

## Brief information on data protection for clients

This "Brief information on data protection" provides you with an overview of the personal data (hereinafter also referred to as "data") that St.Galler Kantonalbank AG (hereinafter referred to as "SGKB") processes from its **clients and persons associated with them**, and for what purpose and whom you can contact with your data protection concerns.

Detailed information on data protection at SGKB and your rights can be found in our **general privacy policy**, the current version of which is published at [sgkb.ch/datenschutz](https://sgkb.ch/datenschutz) or can be obtained in printed form from SGKB.

### 1. Who is responsible for processing your data and whom can I contact?

**St.Galler Kantonalbank AG** is responsible for data processing.

If you have any questions about data protection, you can contact us as follows: **St.Galler Kantonalbank AG, Data Protection Office, St. Leonhardstrasse 25, 9001 St. Gallen, [datenschutz@sgkb.ch](mailto:datenschutz@sgkb.ch)**

### 2. What data do we process?

SGKB may process the following data of clients and persons associated with them (e.g. authorised representatives, additional cardholders, family members, heirs):

- **Master data**, in particular, identification data (e.g. name, date of birth), contact data (e.g. address, telephone number), tax data (e.g. tax number and domicile), information on personal and financial circumstances (e.g. family circumstances, professional activity, income and assets, interests);
- **Contractual data**, in particular, general data on the business relationship (e.g. information on contracts) as well as product and service-related data (e.g. account/deposit numbers, information on individual orders and transactions);
- **Preference data**, i.e. information that provides information about what needs you have or which products and services might be of interest to you;
- **Communication data**, meaning the information exchanged between you and us by email, letter, telephone or otherwise, including information relating to the use of the communications infrastructure ("metadata");
- **Technical data** in connection with the use of our electronic services (e-banking, mobile banking), e.g. the IP address and information about your terminal device, logs;
- **Other data**, e.g. video recordings when using our ATMs or visiting our branches.

### 3. For what purposes do we process your data and on what basis?

We process the above data for the following main purposes:

- To establish, manage and conduct business and contractual relationships with you;
- To comply with laws, directives and recommendations of authorities as well as internal regulations ("compliance") to which SGKB is subject or required to comply with;
- For **risk management and prudent corporate governance**, e.g. to prevent fraud;
- For **marketing and relationship management purposes**, e.g. to provide you with information and recommendations on products and services tailored to your needs;
- To **improve and develop our products and services and our operations** and for **market research purposes**;
- To ensure the security of our information technology (IT) and other infrastructure and for access controls;
- To communicate with you and authorised third parties;
- For **other purposes**, e.g. to protect our rights or as part of internal processes and administration.

Where we do not ask for your **consent** for processing, we base the processing of your personal data on the fact that the processing is necessary for the **initiation or performance of a contract** with you or that we have a **legitimate interest in** doing so, so in particular to pursue the purposes and related objectives described above and to be able to implement appropriate measures. Our legitimate interests also include compliance with legal regulations, insofar as this is not already recognised as a legal basis by the respective applicable data protection law.

If you wish to conclude contracts with us or claim services, you must provide us with data, in particular master data and contract data, as part of your contractual obligations or due to legal regulations that SGKB must observe.

#### 4. Who do we disclose your data to?

SGKB will transfer your data in particular to the following categories of recipients, taking into account bank client confidentiality:

- **Service providers** we work with to provide our services (e.g. IT providers, shipping companies, debt collectors);
- **Contractual partners, as well as persons involved** in the settlement of your business relationship (e.g. correspondent banks, payment service providers, third-party custodians, stock exchanges and trading platforms) or acting on your behalf (e.g. agents, external asset managers);
- **Partners**, if we provide you with their products or services (e.g. payment cards from Swiss Bankers or Viseca, personal loans from cashgate, vested benefits products from Swisscanto or pension products from the Pension Foundation Savings 3) or with whom we offer a bonus programme together (e.g. Stu programme with Jaywalker);
- **Authorities and other official bodies** (e.g. courts, law enforcement agencies, Swiss Financial Market Supervisory Authority) if we are legally obliged to do so, e.g. in the context of legal proceedings;
- **Other persons** (e.g. persons involved in proceedings before authorities or courts, as well as auditing and review companies).

#### 5. Does your personal data also end up abroad?

As explained in Section 4, we also disclose data to other bodies. These may not only be located in Switzerland. Your data may therefore be processed worldwide, including outside the European Union (EU) or the European Economic Area (EEA). If a recipient is located in a country without adequate data protection legislation, we contractually oblige the recipient to comply with the applicable data protection legislation, usually by entering into recognised standard contractual clauses. This may be waived if the recipient is already subject to a legally recognised set of rules to ensure data protection, or if we can rely on an exemption clause.

#### 6. How long do we process your data for?

We process your data for as long as required for our processing purposes, to comply with statutory retention periods and our legitimate interests in processing for documentation and evidence purposes, or as long as storage is technically necessary.

#### 7. What do you have to do if you share data from third parties with us?

If you provide us with data about other persons (e.g. family members, authorised representatives), we assume that you are authorised to do so and that these data are accurate. By submitting data via third parties, you confirm this. Please ensure that these third parties have been informed about this data disclosure and provide them with a copy of this information sheet or our general privacy policy.

#### 8. What rights do you have?

You can find detailed information about your rights under the applicable data protection laws in Section 14 of our **general privacy policy**.

#### 9. Can this information sheet be changed?

SGKB reserves the right to update and amend this information sheet from time to time. The version published on our website at [sgkb.ch/data-protection](https://sgkb.ch/data-protection) is the current version. – Last updated: September 2023