Privacy statement of the Pension Funds of the Julius Baer Group

1 Basic principles and purpose

This privacy statement explains how and for what purpose the Pension Fund and the Supplementary Fund of the Julius Baer Group ('Pension Funds') process your personal data ('Data'), who has access to your Data and how you can exercise your rights in relation to your personal data.

2 Persons responsible for the processing of personal data

Data processing in accordance with this privacy statement is the responsibility of:

Pension Funds of the Julius Baer Group
Bahnhofstrasse 36
P.O. Box
8010 Zurich
Switzerland
E-Mail: pensionskasse@juliusbaer.com

3 Scope of application

This privacy statement applies to all persons whose Data we process, regardless of how the persons contact us, e.g. by telephone, by post, by e-mail, on a website, at an event, etc.

It applies to the processing of both personal data already collected and personal data collected in the future. It also applies to the processing of all personal data that we process in connection with the provision of occupational benefits and our related and other activities.

In particular, our data processing activities may relate to the following categories of persons, insofar as we process personal data in this context:

- persons insured in the mandatory, non-mandatory and voluntary occupational pension plans;
- former, current and future employers or their contact persons and their employees;
- relatives of insured persons (e.g. current and former spouses, partners, parents and children) and other beneficiaries;
- authorised representatives (e.g. legal representative);
- claimants, liable persons and other persons involved;
- members of our governing bodies;
- contact persons of social and private insurers, other pension funds, vested benefits institutions and pillar 3a institutions, suppliers and partners, as well as public authorities and offices;
- persons who use other services from us;
- visitors to our websites;
- visitors to our premises;
- persons who write to us or contact us in any other way.

We are active in the area of both mandatory and non-mandatory occupational pension plans for the employees of the Julius Baer Group and the GAM Group. In relation to mandatory pension provision, we process your personal data on the basis of the applicable legal provisions (please refer to section 7 for further details). In this area, we are exempt from the obligation to provide information about our data processing. Nevertheless, we inform you in this privacy statement about our entire scope of activities, and information in this privacy statement applies in each case to the mandatory and the non-mandatory area, unless we inform you otherwise.

For information on the collection and processing of personal data when using our websites, in particular in connection with cookies and similar technologies, please also consult our cookie information.

4 Categories of personal data processed

'Personal data' is information that can be associated with a specific person. You can learn more about the origin of this data in section 5 and about the purposes for which we process this data in section 6.

4.1 Master data

Master data is the basic data about you that we need to process our contractual and other business relationships. We process your master data, for example, if you are an insured person or a relative or beneficiary of an insured person, if you are a contact person of an employer, another pension fund, a supplier or work for such an entity, or if you are a member of one of our governing bodies. We also collect master data about contact persons and representatives of contractual partners, organisations and authorities.

Depending on the capacity in which you deal with us master data includes, for example:

- Personal data such as title, first name, surname, gender, date of birth, address, e-mail address, telephone number and other contact data;
- For insured persons: also marital status and, if applicable, date of marriage or divorce or dissolution of partnership, age, details from identification data (e.g. from your passport, ID or other identification documents), within the scope of statutory provisions the AVS/AHV number, contract, policy and insured person numbers, if applicable, details of the previous pension fund or vested benefits institution, date of joining and, if applicable, date of leaving the employer, if applicable, personnel category, degree of fitness for work, level of employment, if applicable, a time limit on the employment relationship and the reported and insured annual salary and bonus and the BVG/LPP annual salary. Information on relationships with third parties who are also affected by the data processing is also included in this data, e.g. on relatives and beneficiaries;
- Health-related data in connection with the health declaration completed upon joining.
- In the case of employers and other contractual partners that are companies, we process data on contact persons, e.g. name and address, information on titles, function in the company, qualifications and, if applicable, information on line managers and employees.

