

Julius Bär

PRIVACY NOTICE OF BANK JULIUS BAER & CO. LTD.

The following information is intended to provide you with an overview of how your data is processed by Bank Julius Baer & Co. Ltd. (the Bank) as the controller of the data and outlines your rights under data protection legislation. Which specific data is processed and how it is used depends upon the requested or agreed services and the steps taken prior to entering into a contract.

1 Contact details of the Bank and the Data Protection Officer

Bank Julius Baer & Co. Ltd.
Data Protection Officer
P.O. Box
8010 Zurich
Switzerland
dataprivacy@juliusbaer.com

2 Which data is used by Julius Baer?

The Bank processes data that it receives from you and that it generates as part of the business relationship with you. This includes personal data (including sensitive personal data), i.e. data that directly identifies you as a client (e.g. name, address, telephone number, etc.), or data that allows for identification when used in connection with other information (e.g. your bank account number). In addition to data that the Bank receives directly from you, it also obtains and processes data on you from publicly available sources (e.g. the Internet, [social] media, debtor directories, land registers, trade and association registers, the print media, etc.) or that the Bank receives from other Julius Baer Group companies or from authorised third parties.

The Bank processes the following personal data in particular:

- personal details (e.g. name, address and other contact data, date and place of birth, as well as nationality);
- identification data (e.g. identification documentation data);

- authentication data (e.g. specimen signature);
- data arising from the fulfilment of obligations, in particular related to services or transactions (e.g. account and transaction data including details of the principal and the recipient);
- advertising and sales data;
- record-keeping data (e.g. minutes of consultation);
- accounting data (e.g. contact notes), details relating to your personal background and financial situation (e.g. information on compliance and/or regulatory matters such as credit reports, origin of wealth and funds, financial knowledge and experience) and/or company-related data (e.g. business activities, purpose, ownership and organisational structure as well as number of employees);
- sensitive personal data, such as your biometric data, information regarding your religious, ideological or political views or activities and relating to your health, and convictions or sanctions under criminal law;
- data regarding related third parties such as beneficial owners, employees, relatives, authorised signatories, agents and/or representatives;
- data that is transmitted and automatically collected during the use of websites, mobile applications or other electronic services provided by the Bank (electronic services). This data includes date and time of access, name of the file downloaded as well as the amount of data transmitted and the access result, your web browser, the browser language and the requesting domain and IP address. Further information can be found in the privacy policy or the legal provisions of the respective electronic service;
- other data comparable to the categories outlined above.

Julius Bär

3 For what purpose and on what legal basis does the Bank use your data?

a) To fulfil contractual obligations and take steps prior to entering into a contract

The processing of your data allows the Bank to provide you with the contractually agreed services and to take steps prior to entering into a contract. Data processing is primarily driven by banking products requested by you (e.g. accounts, loans, securities, deposits, brokerage services). The Bank uses your data, among other purposes, to identify individuals, verify documents, analyse needs, provide advice, wealth management, wealth planning, financing and credit services, for trading and to support the execution of transactions. Further details can be found in your contract documents or in the General Banking Conditions.

b) To safeguard interests

The Bank will also process your data for the following purposes in order to protect its own legitimate interests or the interests of third parties:

- prevention and investigation of criminal acts;
- testing and analysis of your potential needs and optimisation of client contact;
- risk management (e.g. calculation of eligible equity capital for banks) within the Bank and Julius Baer Group companies;
- assertion of legal claims and defence in legal disputes;
- supervision, consolidation and updating of the data relating to you that the Bank and Julius Baer Group companies process (single-client view);
- consultation and exchange of data by or with information agencies (e.g. debt collection registers) for determination of creditworthiness or default risks in the credit business or, if required, in the case of seizure protection accounts or base accounts;
- advertising, market research or surveys;
- safeguarding the Bank's IT security and IT operations;
- outsourcing of Bank functions and services to Julius Baer Group companies or to service providers and other agents appointed by the Bank;

- video surveillance for safeguarding access rights, collecting evidence in case of bank robberies, fraud prevention;
- measures to ensure the security of buildings and systems (e.g. entry controls);
- measures for business management purposes and for the development of new services and products;
- collection of personal data from publicly available sources for the purpose of market research and business development.

c) On the basis of your consent

Provided your consent has been given, the Bank is legally permitted to process personal data for specific purposes (e.g. the evaluation of transaction patterns for marketing purposes, etc.). You are able to withdraw your consent at any time.

