

General Privacy Statement of Swisscard AECS GmbH

August 2023

1. What is this Privacy Statement about?

Swisscard AECS GmbH, Neugasse 18, 8810 Horgen ("Swisscard" or "we") processes data relating to you or other persons in various ways and for various purposes. This Privacy Statement explains how we process such data (hereinafter "data" or "personal data") in the course of our routine business activities. **You can find more information about our data processing, according to your role or function with us**, in the following privacy statements on our website (www.swisscard.ch/dataprotection):

- Privacy Statement for Private Customers
- Privacy Statement for Business Customers
- Online Privacy Statement (for the use of our websites and apps)
- Privacy Statement for Merchants (for American Express acceptance partners of Swisscard)

Other documents, such as Swisscard's General Terms & Conditions, also indicate that we process personal data and explain how we do so.

2. Who is responsible for processing your data?

Swisscard is the data controller - i.e. the entity responsible for data protection under data protection law - responsible for data processing under this Privacy Statement. If you wish to contact us in this regard, please write to the following address:

Swisscard AECS GmbH
Data Protection Office
Neugasse 18
P.O. Box
8810 Horgen
E-Mail: datenschutz@swisscard.ch

3. Which personal data do we process, and to what purposes?

We particularly process data for the following purposes, and other compatible purposes:

- **Agreements:** When we enter into agreements with you or the organization you work for we process the data necessary for formation, management, processing and enforcement, particularly basic data concerning our contact persons and other persons of the relevant organisation, details of the agreements and information arising from

the management and enforcement of the agreements, further data about communications and, where applicable, legal proceedings.

- **Communications:** whenever we communicate with you or an organization you work for we process the content of the communication and other communication-related data (e.g., cause and date), for the purpose of the communication and its documentation, as well as for purposes of training, quality control and enquiries. Telephone conversations with us may be recorded.
- **Visitors:** whenever you visit our premises, we process your contact data and information about the cause and time of the visit. We may also use surveillance cameras on our premises for security purposes.
- **IT-Security:** we also process data in order to ensure adequate IT security. Such processing includes, for example, analyses, tests, error checks and backup copies.
- **Prevention and Compliance:** We process data to prevent crimes and other violations and to comply with laws, policies and recommendations by authorities, as well as our in-house regulations.
- **Proceedings:** In the event that we participate in proceedings (e.g., a judicial or administrative proceeding), we process data e.g. concerning the parties to the proceedings and other participants, such as witnesses or informants and disclose data to such parties, courts and authorities, in some cases abroad.
- **Competition:** we process data about our competitors and the market environment in general (e.g. the political situation, the situation with professional associations, etc.). In doing so, we may also process data relating to key persons, especially their names, contact data, role or function, and public statements.
- **Other purposes:** to the extent necessary, we process data for other purposes such as training and education, management, enforcement and defence against claims, evaluation and improvement of internal workflows, generating anonymous statistics and analyses.

This data relates not only to you, but also, in some cases, to third parties (e.g. authorised agents, employers, colleagues, etc.). Whenever you transmit data about third parties to us, we assume that you are authorised to do and that such data is correct. Therefore, please inform these third parties about the processing of their data by us and notify them of this Privacy Statement.

4. Whom do we disclose your data to?

In connection with those purposes, we also disclose personal data to third parties, especially to the following:

- **Service providers:** we work together with domestic and foreign service providers (e.g. for IT services, consulting, security services, etc.) that may process your data.
- **Other third parties:** depending on the purpose of the data processing, other recipients may include the organisation you work for, courts, government agencies and parties to proceedings.

These recipients may be located outside of Switzerland. These third parties and their subprocessors may process data abroad, globally, including outside the EU and the European Economic Area (EEA). Many third countries currently do not have laws that ensure a level of data protection comparable to the level of protection under Swiss law. We therefore take contractual precautions to contractually compensate for the weaker statutory protection, unless disclosure is otherwise permitted by data protection law on a case-by-case basis. These precautions particularly include standard contractual clauses issued or recognised by the European Commission and the Swiss Data Protection and Information Commissioner (FDPIC). Additional information and a copy of these clauses can be found at <https://www.edoeb.admin.ch/edoeb/de/home/datenschutz/handel-undwirtschaft/uebermittlung-ins-ausland.html>.

Please also note that data exchanged over the Internet is often transmitted via third countries. Your data may therefore be transferred abroad even if the sender and recipient are located in the same country.

5. How long do we process your personal data?

We store and process your personal data as long as necessary for the processing purpose, so long as we have a legitimate interest in such storage and the data is subject to a statutory retention obligation. We will delete or anonymise your personal data at the end of the relevant retention period.

6. What are your rights?

Data protection law gives you specific rights related to your personal data:

- You have the right to request certain information about our processing of your personal data (right to information).
- You may also require us to correct or supplement inaccurate or incomplete data, to cease processing for specific purposes (e.g. by objecting to marketing or by revoking a specific consent, which will not affect the legality of the processing performed pursuant to the consent up to the time of revocation) or to delete data that requires no further processing for the fulfilment of legal obligations or the protection of overriding

interests. In the case of certain data, you also have the right to require us to make such data available in machine-readable format.

Please note that these rights are subject to statutory requirements and limitations and are therefore not available in their entirety in every case.

You are under no obligation to disclose data to us. However, we need to process certain data for legal or operational reasons.

If you wish to exercise your personal data rights against us, please contact us in writing (by post) (Section 2). In general, we will have to verify your identity (e.g. by means of a copy of your ID).

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