4.2 Contract, event and benefit data

This is personal data related to the conclusion, processing or termination of contracts, the admission of insured persons to the occupational benefit scheme, the receipt of notifications, the processing of insured events and other benefits (e.g. payment of termination benefits). This data includes, in particular, the following data:

- Data in connection with the **affiliation contract** with the employer (e.g. type and date of the conclusion of the contract as well as its processing and administration, as well as data in connection with complaints and contract adjustments);
- Data in connection with the processing of **insured events**, e.g. the notification of the occurrence of the insured event, the claim number, information on the reason for the insured event such as accident or illness and the event date, information in connection with reviewing the insured event, information on other insurance companies and insurers and on third parties such as persons involved, and also particularly sensitive personal data (e.g. health-related data) and information on third parties (e.g. on persons involved in the occurrence of the incapacity to work or death);
- Information on the **termination benefit**, e.g. its amount and on possible and effected purchases;
- for other **benefit cases**, e.g. information in connection with the payment of the termination benefit (e.g. on its reason, but also information on accounts and vested benefits institutions and, if applicable, the consent of the spouse) or in connection with a change in marital status (e.g. date of a divorce, termination benefits acquired, advance withdrawals or disability pensions drawn and court orders in this connection);

4.3 Financial data

Financial data is personal data relating to financial circumstances, payments and the enforcement of claims. This includes information relating to payments and bank details, e.g. employer contribution payments, and to the enforcement of claims; in the case of insured persons, it also includes information on wages, purchases of occupational benefits and payments of termination benefits and pensions. We also process financial data on beneficiaries, e.g. in connection with pensions to surviving spouses and (registered) partners, children and other beneficiaries.

4.4 Communication data

When you are in contact with us or we are in contact with you, for example, when you write or call us, we process the communication content exchanged and information about the type, time and place of the communication. In certain situations, we may also ask you for proof of identity for identification purposes. Communication data includes, for example, name and contact details such as postal address, e-mail address and telephone number, the content of e-mails, other written correspondence, telephone conversations, video conferences, etc.; details of the nature, time and, where applicable, location of the communication; proof of identity such as copies of official identification documents and marginal data of the communication.

4.5 Technical data

When you use our websites, we collect certain technical data such as your IP address or a device ID. Technical data also includes the logs in which we record the use of our systems (log data). In some cases, we may also assign a unique identification number (an ID) to your end device (tablet, PC, smartphone, etc.), e.g. by means of cookies or similar technologies, so that we can recognise it. You can find more details about this in our cookie information.

The technical data includes, among other things.

- the IP address of your device and other device IDs (e.g. MAC address);
- identification numbers assigned to your device by cookies and similar technologies (e.g. pixel tags);

- information about your device and its configuration, e.g. operating system or language settings;
- information about the browser you use to access the offering, and its configuration;
- information about your movements and actions on our websites;
- information about your Internet provider;
- your approximate location and the time of use;
- records generated by the system of access and other processes (log data).

This technical data in itself usually does not provide us with any information about your identity. In the context of user accounts or registrations, however, they can be linked to other data categories - and thus possibly to your person.

Please also note our cookie information in the appendix in relation to the processing of technical data.

4.6 Data relating to members of our governing bodies

As a member of our Foundation Board, the processing of your personal data includes basic information such as identification data (e.g. name, signature, User-ID, date of birth, place of residence, nationality, gender), contact data (e.g. address, telephone number, e-mail address) and data in connection with the provision of services. This also includes your CV, background check data (e.g. criminal record or debt enforcement register), and other information related to your role.

5 Origin of personal data

5.1 Data provided

You often disclose personal data to us yourself, e.g. when you send us data or communicate with us. This can be via a portal for insured persons or other channels.

5.2 Data received

We receive personal data in connection with the provision of occupational benefits mainly from current or former employers. They are legally obliged to provide the Pension Funds of the Julius Baer Group with all the data required for the implementation of the occupational pension plan. However, we may also receive information about you from other third parties, such as companies we work with, people who communicate with us, or public sources.

