

## 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 (hereinafter 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 7, please contact:

#### The controllers:

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

AMNIS Treasury Services AG, Baslerstrasse 60, 8048 Zürich  
Telephone +41 44 515 87 90, Email: [info@amnistreasury.ch](mailto:info@amnistreasury.ch)

#### Contact details data protection officer:

suasio GmbH – Frank Dreher, Dr. Rudolf-Eberle-Str. 2a, 76534 Baden-Baden  
Telephone +49 7223 956660, Email: [datenschutz@suasio.de](mailto:datenschutz@suasio.de), [www.suasio.de](http://www.suasio.de)

## 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 amnis. 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)

### Pseudonymised in-app behavioural data

When you use the authenticated amnis webapp (app.amnistreasury.com), we collect pseudonymised behavioural data about how the application is used. These data are collected under an internal user identifier rather than under your name and may include:

- page-view and click events within the webapp (for example, which screens are opened, which buttons are pressed, which features are used)
- session information such as start and end time, duration, language, time zone
- device and connection information such as device type, operating system, browser, screen resolution and IP address
- interactions with in-product AI features (see Section 5)

These data are not used to identify you individually outside the amnis platform. Further information on this processing is set out in Section 4.

## 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, product analytics and user-experience improvement, 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, to set non-essential cookies and similar technologies, or based on an order, for example the disclosure of data to group companies, service providers or amnis' contractual partners. You have the right to withdraw your consent at any time. The withdrawal of consent is not retro-active 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, recipients, retention and international transfers

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 acting as processors on our behalf. Processors can include companies categorised as bank services, distribution partners, IT services, logistics, printing services, debt collection, consultancy, plus sales and marketing firms, and providers of product-analytics and customer-engagement services (see Section 4). Recipients of your data in this context may also include other financial services institutions or comparable bodies, to which we transmit personal data 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.

Where personal data are transferred to countries outside Switzerland, the European Union or the European Economic Area (third countries), such transfers are made under one of the following mechanisms, applied in this order of precedence: (i) an adequacy decision of the European Commission or the Swiss Federal Council; (ii) the EU-US Data Privacy Framework (and its UK Extension and Swiss-US Extension) for transfers to recipients self-certified under that framework; or (iii) the EU 2021 Standard Contractual Clauses, including the United Kingdom International Data Transfer Addendum where applicable. Further information on the safeguards used can be obtained from the data protection officer. Transfers based on a derogation under Article 49 GDPR are used only in narrowly defined exceptional cases and are not relied upon for systematic, ongoing processing.

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. 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. Specific retention periods apply to the in-app behavioural data described in Section 4.

### 4 In-app analytics

To understand how our authenticated webapp (app.amnistreasury.com) is used, to improve the product, to identify and resolve usability issues and to prioritise feature development, amnis uses one or more product-analytics service providers, which act as processors on our behalf. Where the chosen provider offers a European data-residency option, amnis selects it, so that pseudonymised

event data is stored and processed primarily on infrastructure located in the European Union or the European Economic Area.

### Categories of data processed

- page-view and click events within the webapp
- session information (start and end time, duration, language, time zone)
- device and connection information (device type, operating system, browser, screen resolution, IP address)
- an internal user identifier (pseudonym)
- interactions with in-product AI features (see Section 5)

Our product-analytics providers do not receive transactional payment content, account numbers, beneficiary details or other customer-confidential transactional data. The data are pseudonymised: they are linked to an internal user identifier and are not used by our providers to identify you individually outside the amnis platform.

### Purposes and legal basis

- Product analytics, user-experience improvement and feature optimisation.
- Legal basis: your consent under Article 6(1)(a) GDPR (and equivalent provisions of the DSG) for the storage and reading of information on your device, given through the in-app consent layer before any analytics tool is initialised; and our legitimate interest under Article 6(1)(f) GDPR in analysing the use of our webapp to maintain and improve it.
- You can withdraw your consent at any time through the in-app privacy settings; withdrawal does not affect the lawfulness of processing carried out before withdrawal.