Please note that the withdrawal of consent has no retroactive effect on the processing of your data.

Consent to the processing of customary personal data does not apply for the purposes of the EU General Data Protection Regulation 2016/679 (GDPR). For the purposes of the GDPR, as a basic principle the Bank instead invokes the following legal bases: fulfilling legal or contractual obligations, taking steps prior to entering into a contract or safeguarding legitimate interests (in accordance with this privacy notice). For the avoidance of doubt, any consent given for other reasons is not affected by this section. This includes, for example, consent to waive bank client confidentiality, consent for cross-border data processing or consent for processing personal data in accordance with the Swiss Federal Data Protection Act.

Julius Bär

d) On the basis of statutory requirements or in the public interest

The Bank's activities are subject to various regulations (e.g. the Swiss Banking Act, the Swiss Financial Services Act, the Swiss Collective Investment Schemes Act, the Swiss Anti-Money Laundering Act, the Swiss Mortgage Bond Act, FINMA regulations and circulars, tax laws), and the Bank has to fulfil requirements laid down by banking supervisory authorities such as the Swiss National Bank and FINMA. The processing of data is used, among other things, for the verification of creditworthiness as well as identity and age, the prevention of fraud and money laundering, the fulfilment of tax-related monitoring and reporting obligations, as well as the analysis, examination, assessment and management of risks of the Bank and other Julius Baer Group companies.

4 Who can access your data?

Within the Bank and other Julius Baer Group companies, access is granted only to personnel requiring your data for the fulfilment of the Bank's contractual and legal obligations towards you (need-to-know principle).

Service providers and other agents appointed by the Bank process your data for the same purpose. These include companies in the areas of IT (e.g. data hosting and processing, IT development, support and operation), administration of financial instruments and other financial assets (e.g. payments, processing of transactions and services, reporting and output services), wealth management services and ancillary activities, services related to trading, execution and processing of financial instruments and other financial assets, compliance and risk management functions, accounting (financial accounting and controlling), financing and credit services as well as other back- and middle-office activities.

If the service providers concerned need to process your data on behalf of the Bank, they are contractually required to comply with the applicable non-disclosure obligations and data protection and/or bank client confidentiality requirements.

Information relating to you is only forwarded by the Bank if this is stipulated in agreements you have concluded with the Bank, if there is a legal requirement, or if you have agreed to this (e.g. for a financial transaction on your behalf), or if the Bank is authorised to issue banking-related information. Subject to these conditions, recipients of personal data can include, amongst others:

- public bodies and institutions (e.g. the Swiss National Bank, financial authorities or law enforcement authorities) in the event of a statutory or official obligation;
- other credit and financial services institutions or similar institutions to which the Bank transfers personal data within the context of its business relationship with you (e.g. correspondent banks, custodian banks, brokers, stock exchanges or information agencies);
- other Julius Baer Group companies for risk management purposes as a result of legal or regulatory obligations, as well as service providers and other agents appointed by the Bank;
- other data recipients for which you have given your consent.

5 Does the Bank transfer data across borders?

The Bank transfers your data to countries outside Switzerland if

- the data is transferred to other Julius Baer Group companies;
- this is required for the execution of your orders (e.g. payment and securities orders);
- it is a statutory requirement (e.g. disclosure obligations under tax law);
- it is provided for in your agreements with the Bank or in the General Banking Conditions or you have given your consent in another way.

These data transfers are secured through corresponding guarantees on the part of the recipients to ensure an appropriate level of data protection.

Julius Bär

6 How long will your data be stored?

The Bank processes and retains your data only for as long as is required to fulfil its contractual and legal obligations.