For example, we may receive information about you from the following third parties:

- from employers;
- from persons close to you (family members, legal representatives, etc.), e.g. powers of attorney;
- from the Swiss postal service and public offices, e.g. for address updates;
- from credit reference agencies;
- from banks and other financial service providers, private and social insurance companies, pension funds and vested benefits institutions;
- from experts and from doctors and other service providers from whom we also receive health-related data in the event of clarifications, if necessary, with a separate declaration of release;

- from service providers;
- from authorities, courts, parties and other third parties in connection with official and legal proceedings;
- from public registers such as the debt enforcement register or the commercial register, from public bodies such as the Federal Statistical Office, from the media or from the Internet.

The Data that we process in accordance with this privacy statement does not only relate to insured persons, but often also to third parties. If you transmit data about third parties to us, we assume that you are authorised to do so, and that this data is correct. By transmitting data relating to third parties, you are confirming this. Therefore, please inform these third parties about the processing of their data by us and provide them with a copy of this privacy statement.

6 Purpose of data processing

Personal data is processed primarily for the purpose of implementing the occupational pension plan. This includes for example:

- the conclusion and processing of **affiliation contracts** with the employer, the enforcement of legal claims arising from contracts, accounting and the termination of contracts. To this end, we process in particular master data, contract, event and benefit data, financial data and communication data;
- the **admission of insured persons**. To this end, we process master data in particular. We then maintain one or more savings accounts for each insured person, for which we process information on contributions, purchases, old age retirement capital and payouts;
- reviewing and settling insured events, including coordination with other insurers such as disability insurance, and enforcing recourse claims. For this purpose, we primarily process contract, event and benefit data of the insured person and of relatives and beneficiaries, as well as health-related data and data from third parties such as external experts and service providers.

We also process personal data for related purposes, in particular the following purposes:

- **Communication**: We process personal data for communication with you, e.g. answering enquiries and customer care. For this purpose, we use in particular communication and master data and, depending on the subject of the communication, also contract, event and benefit data;
- **Contract processing:** we process personal data in connection with the initiation, administration and processing of contractual relationships, including contracts other than affiliation contracts. In particular, we use master data, contract data and communication data for this purpose.
- **Security and prevention:** We also process personal data for security purposes, to ensure IT security, to prevent fraud and abuse, and for evidence purposes. This may concern all categories of personal data mentioned in section 4.
- **Compliance with legal requirements:** We want to create the conditions for compliance with legal requirements. We therefore also process personal data to comply with legal obligations and to prevent and detect violations. This includes, for example, the fulfilment of disclosure, information or reporting obligations, for example in connection with regulatory obligations, the fulfilment of archiving obligations and assistance with the prevention, detection and clarification of criminal offences and other violations, as

well as the receipt and processing of complaints and other reports, the monitoring of communications, internal or external investigations or the disclosure of documents to an authority, if we have an objective reason to do so or are legally obliged to do so. For these purposes, we process in particular master data, contract data, financial data and communication data of employers and their contact persons, and possibly of insured persons (e.g. in case of suspicion of improper benefit payments).

- **Protection of our legal interests:** We want to be able to enforce our claims and defend ourselves against claims from others. We therefore also process personal data to protect our legal interests, e.g. to enforce claims in judicial, pre- and extra-judicial proceedings and before authorities in Switzerland, if necessary, also abroad, or to defend ourselves against claims. In doing so, we process different personal data depending on the circumstances, e.g. contact data as well as information about processes that have given or could give rise to a dispute**.**
- **Other purposes:** We may process personal data for other purposes, such as our internal operations and administration. This includes IT administration, accounting, archiving of data and management of our archives; training and education; the review or implementation of transactions under company law, such as company acquisitions, sales and mergers; the forwarding of enquiries to the relevant bodies; generally the review and improvement of internal processes.

As a member of our governing bodies, we process your data for the following purposes:

- in connection with your nomination or changes in your capacity (including declarations of integrity and loyalty and other declarations of interest);
- when you act in your capacity as a member of the Foundation Board (including passing resolutions, electing the Chairperson and Vice-Chairperson, asset management);
- for regulatory audits.

