press, internet) or that is legitimately transferred to us by other companies within CREDIT SUISSE¹ or from other third parties (e.g. a credit agency).

Relevant personal data includes personal information (name, address and other contact data, date and place of birth, and nationality), identification data (e.g. ID data), and authentication data (e.g. specimen signature). Furthermore, this can also include order data (e.g. payment order), data from the fulfillment of our contractual obligations (e.g. sales data in payment transactions), information about your financial situation (e.g. creditworthiness data, scoring/rating data, origin of assets), marketing and sales data (including advertising scores), documentation data (e.g. consultation protocol), and other data similar to the categories mentioned.

3. Why do we process your personal data (purpose of processing) and on what legal basis?

We process personal data in accordance with the provisions of the Swiss Federal Act on Data Protection (FADP):

a. For the fulfillment of contractual obligations

Data is processed to provide banking business and financial services as part of the execution of our contracts with our clients or for the execution of pre-contractual measures.

The purposes of data processing are based first and foremost on the specific product (e.g. account, credit, saving with building societies, securities, deposits, client referral) and may include, among other things, needs analyses, advice, asset management and support, as well as the execution of transactions. You can find further details on the data processing purposes in the relevant contract documents and terms and conditions.

¹ This includes Credit Suisse companies in Switzerland and abroad.

b. In the context of balancing interests

If necessary, we will process your data beyond the actual fulfillment of the contract to preserve our legitimate interests or those of a third party. Examples:

- Consultation and data exchange with data collection agencies (e.g. debt register) to investigate creditworthiness and credit risks in the credit business and the need for a basic account or account maintained with a basic non-seizable balance;
- Review and optimization of procedures for needs analysis for the purpose of direct client contact;
- Advertising or market and opinion research, provided you have not objected to the use of your data;
- Assertion of legal claims and defense in case of legal disputes;
- Safeguarding of IT security and the IT operation of the bank;
- Prevention and investigation of criminal activity;
- Video surveillance to protect the right of owner of premises to keep out trespassers, for collecting evidence in hold-ups or fraud, or to prove availability and deposits e.g. at ATMs;
- Measures for building and system security (e.g. access controls);
- Measures for business management and further development of services and products;
- Risk control at CREDIT SUISSE.

In addition, we obtain personal data from publicly available sources for client acquisition purposes.

c. As a result of your consent

If you have given us consent for the processing of personal data for specific purposes (e.g. analysis of transaction data for marketing purposes), the legality of this processing is based on your consent. The consent given can be revoked at any time. The revocation of consent will not affect the legality of the data processed until the revocation.

Due to statutory provisions or in the public interest

Furthermore, as a bank, we are subject to various legal obligations, meaning statutory requirements (e.g. the Swiss Banking Act, Collective Investment Schemes Act, Anti-Money Laundering Act, Mortgage Bond Act, FINMA ordinances and circulars, tax laws) and bank regulatory requirements (e.g. Swiss National Bank, FINMA). Purposes of processing include the assessment of creditworthiness, identity and age checks, fraud and money laundering prevention, fulfilling control and reporting obligations, and measuring and managing risks within CREDIT SUISSE.

4.

Who receives my data?

Within the bank, access to your data is given to the units that need it in order to fulfill our contractual and legal obligations. Service providers and vicarious agents employed by us may also receive data for these purposes, provided they maintain bank client confidentiality. These are companies in the categories of banking services, IT services, logistics, printing services, telecommunications, collections, advisory services and consulting, as well as sales and marketing.

With regard to data communication to recipients outside our bank, it should first be noted that we as a bank have a confidentiality obligation regarding all client-related facts and valuations that we gain knowledge of (banking confidentiality pursuant to our general terms and conditions). We can only communicate information about you if legal provisions demand this, if you have consented to this (e.g. to execute a financial transaction based on your instructions to us), or if we are authorized to issue bank information. Under these conditions, recipients of personal data may be, for instance:

- Public entities and institutions (e.g. Swiss National Bank, financial authorities, criminal prosecution authorities) upon providing a legal or official obligation;
- Other credit institutions and financial services institutions, or similar entities to which we communicate personal data in order to carry out a business relationship with you

(depending on the contract, for instance, correspondent banks, custodian banks, brokers, stock exchanges, data collection agencies);

- Other companies within CREDIT SUISSE for risk control due to a legal or regulatory obligation.

Other data recipients may be the entities for which you have given us permission to share data with or for which you have released us from bank client confidentiality in accordance with a declaration or consent.

5. Will data be transferred to a third country or an international organization?

a. Data transfer to states outside Switzerland that do not have a comparable level of data protection (known as third countries) takes place so long as:

- It is necessary for executing your orders (e.g. payment or securities orders);
- It is required by law (e.g. tax reporting obligations); or
- You have given us consent.

b. Please contact us if you would like to see a copy of the specific safeguards applied to the transfer of your information.

