

## Privacy statement and data protection

### 1. Introduction

NPB Neue Privat Bank AG ("NPB") appreciates your interest in our products and services. Your privacy is important to us and we want you to feel comfortable using our products and services and visiting our website. The responsible and lawful handling of your personal data is an important concern for NPB. To this end, we take appropriate precautions (e.g. implementation of technical and organizational security measures such as password encryption and authentication technologies, access management, sensitization and training of employees, appointment of a data protection officer).

This Privacy Policy contains information about how NPB processes your personal information when you use NPB products and services, visit the NPB website, or register for a service and provide information about yourself. Before you register for or use NPB services, or before you provide any personal information, please read our Privacy Policy carefully. Any additional terms and conditions that apply to NPB Services will be communicated when you register for those services.

### 2. Questions and contact

If you have any questions regarding the processing of your personal data or would like to exercise your data subject rights, you are welcome to contact our data protection officer via the contact form on the NPB website ([info@npb-bank.ch](mailto:info@npb-bank.ch)).

Alternatively, you can send us a written request by mail to the following address:

NPB Neue Privat Bank AG  
Limmatquai 1 / Bellevue  
P.O.Box  
CH-8024 Zurich

### 3. Processing of personal data

#### 3.1. Categories and origin of personal data

NPB processes the following different categories of personal data (e.g. customer data, prospective customers, website users, suppliers, etc.). limiting their processing to a necessary minimum and in accordance with applicable laws and regulations.

- Master data (e.g. name, address, e-mail address, telephone number, date of birth, account and contract numbers or other account information, information on third parties such as family members and authorized representatives who may also be affected by the data processing, other data transmitted to the NPB as soon as registration forms or comment fields for a newsletter are filled in or certain services are used, other background information and cross-references from sources accessible to the NPB).
- Transaction and/or order data as well as risk monitoring data (e.g. data on recipients of a bank transfer, card payments, data on risk and investment profiles, data on investment products, etc.).
- Technical data (e.g. IP addresses, browser information, cookies, logging data, records of accesses and changes, content accessed by the user of the website incl. time and date of accesses).
- Marketing data (e.g. wishes, preferences).

NPB has no intention to collect sensitive data such as ethnic origin, political opinions, religious or similar beliefs, etc. (also called special category data), unless required by law.

NPB may collect personal data, as permitted by law, in particular from the following sources:

- Personal data provided by the data subject himself/herself (e.g. when opening an account, in the consultation process, when registering on our website, when using certain products or services, registering for the newsletter, in connection with job applications).
- Personal data that are necessary for products and services and are transmitted via technical infrastructure (e.g. websites, login information, e-banking, payment and manual transactions).
- Personal data from third parties, e.g. authorities, sanction lists (e.g. UN/EU), rating agencies, providers of search information.
- Publicly analyzable personal data (e.g., public register information, social media platforms).

### **3.2. Purpose and use of data**

NPB may process personal data as described above for the provision of its services or for its own lawful purposes and to the extent permitted by law. This includes in particular:

- Processing, improvement, management and execution of NPB products and services (for example, accounts, payments, cards, financing, invoices, investments, financial planning, e-banking), as well as for updating the data of persons with whom the NPB has business relationships.
- Product and service development, business decisions, statistics (e.g. evaluation and development of existing products, services and processes, determination of key figures for services and utilization figures).
- Management and monitoring of business-related decisions and risks (e.g., investment profiles, market credit and fraud risks).
- Compliance with legal and/or regulatory disclosure and reporting obligations to authorities and courts (e.g. automatic exchange of information with foreign tax authorities, orders of courts and public prosecutors, bankruptcy and debt collection offices).
- Market research, marketing, comprehensive customer support, information about services and products offered (e.g. customer events, determination of customer satisfaction, online and print advertisements, sponsoring).
- Protection of NPB's interests and rights in case of claims against NPB or its employees and customers.

NPB may communicate with you via email, physical or electronic newsletters (e.g., for news, promotional offers, event information or services) if you are a registered user (i.e., if you have created a user account for such purposes) and have opted in to receive newsletter services. You may unsubscribe at any time if you do not wish to receive marketing communications or newsletters from NPB. To do so, please contact us.

## **4. Transmission of data on the Internet**

Data transmitted over the Internet may not be adequately secured during transmission, even if the sender and receiver are located in the same country. NPB cannot guarantee the security of data transmitted over the Internet and assumes no liability in this regard. It should be noted that communications sent by you to NPB via e-mail may not be secure. If you send confidential information to NPB by e-mail, you do so at your own risk. NPB

therefore recommends that, if necessary, you use a secure mechanism to transmit your information should you contact NPB.

The sender and recipient can be identified even when information is transmitted in encrypted form, so that a third party could therefore conclude that there is a business relationship between you and NPB. Therefore, it is recommended to avoid the transmission of strictly confidential information via the Internet.

## **5. Outsourcing of business areas and services & transfer of data**

In certain circumstances, NPB may or must outsource business areas and services in whole or in part to third party service providers (e.g. payment transactions, subscription and redemption of fund units, printing and mailing of bank receipts, IT systems and other support functions). In such cases, NPB generally uses third party service providers in Switzerland and/or the EU/EEA to ensure compliance with the relevant laws and regulations. If personal data must be passed on to third party service providers, the corresponding service providers are also bound by bank client confidentiality and other applicable regulations, in particular data protection regulations. For this purpose, NPB takes the appropriate measures (e.g. by means of a contract which obligates the third party service provider to process the relevant personal data exclusively on our behalf and in accordance with our instructions).

Except for the reasons/purposes described in this privacy policy, no personal data will be disclosed to third parties without the consent of the data subject.

## **6. Data storage and retention periods**

If you have provided personal information to NPB, that information will be stored securely for the purposes stated in this Privacy Policy and for the purposes for which the information was provided.

NPB as well as its third party service providers use appropriate technical and organizational measures to protect your personal data from loss and unauthorized access.

NPB will retain your Personal Data for as long as is necessary for the purposes for which it was collected, NPB is required to do so by law, or NPB has a legitimate interest in retaining it (e.g., for evidentiary purposes, IT security, etc.).

## **7. Cookies and web analytics**

Only technical cookies such as CSRF-Token are used for the NPB website. Other cookies, which are not mandatory, are not used. The same applies to web analytics services.

## **8. Rights of the data subject**

Persons about whom NPB processes data have the right to request information in accordance with Art. 8 of the Federal Data Protection Act of 19 June 1992, after its entry into force in accordance with Art. 25 of the Federal Data Protection Act of 25 September 2020 (Data Protection Act).

Insofar as the processing of NPB is based on consent, every data subject has the right to revoke this consent at any time with effect for the future. In addition, the further rights according to the applicable Swiss data protection law can be asserted.

To exercise such rights, data subjects may contact NPB using the contact details provided in accordance with Section 2 of this Privacy Policy. NPB will process these requests in accordance with the applicable Swiss data protection law and may also refuse or only fulfill them to a limited extent in accordance with the legal regulations.

A data subject also has the option provided for in the Data Protection Act of contacting the Swiss Federal Data Protection and Information Commissioner ([www.edoeb.admin.ch](http://www.edoeb.admin.ch)).

## **9. Change of the privacy policy**

This Privacy Policy may be amended from time to time, for example resulting of changes in the law or in the way personal data is processed. In this case, the new version of the Privacy Policy will be published on the NPB website or made available to the data subjects in another appropriate manner.

September 2023