7 Legal basis

Our activities in the area of occupational benefits are governed by occupational benefits legislation, in particular by the Swiss Federal Act on Occupational Old Age, Survivors' and Invalidity Pension Provision (BVG/LPP) and the Swiss Federal Act on the Vesting in Occupational Pension Funds (FZG/LFLP) and the associated ordinances. As a federal body, the Pension Fund processes your personal data in this area within the scope of our statutory processing powers (e.g. Art. 85a et seq. BVG/LPP). In the area of non-mandatory pension provision, data processing by the Pension Funds is not subject to the data protection provisions of the BVG/LPP, but to those of the Swiss Data Protection Act (FADP). The FADP also applies to the processing of personal data that is not related to occupational pensions.

The Pension Funds collect and process personal data only for the purposes described in this privacy statement and only to the extent necessary for this purpose and within the scope of the applicable legal provisions. We store personal data only to the extent and for the duration necessary for the provision of our services.

8 Disclosure of personal data to third parties

The implementation of occupational pension plans involves not only pension funds but also other entities – employers, vested benefits institutions, other insurers, medical service providers, etc. Your Data is therefore processed not only by us, but also by third parties. You

will find below an overview of the categories of recipients to whom we may disclose personal data. You will find further information in sections 3 and 4.

- **Employer:** We may disclose personal data (address) of pension recipients to the employer for the purpose of organising retiree events, mailing Reka checks, etc. We do not disclose any data about your health or transactions such as purchases, advance withdrawals, etc. to your employer.
- **Disclosures in the case of insured events:** In connection with the notification and occurrence of an insured event and in connection with other benefits such as a transfer or payment of termination benefits, we may exchange data with, for example, vested benefits institutions, other pension funds, authorities and offices (e.g. social insurers such as, in particular, disability insurance or social welfare offices), other insurers, medical service providers and experts, banks and lenders, courts and external lawyers. As part of the processing of insured events and corresponding clarifications, we may also collect data from third parties (section 3), but also pass it on to them, e.g. to doctors and other service providers, to experts, to authorities, courts, persons providing information and lawyers. For example, we inform other social and private insurers about certain insured events in order to coordinate benefit obligations and to clarify and enforce recourse claims. We disclose personal data to courts and other pension funds or vested benefits institutions, especially in the case of divorce and inheritance disputes.
- **Authorities and offices:** We may disclose personal data to authorities, offices, courts and other public bodies if we are legally obligated or entitled to do so or if this is necessary to protect our interests, e.g. in the context of official, judicial and pre- and extra-judicial proceedings and in the context of legal obligations to provide information and to cooperate. Recipients are, for example, debt collection offices, criminal courts and criminal investigation authorities, tax offices or social security authorities. Data is also disclosed if we obtain information from public authorities, e.g. in connection with the processing of insured events (see above).
- **Other persons:** Where the inclusion of third parties arises from the purposes pursuant to section 4, Data may also be disclosed to other recipients, e.g. to persons involved in proceedings before courts or authorities (e.g. in the event of recourse against the liable third party or its liability insurer), but also to the extent necessary to potential purchasers of companies and to other third parties about whom we will inform you separately where possible. Other persons also include recipients of a payment, agents, correspondent banks, other financial institutions and other entities involved in a legal transaction.
- **Service providers:** We may also share your personal data with companies when we use their services. These service providers process the personal data on our behalf as 'data processors'. Our processors are obliged to process personal data exclusively in accordance with our instructions and to take appropriate data security measures. Certain service providers are also jointly responsible with us or independently. We ensure through the selection of service providers and through appropriate contractual agreements that data protection is guaranteed throughout the processing of your personal data. This involves, for example, IT services (such as services in the areas of policyholder administration and data storage), data analysis and enhancement, etc., or advisory services (such as by pension fund experts, lawyers, medical examiners, etc.).

We select our partners and data processors carefully and only with sufficient assurance that they have appropriate technical and organisational measures in place. Our partners and data processors are obliged to fully comply with Swiss data protection law at all times.