### Retention

Pseudonymised event data are retained by our product-analytics providers for a period proportionate to the analytical purpose, typically not exceeding two years from collection. Where a provider offers configurable retention, amnis applies the shortest setting consistent with the purpose. We do not retain pseudonymised event data beyond the period necessary for the purposes described above, and the retention configuration is reviewed periodically against the principle of storage limitation (Article 5(1)(e) GDPR). Where a more granular feature (such as session recording) is activated, a shorter retention period applies and is communicated in the in-app privacy notice.

### Recipients and sub-processors

Our product-analytics providers may engage a limited number of sub-processors to deliver their service (for example for cloud hosting, logging, security monitoring or AI features). The current list of product-analytics providers and their relevant sub-processors is maintained by amnis and made available on request through the data protection officer. Some sub-processors may be located outside the EU/EEA.

### Lawful basis for transfers

Where data are transferred to recipients located outside the EU/EEA in connection with this processing, the transfers are protected by: (i) the EU-US Data Privacy Framework (including its UK Extension and Swiss-US Extension) for recipients in the United States that are self-certified under that framework; (ii) the EU 2021 Standard Contractual Clauses, including the UK International Data Transfer Addendum where applicable, for recipients that are not covered by the Framework; and (iii) adequacy decisions where applicable.

## 5 Artificial-intelligence features

In line with our use of artificial intelligence (AI) and machine learning (ML) across amnis' operations (as described in our framework agreement and in the amnis AI Use Statement), some of the tools and service providers that we engage offer AI-enabled features. Where amnis uses such features, the following principles apply.

- AI-assisted analysis of in-app behavioural data. Some of our product-analytics providers offer AI-enabled features that help our internal teams query and analyse the pseudonymised event data described in Section 4 (for example natural-language interfaces, integrations with internal AI tools, or AI-generated summaries). These features rely on generative-AI sub-processors engaged by the relevant provider. Where the provider offers EU-instance routing for these features, amnis selects it; residual transfers to recipients outside the EU/EEA are protected by the mechanisms described in Section 4.
- Cross-departmental AI assistance. amnis personnel use enterprise AI assistants across departments to support internal tasks (for example drafting, summarisation, document review, knowledge retrieval and research, and to support – but not replace – human reviewers in compliance and onboarding processes). The safeguards that apply to this use, including human oversight, data minimisation and the prohibition on automated individual decision-making within the meaning of Article 22 GDPR, are set out in the amnis AI Use Statement.

amnis has contractually required that prompts and outputs processed through these AI features are not used to train the underlying AI providers' or the third-party tools' own models, unless we have expressly agreed otherwise in writing. The current list of AI providers we engage is maintained by amnis and made available on request through the data protection officer

## 6 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.

## 7 Privacy rights

With regard to your personal data, you have the following privacy rights:

- Right of access: You have the right to obtain from amnis whether and to what extent your personal data are being processed (e.g. categories of personal data being processed, purpose of processing).
- 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. For pseudonymised event data processed by our product-analytics providers (Section 4), amnis uses the data-subject-rights tooling made available by those providers to action these requests.
- Right to data portability: Where applicable, you have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format.
- Right to withdraw consent: 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 (this includes consent to in-app analytics under Section 4 and to non-essential cookies on [amnistreasury.com](https://amnistreasury.com)). 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 684  
FL-9490 Vaduz, Principality of Liechtenstein  
Telephone +423 236 60 90, Email: [info.dss@llv.li](mailto:info.dss@llv.li)

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

Office of the Federal Data Protection and Information Commissioner FDPIC  
Feldeggweg 1  
CH-3003 Berne, Switzerland  
Telephone +41 58 462 43 95

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.

## 8 Updates to this privacy notice

amnis may update this privacy notice from time to time to reflect changes in our services, our processors or the legal framework. The current version is the one published on [amnistreasury.com](https://amnistreasury.com). Material changes will be communicated through the channels described in the framework agreement.

*Edition: June 2026*