

## Privacy notice based on the EU General Data Protection Regulation and the Data Protection Act (DSG)

Applicable for all individuals in contact with AMNIS Treasury Services AG, Zürich and AMNIS Europe AG, Vaduz (AMNIS), such as current and future customers, suppliers, and visitors.

The following privacy notice is designed to give you an overview of personal data processing at AMNIS and any resulting rights in accordance with the provisions of the EU General Data Protection Regulation (GDPR) and the Swiss Data Protection Act (DSG). The specific data processed and the way these data are used depend primarily on the services and products that are to be provided or that have been agreed. Commercial confidentiality requires AMNIS to protect your personal privacy and maintain confidentiality and, for this reason, AMNIS implements a wide range of technical and organisational privacy measures that apply to any personal data processing.

As part of our commercial relationship, we need to process personal data that are necessary to establish and implement the commercial relationship, to implement the relevant statutory or contractual obligations, and to perform services or carry out tasks. In the absence of these data, we will not generally be able to establish or maintain a commercial relationship, implement an assignment, or offer services or products. If you have any questions regarding specific data processing, or if you wish to exercise your rights, as set out in Section 5, please contact:

### The controller:

AMNIS Europe AG, Gewerbeweg 15, 9490 Vaduz, Telephone +41 44 515 87 90

### Contact details for the data protection officer

AMNIS Europe AG, Datenschutzbeauftragter, Gewerbeweg 15, 9490 Vaduz, Telephone +41 44 515 87 90, Email: [dataprotection@amnistreasury.com](mailto:dataprotection@amnistreasury.com)

## 1 Nature and source of data

We collect and process personal data obtained during the course of our commercial relationship. Personal data can be processed during any phase of the commercial relationship, and the data vary depending on the group of people.

As a basic principle, we process personal data that you provide using submitted contracts, forms, correspondence and other documentation. Insofar as this is necessary to perform the service, we also process personal data that are generated or transmitted based on the use of products or services, or that we have rightfully received from public institutions (e.g. UN and EU sanctions lists) or from other companies within the AMNIS Group. Finally, personal data from publicly available sources (trade and association registers, the press, online) may also be processed. In addition to customer data, we may potentially process personal data from other third parties involved in the commercial relationship, such as data from authorised representatives, proxies, legal successors and economic beneficiaries for the commercial relationship. Please ensure any potential third parties are aware of this privacy notice. The term *personal data* is understood to refer in particular to the following categories of data:

## Master data

- personal data (e.g. name, date of birth, nationality)
- address and contact details (e.g. physical address, telephone number, email address)
- identification information (e.g. passport or ID card details)
- authentication data (e.g. specimen signature)
- data from public sources (e.g. tax numbers)

## More detailed basic data

- information about services and products used (e.g. sales data in payment transactions, information for beneficiaries, currency exchanges completed, interactions with our web platform)
- information about financial characteristics and the financial situation (e.g. source of the asset, economic background)
- technical data and information about electronic communication with AMNIS (e.g. record of access and interactions on our web platform).
- image and sound files (e.g. video or telephone recordings)

## 2 Purpose of data processing

We process personal data in accordance with the provisions in the GDPR and the Data Protection Act (DSG) for the following purposes and/or based on the following legal grounds:

- To perform a contract or to implement precontractual measures for the provision and arrangement of financial services and for order processing.
- To fulfil legal obligations or in the public interest, particularly to comply with legal or regulatory requirements (e.g. to comply with GDPR, Data Protection Act [DSG] and Payment Services Act [Zahlungsdienstgesetz], due care and money laundering regulations, market abuse regulations, tax laws and treaties, monitoring and reporting obligations, risk management).
- To protect our own or third parties' legitimate interests for specifically defined purposes; in particular, for product development, marketing and advertising, audits and risk management, reporting, statistics and planning, preventing and investigating offences, video surveillance to protect property rights and to defend against threats, recording telephone calls.
- Based on your consent, which you provided for us to perform and arrange payment services or based on an order, for example the disclosure of data to group companies, service providers or AMNIS's contractual partners. You have the right to withdraw your consent at any time. The withdrawal of consent is not retroactive and has no impact on the legality of any data processed before consent was withdrawn.

We reserve the right to process personal data collected for one of the aforementioned purposes for other purposes if these are compatible with the original purpose or if the processing is permitted or required under a legal provision (e.g. reporting obligations).