The aforementioned disclosures are required for legal or operational reasons. **Therefore, legal and contractual confidentiality obligations do not prevent these disclosures**. Beneficiary

data in connection with the mandatory occupational pension plan will only be disclosed within the legal framework.

Please also note our cookie information in relation to independent data collection by third-party providers whose tools have been integrated on our websites.

9 Transfer of personal data abroad

We process personal data almost exclusively in Switzerland and Liechtenstein. We use common IT services where certain data flows outside of Switzerland are unavoidable. If, in individual cases, we transfer your personal data to a country without an adequate level of data protection, we ensure the protection of your personal data in an appropriate manner.

One means of ensuring an adequate level of data protection is, for example, the conclusion of data transfer agreements with the recipients of your personal data in third countries that ensure the required level of data protection. This includes contracts that have been approved, issued or recognised by the European Commission and the Federal Data Protection and Information Commissioner, so-called standard contractual clauses. Please note that such contractual arrangements can partially compensate for weaker or missing legal protection but cannot completely exclude all risks (e.g. of government access abroad). In exceptional cases, the transfer to countries without adequate protection may also be permissible in other cases, e.g. based on consent, in connection with legal proceedings abroad or if the transfer is necessary for the processing of a contract.

10 Processing of sensitive personal data

Certain types of personal data are considered 'sensitive' under data protection law, e.g. information about health and biometric characteristics. The Pension Funds process sensitive personal data only insofar as this is necessary in connection with the implementation of the occupational pension plan, in particular when processing disability cases, and with your separate consent. You will find further details in section 4.

11 Protection of personal data

We take appropriate security measures of a technical and organisational nature to maintain the security of your personal data, to protect it against unauthorised or unlawful processing, and to protect against the risk of loss, accidental alteration, inadvertent disclosure or unauthorised access. Like all companies, however, we cannot rule out data security breaches with absolute certainty; certain residual risks are unavoidable.

Security measures of a technical nature include, for example, the encryption and pseudonymisation of data, logging, access restrictions and the storage of backup copies. Security measures of an organisational nature include, for example, instructions to our employees, non-disclosure agreements and controls. We also oblige our processors to take appropriate technical and organisational security measures.

12 Duration of processing and storage (retention) of personal data

We process and store your personal data

- as long as it is necessary for the respective purpose of processing;
- as long as we have a legitimate interest in storing it. This may be the case in particular if we need personal data to enforce or defend claims, for archiving purposes and to ensure IT security;
- for as long as it is subject to a legal retention obligation (cf. Art. 27i et seq. of the Ordinance on Occupational Old Age, Survivors' and Invalidity Pension Provision, BVV2/OPP2).

If your personal data is no longer required for the above-mentioned purposes, it will, as a general rule, be deleted or made anonymous as far as possible.

13 Profiling and automated decision-making

Personal data is not subject to automated decision-making and no personality profiles are created (no profiling).

14 Rights of the data subject

You have the following rights in relation to your personal data:

- **Right to obtain information** about what personal data the Pension Funds hold about you;
- **Right** to have inaccurate or incomplete personal data **corrected**;
- **Right to request the deletion or anonymisation** of personal data if it is not (or no longer) necessary for the implementation of the occupational pension plan;
- **Right to request the restriction of processing** of personal data if the processing is not or is no longer necessary for the implementation of the occupational pension plan;
- **Right to data portability**, i.e. the right to receive personal data concerning you in a structured and machine-readable format;
- **Right to withdraw consent with effect for the future**, provided that the processing of personal data is based on your consent.

Exercise of rights: we accept requests for information in writing, together with a clearly legible copy of a valid official form of identification (e.g. passport, identity card, driver's license).

Please note that these rights may be restricted or excluded in individual cases, e.g. if there are doubts about the identity or if this is necessary to protect other persons, to protect legitimate interests or to comply with legal obligations.

