

## Privacy policy / Data Protection Declaration

Thank you for your interest in our company. Data protection is very important to us and accordingly we explain in this data protection declaration how we collect and process which personal data (in short: "personal data", i.e. data relating to a specific or identifiable person, such as name, address, nationality, e-mail address, etc.).

This privacy policy is based on the CH Data Protection Act (in short: "DSG").

### 1 Responsible party, data protection officer and representative

- (1) Finaco Treuhand AG shall be responsible for data protection.
- (2) The contact details of the data protection officer are as follows:  
Email: [info@finaco.ch](mailto:info@finaco.ch)  
Telephone: +41 43 311 75 11

### 2 Collection of personal data and purposes of processing

- (1) We restrict the processing of personal data primarily to personal data which we receive in connection with our services and products from our customers, our cooperation partners or other persons involved or which we collect from users on our websites, apps or other applications.
- (2) In particular, we collect the following personal data from you on a case-specific basis and depending on the purpose (see below):
  - Salutation / title
  - First name, last name
  - Your address
  - email address
  - Telephone number(s)
  - Date of Birth
  - Nationality(ies)
  - Family circumstances
  - Tax identification number / AHV number
  - Bank data
- (3) In addition, we obtain and process, if permitted and indicated, further data from publicly accessible sources (e.g. land register, commercial register, media, Internet, etc.) or receive such data from authorities and institutions, from your personal environment such as family, legal advisors or from other third parties.

- (4) We require this data in particular for the following purposes:
- for your identification as a customer or cooperation partner
  - for correspondence with you
  - to carry out our due diligence obligations
  - to comply with other legal requirements
  - for the conclusion and processing of service contracts, e.g. foundation order, mandate contract, order confirmations
  - for the conclusion and processing of purchase and sales contracts
  - for invoicing
  - for the provision of further services from our company or, if necessary, in cooperation with third parties
  - to provide you with the best possible and tailor-made services and to further develop our range of services and products
  - to communicate with third parties
  - to assert legal claims or defend our position in general
  - to safeguard our operations in general (e.g. IT, websites, apps)
  - to safeguard further security aspects
- (5) We process your personal data only if we have a legal or contractual basis or if the data processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority. We only process data beyond this if we have consent from you and there is no revocation. Consent can be revoked at any time.

### **3 Recipients of personal data and data transfer abroad**

- (1) We will only pass on your personal data to recipients or third parties for the purposes described above, insofar as this is permitted and appropriate. These may include in particular:
- Service companies such as banks, asset management companies, insurance companies, IT providers, suppliers, dealers
  - suppliers, dealers, transport companies, subcontractors or other cooperation partners
  - Authorities, state institutions, courts
  - associations, institutions of public interest
- (2) Such data transfer is based either on a legal obligation (e.g. data transfer in the course of the automatic exchange of information), a contract performance (e.g. asset manager abroad), a consent on your part, a public interest or on the basis of a legitimate interest on our part, unless the interests or fundamental rights and freedoms of you with regard to the protection of personal data prevail.
- (3) The recipients may be in Germany or abroad. In particular, we draw your attention to the fact that we transfer personal data to countries in which service companies from which we procure services are located.

In the case of recipients outside our company in the EU/EEA or in countries with recognized data protection adequacy, we ensure data protection by concluding so-called commissioned data processing agreements where necessary and appropriate.

If we transfer personal data to third countries without adequate legal data protection, we ensure an adequate level of protection in accordance with legal requirements, for example on the basis of CH standard contractual clauses or other instruments (e.g. Binding Corporate Rules, US Privacy Shield).

## **4 Data protection during applications and the application process**

We collect and process personal data from applicants for the purpose of handling the application process. The processing can take place on paper or also by electronic means via email or by filling out a web form. If an employment contract is concluded with an applicant, the personal data received will be processed for the purpose of handling the employment relationship in compliance with the statutory provisions. Otherwise, the application documents will be deleted three months after rejection, provided that no legitimate interests on our part, for example in connection with a duty of proof in the sense of equal treatment, oppose deletion. If you have given your consent, we may also store application documents for a longer period of time in order to take them into account for a possible subsequent vacancy.

## **5 Storage period**

As a matter of principle, we store your personal data only for as long as is necessary for the purposes for which they were collected in accordance with this privacy policy. However, it may happen that we are legally obliged to store certain data for a longer period of time. In this case, we will ensure that your personal data is treated in accordance with this privacy policy for the entire period.

## **6 Your rights**

- (1) You have the right to request information from us at any time and free of charge about the personal data we have stored about you, as well as about its origin, recipients or categories of recipients to whom this personal data is disclosed and the purpose for which it is stored.
- (2) You also have the right to demand that we correct, delete or restrict the processing of your personal data at any time. In addition, you have the right to data portability.
- (3) You also have the right to object to the processing of your personal data by us at any time.
- (4) If you have given us consent to use personal data, you may revoke this consent at any time without giving reasons.
- (5) If you wish to assert the above rights, please contact us at the address given in paragraph 1.

## **7 Data security**

We maintain up-to-date technical measures to ensure data security, in particular to protect your personal data from risks during data transfers and from third parties gaining knowledge. These are adapted to the current state of the art.

## **8 Modification**

Our service offerings are subject to ongoing technical development. In this and the legal framework, we will also continuously adapt our data protection statement. For this purpose, changes to the data protection declaration will be published on our website. Therefore, please read the current version of this data protection declaration regularly. Subject to the applicable legal provisions, all changes to the data protection declaration will come into force as soon as the updated data protection declaration is published.

Zurich, Januar 2022