



Privacy Notice for the Account holder and Account Related Persons

Deutsche Bank (Suisse) SA (the “Bank”, “we”) recognizes the importance of protecting the personal information which has been transmitted to us. We maintain strict standards of security, measures and procedures which are specially designed to prevent misuse of personal information.

This privacy notice provides an overview of how we as controller collect and process the personal data of natural persons, namely of (i) our clients (“Account holder”), (ii) the Account holder’s beneficial owner(s), (iii) other person(s) related to the account(s) such as authorized signatories and/or holders of a power of attorney and (iv) persons who have given sureties (e.g. by way of a mortgage, a pledge or security interest on collateral, an assignment or an undertaking) to secure the Account holder’s payment obligations towards the Bank ((ii) to (iv), together hereinafter the “Account Related Persons”) to operate our business. The respective data processing depends on the services you request and/ or you have contractually agreed to. Further, this notice informs you about your data protection rights.

We kindly ask you to forward this privacy notice to the Account Related Persons.

1. Who is responsible for personal data processing and who to contact in this regard?

Controller:

Deutsche Bank (Suisse) SA
Place des Bergues 3
Case Postale
1211 Geneva 1
Tel: +41 44 227 3786
E-mail: dbs.dpo@db.com

Data protection advisor:

Deutsche Bank (Suisse) SA
Data Protection Advisor
Hardstrasse 201, Prime Tower
8005 Zurich
Tel: +41 44 227 3786
E-mail: dbs.dpo@db.com

2. What sources and types of personal data do we use?

2.1 Sources

We collect personal data we receive from you in the context of a business relationship. To the extent necessary to provide our services, we also process personal data which we lawfully obtain from the following sources:

- **Other entities within the Deutsche Bank Group**
- **Other third parties:** e.g., independent financial intermediary
- **Publicly available sources:** e.g., debtor directories, land registers, commercial registers and registers of associations, press, media, internet

2.2 Types of personal data

Depending on how you are associated with the bank account we may process the following types of personal data:

- **Identification details:** e.g., name (first name, last name), gender, nationality, date and place of birth, domicile, profession, economic and family circumstances, identification documents (e.g., national identity card, passport), authentication data (e.g., signature), identifiers (e.g., client number, account number)
- **Contact information:** e.g., address, phone number, e-mail address
- **Financial information:** e.g., payment records, transaction records, asset-related information, financial statements, liabilities, revenues, earnings, and investments, tax information (e.g., tax-ID, FATCA status, tax residency status), legal capacity
- **Other Know-Your-Customer data:** e.g., education, source of funds and wealth
- **Interaction information:** e.g., written communication, records of phone calls
- **Special categories of personal data:** e.g., political activities, information regarding criminal proceedings or sanctions
- **Investment data:** e.g., information on knowledge of and / or experience with various types of investments, investment behavior / strategy (scope, frequency, risk appetite), foreseeable changes in financial circumstances (e.g., age of retirement), specific objectives / major plans (e.g. planned acquisitions, redemption of liabilities)



3. On what legal basis and why (purposes) do we process personal data?

We process your personal data in compliance with the provisions of the Swiss Federal Act on Data Protection (FADP) and to the extent applicable the EU General Data Protection Regulation (GDPR).

- **For the performance of contractual obligations**

The processing of personal data is carried out in order to perform banking transactions and financial services pursuant to contracts with the Account holder. This may include, for example, advice, asset management and transactional services.

- **For the purposes of our legitimate interests**

To the extent necessary, we process your personal data beyond the actual performance of our contractual obligations to safeguard the legitimate interests of the Bank or a third party. Examples:

- Evaluating whether the Bank may offer further products and services to you
- Improving our products and services and our use of technology
- Asserting legal claims and mounting a defense in the event of litigation
- Ensuring and enhancing the Bank's IT security and IT operations
- Assure building and system security (e.g., admittance control) to safeguard against trespassers, to gather evidence in the event of robbery or fraud or to document disposals and deposits
- Preventing, detecting and investigating crimes
- Securing, collecting and/or enforcing the Bank's claims or collateral granted by you or third parties
- Handling complaints or requests from the Account holder or Account Related Persons
- For risk, credit and compliance management within the Deutsche Bank Group
- For credit check

- **On the basis of your consent**

In some cases, the processing of your personal data is based on your consent (e.g., certain marketing activities).

- **For compliance with a legal obligation or in the public interest**

As a bank, we are subject to various legal and regulatory obligations (e.g., contract law, supervisory law, tax law, anti-money laundering). This includes, but is not limited to, identity verification, anti-fraud and anti-money laundering measures, the satisfaction of tax law control and reporting obligations.