If, despite our promise and our efforts to protect your personal data, you believe that your data protection rights have been violated, you are entitled under applicable law to lodge a complaint with the Federal Data Protection and Information Commissioner (FDPIC) as the competent supervisory authority for data protection in Switzerland at any time.

Federal Data Protection and Information Commissioner (FDPIC)
Feldeggweg 1
3003 Bern
Switzerland
www.edoeb.admin.ch
Phone: +41 58 462 43 95

15 Contact

If you have any questions or feedback regarding data protection or the processing of your personal data, please contact the Data Protection Advisor of the Pension Funds of the Julius Baer Group using the following contact details:

PricewaterhouseCoopers AG
Birchstrasse 160
8050 Zurich
Switzerland
Reference: Data protection / Julius Baer PF
E-Mail: ch_privacy@pwc.ch

16 Changes to the privacy statement

We reserve the right to adapt this privacy statement at any time and without prior notice and without giving reasons. In principle, the privacy statement in its current version, which is available on the Internet and the Pension Fund Portal at the beginning of the respective processing, applies to data processing.

Version 2.0 / 1 December 2024

Appendix

Information on cookies and similar technologies

Definition of cookies and similar technologies

Cookies are files that the browser automatically stores on your device when you visit our website. Cookies contain a unique identifier (ID) that allows us to distinguish one visitor from another, but usually without identifying him/her. Depending on the purpose of their use, cookies contain other information which may relate in particular to the pages visited and the time spent on the pages. We use, on the one hand, session cookies, which are deleted as soon as the browser is closed, and, on the other hand, permanent cookies, which remain stored for a certain period of time after the browser is closed (usually between a few days and two years) and are used to recognise the visitor on a subsequent visit.

We may also use similar technologies such as pixel tags, fingerprints and other technologies to store data in the browser. Pixel tags are small, usually invisible images or program codes that are loaded from a server and thus transmit certain information to the operator of the server, e.g. whether and when a website was visited. Fingerprints are information about the configuration of your device or browser, which are collected when you visit our website, and which make it possible to distinguish your device from other devices. Most browsers also use other technologies to store data in the browser that are similar to cookies and that we can also access (e.g., 'web storage').

Cookie settings

By using our website, you allow the use of cookies. However, you can personally restrict the use of cookies via your browser. In this case, the corresponding functionality of the website may be affected by the deactivation of cookies.

Deactivation of cookies and similar technologies

You can configure your browser settings to block certain cookies or similar technologies or to delete existing cookies and other data stored in the browser. It is also possible to integrate software ('plugins') into the browser that block tracking by certain third parties.

Cookies and similar technologies used

We use the following types of cookies and similar technologies:

- Necessary cookies: necessary cookies are essential for the use of the website and its functions. These cookies ensure that you can navigate from page to page, for example, without the information entered in a form disappearing.
- Functional cookies: functional cookies allow us to offer advanced features and display personalised content. For example, these cookies allow you to save information that has already been provided (such as your choice of language).

Uses of cookies and similar technologies of other companies

The cookies and/or similar technologies we use may originate from ourselves or from third-party companies. These third parties may also be located outside of Switzerland and the European Economic Area (EEA), provided that the protection of personal data is adequately ensured.

For example, we use analytics services to evaluate how visitors use our website in order to optimise and personalise it.

In this context, third-party providers may record the use of the website in question. These recordings can be linked by the third-party providers with similar information from other websites. The behaviour of specific users can thus be recorded across multiple websites and devices. The providers can often use this data for their own purposes, e.g. for personalised advertising on their own websites and on other websites that they supply with advertising. If users are registered with the providers, the providers may associate the usage data with the data subject. In this case, they process this personal data themselves, under their own responsibility and in accordance with their own data protection regulations.

Changes to this cookie information

This cookie information may be modified over time, especially if we change our data processing practices or if new legal requirements come into effect. In general, the version of the cookie information that is valid at the beginning of a data processing operation is the one that applies to that data processing operation.

Version 2.0 / 1 December 2024