



Data protection
information

With the following Information Notice we would like to provide you with an overview of how we process your data and your rights under data protection legislation.

The personal data actually processed and used in the individual case depends considerably on the services requested or agreed upon.

Purpose of data processing and legal basis

The Bank processes personal data in accordance with the applicable data protection legislation. The main objectives pursued are explained below:

a. Fulfilment of contractual obligations

The purpose of the processing of personal data is the provision of banking and financial services as part of the execution of contracts with our customers or for the implementation of pre-contractual measures that take place on request. The purpose of the respective processing of personal data is primarily based on the contract and/or the specific banking product (e.g. account management, lending, securities / custody account transactions, etc.) and may also relate to execution and support activities in the field of banking advice, asset management and support, needs analysis and transaction execution. Further information and specific details on the purpose of processing your personal data can also be found in the respective contractual documentation as well as in our General Terms and Conditions.

b. Processing on the basis of consent

If you have given your consent to the processing of your personal data for a certain purpose (e.g. analysis of certain data for marketing purposes), this consent constitutes the legal basis for the data processing. You may revoke your consent given to us at any time. Please note that the revocation has no retroactive effect. It does not affect data processing operations that took place before the revocation.

c. Protection of legitimate interests

The processing of personal data beyond the performance of the specific contract only takes place if such processing serves to protect the legitimate interests of the Bank or of third parties. This hypothesis may, for example, occur in the following cases:

- advertising operations or market analysis and opinion polls, provided that there is no opposition to the use of the data;
- measures for the optimization of services and products as well as business management;

- measures for the establishment and exercise of legal claims and for the defence in case of legal disputes;
- measures to safeguard our IT security and operations;
- measures for the prevention and detection of criminal offences and measures for the collection of evidence (e.g. in the case of robberies and cases of fraud);
- measures to protect property (e.g. video surveillance).

d. Fulfilment of legislative requirements or for reasons of public interest

In addition, the processing of personal data may also be necessary due to legal requirements or for reasons of public interest. The Bank is subject to various legal requirements, including statutory obligations (e.g. Federal Banking Act, Anti-Money Laundering Act, Cartel Act, Criminal Code, Collective Investment Schemes Act, Mortgage Bond Act, as well as FINMA ordinances and circulars and tax laws) and banking supervision regulations issued by FINMA and the Swiss National Bank).

Data used

We process personal data that we obtain as part of our existing business relationship with you. To the extent that this is necessary for the provision of our services, we will also process personal data that we obtain from publicly accessible sources (e.g. debtors' registers, land registers, commercial registers, etc.) or that are legitimately transmitted to us by third parties (e.g. credit information centers, pension funds, authorities, etc.).

The personal data processed in this case are in particular personal details (name, address and other contact details, date and place of birth as well as nationality), identification data (e.g. document data, identity data) and any other authentication data (e.g. specimen signatures).

The data processed can also be mandate data (e.g. payment orders), data for the fulfilment of our contractual obligations (e.g. payment transaction data), information on your financial situation (e.g. information on creditworthiness,

origin of assets, etc.), advertising and distribution data, documentation data (e.g. minutes of the consultation) and other data similar to the categories mentioned.

Access to personal data

Within the Bank, the units that will have access to personal data will be those that need it to fulfill our contractual and legislative obligations.

Service providers and auxiliary staff employed by us may also obtain personal data for the above purposes, provided that banking secrecy is maintained. In this context, service providers and support staff are understood to be companies in the areas of banking, IT services, logistics, printing, telecommunications, debt collection, consulting and advisory services as well as sales and marketing.

In connection with the transfer of personal data to recipients outside of our Bank, we always ensure that banking secrecy is observed. In view of this, personal data will therefore only be passed on if required to do so by legal regulations, if the person concerned has given his or her consent to the transmission or if the Bank is authorized to release the information. Public offices or institutions are therefore also recipients of personal data if they are required to do so by law or authorities (e.g. Swiss National Bank, FINMA, tax authorities, law enforcement agencies). The transmission of personal data may also occur to other credit and financial services institutions or similar organizations with regard to personal data transmitted for the purposes of implementing a business relationship (e.g. correspondent banks, custodian banks, brokers, stock exchanges, etc.). Recipients of personal data are also those institutions to which the respective client has given consent to the transfer of data and/or released the Bank from banking secrecy.

Transmission of data abroad or to an international organization

The transmission of personal data to entities or states outside Switzerland takes place in the following ways:

- provided that this is necessary for the execution of orders (e.g. payment and/or securities orders);
- on condition that this is required by law (e.g. as part of the reporting obligations under tax law, the automatic exchange of information, etc.);
- provided that consent has been given for this purpose.

Archiving of personal data

The Bank processes and stores personal data as long as and to the extent that this is necessary for the fulfilment of its contractual and legislative obligations.

Personal data that are no longer required for the fulfilment of contractual or legislative obligations shall be routinely deleted, unless the further processing of personal data is required for a contractual or legislative purpose.

This includes the observance and fulfilment of storage obligations under commercial and tax law, in particular those arising from the Swiss Code of Obligations (CO), the Federal Law on Value Added Tax or the Federal Law on Direct Federal Taxation. This may also include data archiving for the purpose of obtaining evidence within the framework of the legal provisions on limitation periods (e.g. pursuant to Art. 127 ff. of the Swiss Code of Obligations).

Within the framework of this information on the storage of personal data, we would like to draw your attention to the fact that our business relationship is normally a long-term, obligatory relationship.

Data security

The Bank has taken appropriate technical and organizational measures to protect your personal data against loss, misuse, unauthorized access, transmission and modification. Our security measures include, for example, firewalls, data encryption, physical and technical access restrictions as well as regular security measures (backups).

Rights of the data subject

Every data subject has the right of access, the right to rectification, the right to erasure, the right to restriction of processing, the right to object, and - where applicable - the right to data portability. There is also a right to lodge a complaint with a competent data protection supervisory authority.

You may revoke your consent to the processing of your personal data at any time. Please note that the revocation has no retroactive effect.

Obligation to provide data

Within the scope of our business relationship, you are obliged to provide all personal data required for the acceptance and execution of a business relationship and the fulfilment of the associated contractual obligations, as well as data that the Bank is required to collect by law. Without such data, Axion SWISS Bank is in principle unable to enter into or perform a contract with you.

In particular, money laundering prevention legislation requires us to identify you on the basis of your identity documents before establishing a business relationship and to collect and record your name, place and date of birth, nationality, address and identification data for this purpose. To enable you to comply with these legal obligations, you are also required to immediately notify us of any changes that occur during the course of the business relationship. If you choose not to provide the necessary information and documents, we will not be able to enter into or continue the business relationship you have requested.

Automated decision-making and profiling

For the purposes of establishing or carrying out the business relationship, the Bank does not use any fully automated decision-making processes with legal effect.

The Bank does process personal data in part by automated means in order to analyze certain personal aspects (profiling). Such processing is, for example, used in the manner described below:

- Data processing within the scope of legal and regulatory provisions for combating money laundering, terrorist financing or crimes that put assets at risk. In this context, data analyses are also carried out (including in payment transactions). These measures also serve to protect our customers;
- We use analytical tools for targeted information and advice on our products. These tools enable needs-oriented communication, advertising as well as market and opinion research;
- As part of the credit check, creditworthiness is assessed and sustainability is measured.

Data protection officer

Our Bank's Data Protection Officer can be contacted at the following contact details:

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