

## Data protection information for clients and third parties

We take the protection of your data seriously and would like to inform you about our data processing in accordance with the Data Protection Act as follows:

- a) The processing purposes and their legal basis
- b) The type of personal data categories, the origin of the data, the storage period and any transfer of personal data abroad
- c) The legal basis for data forwarding
- d) Information about automated individual decision-making
- e) Your rights

### a) The processing purposes and their legal basis

Processing purpose	Legal basis
Correspondence	Art. 6 Para. 1 Letter f, GDPR
PEP profile	Art. 6 Para. 1 Letter c, GDPR
Master data administration for legal entities	Art. 6 Para. 1 Letter c, GDPR
Master data administration for natural persons	Art. 6 Para. 1 Letter c, GDPR
Central document management for mandates/business documents	Art. 6 Para. 1 Letter c, GDPR

### b) Description of data categories and their processing

Correspondence				
Data category	Description	Storage period	Origin	Transfer abroad
Mandate-related e-mail correspondence	Instructions, identification documents, clarifications, appointments, information letters, order forwarding, invitation to meetings	After transfer to the document management system	Directly collected	No
e-mail correspondence	Enquiries, orders, clarifications, invitations	2 years after receipt	Directly collected	No

PEP profile				
Data category	Description	Storage period	Origin	Transfer abroad
Client data	Last name, first name, date of birth, occupation	10 years after termination of the contract	World Check, LexisNexis	No

Risk assessment data	PEP connections, PEP function, mandates involved together with asset details	10 years after termination of the contract	World Check, LexisNexis	No
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### Master data administration for legal entities

Data category	Description	Storage duration	Origin	Transfer Abroad
Bank information	Bank, IBAN, BIC	10 years after termination of the contract	Directly collected	On behalf of the client to fulfil the contract (Art. 49 Para. 2 Letter c)
Detailed information about companies	Legal form, foundation data, commercial register extract, commercial register number, governing bodies, capital, homepage	10 years after termination of the contract	Directly collected	On behalf of the client to fulfil the contract (Art. 49 Para. 2 Letter c)
Mandate allocation	Functional role vis-à-vis affected companies	Depending on mandate allocation	Directly collected	On behalf of the client to fulfil the contract (Art. 49 Para. 2 Letter c)

### Master data administration for natural persons

Data category	Description	Storage period	Origin	Transfer abroad
Personal contact data	First name, last name, address, tel. no., e-mail, mandate allocation	10 years after termination of the contract	Directly collected	On behalf of the client to fulfil the contract (Art. 49 Para. 2 Letter c)
Detailed information about persons	Date of birth, gender, ID/driving licence/passport, utility bill, relationship status, nationality, tax no., tax domicile, occupation, place of residence, self-disclosure, FATCA documents	10 years after termination of the contract	Directly collected	On behalf of the client to fulfil the contract (Art. 49 Para. 2 Letter c)
Bank information	Bank, IBAN, BIC	10 years after termination of the contract	Directly collected	On behalf of the client to fulfil the contract (Art. 49 Para. 2 Letter c)
Data report register of beneficiaries	First name, last name, date of birth, country of domicile, nationality	10 years after termination of the contract	Directly collected	No

Mandate allocation	Functional role vis-à-vis affected companies	Depending on mandate allocation	Directly collected	On behalf of the client to fulfil the contract (Art. 49 Para. 2 Letter c)
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Central document management for mandates/business documents				
Data category	Description	Storage duration	Origin	Transfer Abroad
Mandate data	Accounting, bank documents, bank records, contracts and agreements, due diligence documents, minutes of meetings, correspondence, invoices and reminders, powers of attorney	10 years after termination of the contract	Directly collected, third-party providers, compliance portals	No

c) Legal basis for data forwarding

Data category	Recipient	Legal basis	Purpose
Bank information	Financial supervision authorities	Art. 6 Para. 1 Letter c, GDPR	Due diligence checks or requests for information by financial supervisory authorities, suspicious activity report by the Jeeves Group
Bank information	Financial supervision authorities	Art. 6 Para. 1 Letter c, GDPR	Suspicious case, inspection of files by financial supervisory authorities
Data report Register of Beneficial Owners	Register of Beneficial Owners	Art. 6 Para. 1 Letter c, GDPR	Data report Register of Beneficial Owners
Detailed information about companies	Financial institutions	Art. 6 Para. 1 Letter b, GDPR	Maintaining the bank account
Detailed information about companies	Financial supervision authorities	Art. 6 Para. 1 Letter c, GDPR	Suspicious case, inspection of files by financial supervisory authorities
Detailed information about persons	Financial institutions	Art. 6 Para. 1 Letter b, GDPR	Maintaining the bank account
Detailed information about persons	Financial supervision authorities	Art. 6 Para. 1 Letter c, GDPR	Due diligence checks or requests for information by financial supervisory authorities, suspicious activity report by the Jeeves Group
Personal contact data	Fiscal Authority	Art. 6 Para. 1 Letter c, GDPR	AEOI report, FATCA
Personal contact data	Financial institutions	Art. 6 Para. 1 Letter b, GDPR	Maintaining the bank account

Personal contact data	Financial supervision authorities	Art. 6 Para. 1 Letter c, GDPR	Due diligence checks or requests for information by financial supervisory authorities, suspicious activity report by the Jeeves Group
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d) Information about automated individual decision-making

We shall not make any decisions on the basis of your personal data that are based exclusively on the automated processing of your data and that are associated with a legal repercussion for you or that have a significantly detrimental effect on you.

e) Your rights

You are essentially entitled to the right of access, rectification, erasure, restriction, data portability, revocation as well as the right to object. If you believe that the processing of your data is in breach of data protection law or that your rights under data protection law have been violated in any other way, you may turn to the competent data protection authority.

Note:

If you provide us with data of third parties, we shall assume that they have been informed about this by you.