If data is no longer required for the fulfilment of contractual or legal obligations, it will be deleted at regular intervals, unless it is required for further processing. This requirement could be:

- to fulfil retention obligations under trade and tax law (e.g. based on the Swiss Code of Obligations, the Swiss Value Added Tax Act, the Swiss Federal Act on Direct Federal Taxation, the Swiss Federal Act on the Harmonisation of Direct Taxation at Cantonal and Communal Levels, the Swiss Federal Act on Stamp Duties or the Swiss Withholding Tax Act);
- to fulfil specific regulations that require the Bank to retain data;
- to assert, exercise or defend legal claims.

7 What are your rights under data protection law?

The applicable data protection legislation grants you the following rights:

- requesting that information on personal data that the Bank holds on record be shared with you;
- demanding that the information be rectified should it be incorrect;
- asking that your data be deleted if the Bank is not permitted or is not legally obliged to retain this data;
- demanding that the processing of this data be restricted if
 - you have disputed the accuracy of the data stored by the Bank and it has not yet completed its assessment,
 - you object to the deletion although the Bank is obliged to delete the data;
- objecting to the processing by the Bank if
 - the Bank only processes the data on the basis of its legitimate interests – in this case it will cease the processing unless this is outweighed by its own interests or it needs to process the data in order to exercise its rights, or
 - the processing is carried out with a view to direct advertising;
- demanding that your personal data which you have provided to the Bank be transferred in a generally useable, machine-readable and conventional format.

You also have a right of appeal (as far as this affects you) to the respective data protection supervisory authority.

8 What data are you required to supply?

The Bank requires you to provide the data necessary for the acceptance and execution of a business relationship and the fulfilment of the associated contractual and/or legal obligations. Unless it obtains this data from you, the Bank will most likely be unable to enter into a contractual relationship with you.

Under the regulations on combating money laundering and the financing of terrorism in particular, the Bank is obligated to verify your identity on the basis of your identification document and in this context to collect and store your address, nationality, name, date and place of birth as well as identification data prior to the commencement of a business relationship. In order for the Bank to comply with these regulations, you are required to supply it with the necessary information. If this information changes during the course of the business relationship, you are obliged to notify the Bank without delay. If you do not provide the Bank with the necessary information, it will not be able to commence or continue a business relationship with you.

9 Is the decision-making automated?

As a basic principle, the Bank does not use fully automated decision-making for commencing and conducting its business relationships. If the Bank does apply this procedure in exceptional cases, it will inform you accordingly where this is a statutory requirement.

Julius Bär

10 Will your data be automatically processed?

In specific areas, the Bank will process your data on a semi-automated basis, the aim being to evaluate personal criteria (profiling), for example, in the following cases:

- In order to combat money laundering, the financing of terrorism and criminal acts, the Bank also conducts data assessments (among others in payment transactions). The aim of these measures is to protect you.
- The Bank uses assessment tools to provide you with relevant and appropriate information on its products and services. This enables it to carry out demand-based communication and advertising, including market and opinion research.
- As part of its assessment of your creditworthiness, the Bank uses an algorithm based on a mathematical/statistical process. This allows it to calculate the likelihood of clients being able to fulfil their payment obligations. The algorithm may, for example, include income ratios and expenditure, existing liabilities, occupation, employer, duration of employment, experiences of the business relationship to date, the contractual repayment of previous loans, as well as information from credit-rating agencies. The results of the analysis assist the Bank in the decision-making process within the context of product sales and are also incorporated into the on-going risk management.

11 Where can you find the Bank's current privacy notice?

You can find the applicable version at www.juliusbaer.com/clientdataprivacypolicy#Switzerland.

The Bank reserves the right to amend this privacy notice from time to time and will inform you of such an amendment in an appropriate manner.

12 How can you contact the Bank?

Should you have any questions about the treatment of your data, please contact your relationship manager or the Data Protection Officer mentioned in section 1, who will be able to assist you.

Zurich, November 2020