### 3 Access to personal data and retention period

Access to your data may be obtained by bodies inside and outside AMNIS. Within AMNIS, your data can only be processed by bodies or employees if this is required to fulfil our contractual, legal and regulatory obligations and to protect our legitimate interests. Commercial confidentiality and data protection rules also allow for personal data to be obtained for these purposes by group companies, service providers or other agents. Processors can include companies categorised as bank services, distribution partners, IT services, logistics, printing services, debt collection, consultancy, plus sales and marketing firms. In addition, recipients of your data in this context could include other financial services institutions or comparable bodies, who we transmit personal data to in order to implement the commercial relationship (e.g. banks, other payment provider information services). Where there is an applicable legal or regulatory obligation, public authorities and institutions (e.g. supervisory authorities, tax authorities etc.) may also obtain your personal data. Transmission of data to countries outside the EU or the EEA or Switzerland (so-called third countries) will only take place, insofar as

- this is necessary to implement precontractual measures or to fulfil a contract, to perform services or to process orders (e.g. to execute payment orders),
- you have granted consent (e.g. for customer support by another AMNIS group company),
- this is necessary on important public interest grounds (e.g. due to money laundering), or
- this is required in law (e.g. legal reporting obligations).

We process and store personal data throughout the duration of the commercial relationship, unless specific data are subject to deletion obligations resulting in a shorter retention period. It is important to note that our commercial relationships can be effective for years. The retention period also depends on the necessity and purpose of the relevant data processing. If the data are no longer required to fulfil contractual or legal obligations or to protect our legitimate interests (fulfilment of purpose) or if previous consent is withdrawn, the data will be periodically deleted unless further processing is necessary due to contractual or legal retention periods and documentation obligations, or due to the need to preserve evidence during the relevant statutory limitation period.

### 4 Automated decision-making and profiling

Our decision-making is never based exclusively on automated processing of your personal data. Insofar as these processes are used in specific instances, we will notify you of this separately in accordance with the statutory regulations.

There are areas where your personal data undergo automated processing at least to some extent. This is aimed at evaluating certain personal aspects, insofar as we are obliged to do this under the legal and regulatory provisions (e.g. to prevent money-laundering), as part of requirements analysis for services and products, and as part of the risk management process. AMNIS reserves the right in future to analyse and evaluate personal data (including relevant third-party data) using automated processes in order to identify key customer characteristics or to predict developments and create customer profiles. In particular, this may be done to support auditing and to provide offers and information, which AMNIS will make available to its customers where applicable. Customer profiles can also result in automated individual decisions in future, for example

to accept and carry out customer orders automatically. AMNIS shall ensure a suitable contact person is provided if the customer wishes to comment on a specific automated decision and if the option of commenting in this way is prescribed by law.

## 5 Privacy rights

With regards to your personal data, you have the following privacy rights pursuant to GDPR:

- Right of access: You have the right to obtain confirmation from AMNIS as to whether and to what extent your personal data are being processed. These data are available for you to download at any time on the AMNIS platform.
- Right to rectification, erasure and restriction of processing: You have the right to obtain rectification of any inaccurate or incomplete personal data. Furthermore, your personal data must be erased if the data are no longer necessary in relation to the purposes for which they were collected or processed, if you have withdrawn your consent, or if the data have been unlawfully processed. In addition, you have the right to obtain restriction of processing.
- Right to withdraw: You have the right to withdraw your consent at any time to the processing of your personal data for one or more specific purposes insofar as the processing was based on your explicit consent. Please note this withdrawal is not retroactive. Processing that took place before consent was withdrawn shall be unaffected. Furthermore, the withdrawal of consent has no impact on data processing based on other legal grounds.
- Right to object: You have the right to raise an informal objection to your data processing in a specific instance on grounds relating to your particular situation, insofar as the processing is in the public interest or to protect a legitimate interest pertaining to AMNIS or a third party. In addition, you have the right to raise an informal objection to the use of personal data for marketing purposes. If you object to the processing of your personal data for direct marketing, we will cease processing your personal data for this purpose.
- Right to lodge a complaint: You have the right to lodge a complaint with the applicable Liechtenstein or Swiss supervisory authority. You can also contact a different supervisory authority for an EU or EEA member state, for example in your place of residence or place of work or the location of the putative infringement.

The contact details for the responsible data protection authority in Liechtenstein are:

Datenschutzstelle Liechtenstein, Städtle 38, Postfach,

FL-9490 Vaduz, Principality of Liechtenstein

Telephone no. + 423 236 60 90, Email: [info.dss@llv.li](mailto:info.dss@llv.li)

Disclosure requests and objections should preferably be submitted in writing to the data protection officer. The data protection officer is also available to be contacted regarding any other matters involving data protection regulations.

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