

Client Rights under The Data Protection (Bailiwick of Guernsey) Law 2017 (GDPL*)

Credit Suisse is firmly committed to protecting and enhancing the rights afforded to clients by the new Guernsey Data Protection Law (“GDPL”). The introduction of GDPL strengthens our commitment and obligations to responsibly obtain, process and protect your data.

GDPL was introduced to provide a modern and comprehensive framework regarding data protection across the Bailiwick of Guernsey. The Law establishes a set of principles, implementation requirements and rights for individuals that apply to any Guernsey operating organisation that collects and processes personal data. Credit Suisse has undertaken extensive preparation for the introduction of the Law on the 25th May 2018 and we are informing all our clients of the key aspects of GDPL and its impacts in relation to our obligations to you, your rights and your data.

Our GDPL Commitments & Obligations

Under GDPL and with respect to your personal data, Credit Suisse is designated as both a Data Processor¹ and Data Controller². This places specific obligations on us to ensure that any Personal Data e.g. personally identifiable information and any Sensitive Personal Information e.g. political affiliation is always processed fairly, lawfully and in a transparent manner in relation to you.

Personal Data We Capture

We collect personal data in order to conduct contractual business and compliance activities with you in accordance with the law. We limit the type and amount of data captured to obtain only what is required to accurately complete and process the business activities carried out on your behalf.

To fulfil any contractual obligation with regard to the services we provide to you, we may share your personal data across the Credit Suisse Group and to authorised, third parties in different geographic locations.

Our GDPL Commitments

Our continued commitment to operate responsibly with your personal data under GDPL specifically reaffirms that:

- We will ensure robust security controls and processes are in place to protect your data against unauthorised access, processing, loss or accidental destruction
- We will process your data in a manner that is consistent with the original purposes for its collection
- We will maintain the accuracy of any personal data captured and ensure our processes can rectify inaccurate data without undue delay
- We will establish robust governance, operational procedures and staff training to maintain compliance with all data protection legislation.

Your Rights Under GDPL

GDPL provides clients with enhanced rights to access the data that we hold on you and greater control on how your personal data is used. As an individual whose personal data we process, you are specifically provided with and can exercise the following rights:

- To be informed about what data we hold on you
- To access the data that we hold on you
- To rectify any inaccurate data that we hold on you
- To have any data that we hold on you to be erased³
- To restrict us processing data held on you⁴
- To move your data to another organisation - data portability
- To object to your data being collected or used
- To opt out of automated decision making and profiling

*The Data Protection (Bailiwick of Guernsey) Law, 2017 is equivalent to the EU General Data Protection Regulation

1. Data Processor - Processes personal data on behalf of a controller

2. Data Controller - Determines the purposes and means of controlling data

3. Subject to legal, contractual and service provision restrictions that would prevent the erasure of data

4. Excludes restrictions that are incompatible with the provision of a service

The Data Protection Officer Role

In accordance with GDPR, the Group have appointed a Data Protection Officer (DPO) and established a new Data Protection function. They will work in conjunction to monitor our regulatory and legal compliance with any data protection and data privacy legislation that is introduced.

The DPO will act as an advisor and subject matter expert on personal data issues both internally across the Credit Suisse Group and externally for all clients. The DPO will also be the primary authority and point of contact for all clients whose data we process and any legal authorities that we are obliged to interact with.

Next Steps

We will update our Terms of Business to incorporate the changes introduced by GDPR.

We have also updated our privacy notices to reflect our new level of compliance with data protection legislation. Please visit the URL below to access the privacy notice:

<https://www.credit-suisse.com/gg/en/legal/privacy-and-cookie-policy.html>

Further Information

For more information on GDPR and what this means for you, please contact your Relationship Manager or us directly at:

Credit Suisse AG
Helvetia Court,
Les Echelons,
Guernsey GY1 3YJ

Email: Dataprotection.guernsey@credit-suisse.com
Specific data protection and GDPR regulatory information can also be obtained from the regulatory authorities stated below:

- The Office of the Data Protection Commissioner - <https://dataci.gg>
- Guernsey Financial Services Commission - www.gfsc.gg