Further activities of the bank include in particular:

Know-your-customer activities, including regular adverse media screening, know your customer investigations, risk assessment and management, compliance activities, including continuous trade monitoring with regard to market abuse (such as market manipulation and insider dealing) as well as suitability and appropriateness, tax related activities (such as the preparation of securities statements for tax filings), credit administration (including collateral management), aggregation of financial data for reporting and analysis purposes, financial accounting and controlling, phone call and electronic communication recording, fraud monitoring and investigations, internal anti-money laundering surveillance, corruption/bribery, embargoes, sanctions monitoring and the relevant investigations, portfolio management, advisory activity, transaction execution and confirmation (such as for securities, derivative and foreign exchange transactions), any kind of back-office activities (e.g., administration of proceeds of investments interests, dividends, etc.), event reporting, payment processing (including the processing of international and Swiss domestic payments, settlement and clearing operations), administration services such as safekeeping of physical archives, printing of statements and advice, scanning of client account documentation, marketing and client communication as well as ancillary services.



4. Who receives or can access personal data?

For the purposes mentioned in this privacy notice your personal data is shared with the following recipients:

- **Other entities of the Deutsche Bank Group** (linked below)
- **Credit and financial institutions:** e.g., credit card associations, card payment providers, clearing houses, issuers of securities, hedge funds, private equities
- **Payment recipients:** e.g., beneficiaries, authorized representatives, intermediaries, clearing providers, corresponding banks, beneficiary banks
- **Service providers** including IT hardware or software providers
- **Domestic and foreign authorities, regulators and institutions:** e.g., courts, Swiss Financial Market Supervisory Authority, foreign supervisory authorities, Federal Tax Administration, foreign tax administrations, Money Laundering Reporting Office Switzerland
- **Other third parties:** e.g., external lawyers, auditors, insurers, brokers, notaries, auction houses

5. Is personal data disclosed abroad?

Personal data is disclosed abroad (i.e., transferred abroad or granting access from abroad). Such data disclosure takes place to countries which provide an adequate level of data protection or in the absence of such legislation based on (i) appropriate safeguards (e.g., standard contractual clauses and transfer impact assessment) or (ii) a statutory exception provision (e.g., explicit consent, conclusion or performance of a contract, safeguarding overriding public interests, enforcement of legal claims).

Your personal data might be processed by other entities of Deutsche Bank Group and other recipients (as listed above) in the countries where Deutsche Bank Group operates ([locations](#)).

6. How long is personal data being stored?

We process and store your personal data as long as it is necessary to fulfil the purpose for which the data was collected and to comply with legal and regulatory requirements. In general, the Bank retains personal data for ten years after the determination of the contractual relationship with the Bank. Tax related data is kept for twenty years after the end of the open tax year.

Further, we may preserve relevant information beyond the statutory retention period if it is in the Bank's legitimate interest (e.g., when litigation is ongoing or reasonably anticipated).

7. Are you under any obligation to provide personal data?

Within the scope of our business relationship, you are required to provide us with the personal data necessary for the execution of the business relationship. Without this data, we cannot offer services, carry out orders, or fulfill existing contracts. Consequently, we would have to terminate the banking relationship.

8. Is "profiling" used?

In some cases, we process your personal data automatically with the aim of evaluating certain personal aspects (profiling). For instance, we use profiling in the following cases:

- We are required by law to take anti-money laundering and anti-fraud measures. Data evaluations are also carried out (in payment transactions, among other things) in this context. These measures also serve to protect you.
- In order to provide you with targeted information and advice on products, we use evaluation tools. These enable demand-oriented communication and advertising, including market and opinion research.

9. To what extent is automated decision-making carried out?

We do not make any decisions based solely on automated processing that produce legal effects concerning you or significantly affect you. Should we nevertheless use such procedures in individual cases, we will inform you separately.



10. What are your data protection rights?

You have the following rights:

- **Access right** (meaning the right to ask about and obtain your personal data processed by the Bank)
- **Right to data portability**
- **Right to rectification**
- **Right to erasure/ destruction**
- **Right to object processing**
- **Right to prohibit processing/ disclosure**
- **Right to withdraw your consent**

The rights are not unlimited, legal limitations may apply. The Bank will examine each case individually and inform you about the result.

Consent can be withdrawn where the data processing is based on your consent. Such a withdrawal only has effect for the future, processing prior to the withdrawal is not affected.

We kindly ask you to send your request in writing together with a copy of a valid official identity document to our data protection advisor.

11. EU representative for the Bank

To the extent the GDPR applies the Bank designates the below Deutsche Bank entity as the European Union representative in compliance with Art. 27 GDPR:

Deutsche Bank AG
Data Protection Officer
Taunusanlage 12
D-60325 Frankfurt am Main
Tel: + 49 (69) 910-10000
E-mail: datenschutz.db@db.com

12. Changes to your personal data

We are committed to keeping your data accurate and up to date. Therefore, if your data changes, please inform us of the change as soon as possible.

13. Language discrepancies / original version in English

This privacy notice is published in five different languages, namely in English, French, German, Italian and Spanish. In case of discrepancies between these different languages, the English version shall prevail.

14. Updates to the Privacy Notice

This privacy notice was updated with effect for March 2026. We reserve the right to amend it from time to time. Any amendment or update to the privacy notice we will make available to you here: <https://country.db.com/switzerland/company/regulatory-information/data-protection-information>. Please visit the Bank's website to obtain the current notice.