6. For how long will my data be stored?

We only process and store your personal data for as long as is necessary for the fulfillment of our contractual and legal obligations. In this context, it should be noted that our business relationship is a continuing obligation that spans years.

If the data is no longer required for the fulfillment of contractual or legal obligations, it is regularly deleted unless limited continued processing is necessary for the following purposes:

- Fulfillment of obligations to preserve records according to commercial and tax law. This includes, in particular, the Swiss Code of Obligations, the Federal Act on Value-Added Tax, the Direct Federal Taxation Act, the Federal Act on the Harmonization of Direct Cantonal Taxation and Direct Community Taxation, the Federal Stamp Tax Act, and the Federal Withholding Tax Act;
- As a bank, we may also face legal holds² that require us to keep records for an undefined period of time.

7. What data protection rights do I have?

Every affected individual has the right to **information** according to Article 8 FADP, the right to **correction** according to Article 5 FADP, the right to **erasure** according to Article 5 FADP, the right to **restrict processing** according to Articles 12, 13, 15 FADP, the right of objection according to Article 4 FADP, and – if applicable – the right to **data portability**. Furthermore, if applicable to you, there is also a **right to lodge a complaint** with an appropriate data privacy regulatory authority.

You can withdraw consent given to us for the processing of personal data at any time. Please note that the revocation will be effective for the future. Processing carried out prior to the revocation will not be affected.

² A legal hold is a process that an organization uses to preserve all forms of relevant information when litigation is reasonably anticipated.

8. Am I obliged to provide data?

As part of our business relationship, you must provide the personal data necessary for the initiation and execution of a business relationship, as well as for the fulfillment of the associated contractual obligations, or that we are legally obliged to collect. Without this data, we will generally not be in a position to enter into or execute a contract with you.

In particular, we are obligated under anti-money laundering regulations to identify you prior to establishing a business relationship on the basis of your identity document and, in doing so, to collect and record your name, address, nationality, date of birth, place of birth, and ID information. To enable us to meet these statutory obligations, you must provide us with the necessary information and documents in accordance with the Anti-Money Laundering Act, and you must also immediately notify us of any changes over the course of the business relationship. If you do not provide us with the necessary information and documents, we are not allowed to enter into or continue the business relationship you desire.

9. To what extent does automated decision-making take place?

To establish and execute a business relationship, we fundamentally do not use any fully automated decision-making. If we use this process in individual cases, we will inform you of this separately, provided this is legally required.

10. Will profiling take place?

We process some of your data automatically (profiling). We use profiling in certain instances, for example:

- Due to legal or regulatory requirements, we are obligated to prevent money laundering, terrorist financing and asset-threatening criminal offenses. In doing so, data analyses (including in payment transactions) are carried out. These measures also serve to protect you;
- We use assessment tools in order to be able to specifically notify and advise you regarding products. These allow communications and marketing to be tailored as needed – including market and opinion research;
- We use scoring as part of the assessment of your creditworthiness. In doing so, the probability that a client will meet their payment obligations pursuant to the contract is calculated. This calculation may be influenced by the client's earning capacity, expenses, pending liabilities, occupation, employer, term of employment, experience from the business relationship thus far, contractual repayment of previous credits, and information from credit information offices, for instance. Scoring is based on a mathematically and statistically recognized and established process. The calculated scores help us to make decisions in the context of product sales and are incorporated into ongoing risk management.

11. We may collect biometric data from you

Biometric data is classified as sensitive personal data. Therefore, where required by applicable law, your explicit consent will be required in a separate process to use your fingerprint or other biometric identification system to access certain applications.

Thank you for your attention.

Yours sincerely

CREDIT SUISSE AG/CREDIT SUISSE (SWITZERLAND) LTD.

Information on your right of objection

1. **Right of objection against data processing for the purposes of direct advertising**

In individual cases, we will process your personal data to carry out direct advertising. You have the right to object at any time to the processing of your personal data for the purposes of such advertising.

If you object to processing for direct marketing purposes, we will no longer process your personal data for such purposes.

2. **Case-related right of objection**

On grounds relating to your particular situation, you shall have the right to object, at any time, to the processing of your personal data, which is based on the public interest or on balancing interests. This also applies to profiling based on these provisions.

If you submit an objection, we will no longer process your personal data unless we can give evidence of legitimate reasons for processing which outweigh your interests, rights, and freedoms, or processing serves to enforce, exercise, or defend legal claims. Please note, that in such cases we will not be able to provide services and maintain a business relationship.

The objection is not subject to any condition of form, and should be addressed whenever possible to

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Data Protection Office Switzerland, 8070 Zurich ZH
Switzerland
Email: switzerland.data-protection@credit-suisse.com

Information for residents of California

Further information can be found online in our otherwise applicable data protection notices (including our California Consumer Privacy Act Annual Notice Supplement for clients of Credit Suisse domiciled in California, effective from January 1, 2020, at <https://www.credit-suisse.com/us/en/legal/privacy-statement.html>).

For all other questions, please contact us.data-protection@credit-suisse.com.