



Privacy Notice



The privacy notice sets out the implications relating to the new Federal Law on Data Protection (nLPD), which came into force on September 1st, 2023. It is addressed to all clients, prospects, or persons linked to them, as well as to visitors to the BBGI Group SA website (hereinafter "Concerned Persons"). The information contained in this privacy notice are the ones we are required to communicate to you in accordance with data protection legislation. It is important that you read this document so that you know exactly what kind of personal data we collect about you, what we do with them and with whom we may share it.

BBGI Group SA (hereinafter "BBGI") is committed to protecting your personal data and respects your privacy. This document informs you about how we handle your personal data when you enter into a contract with BBGI, when you use our services or products, and when you visit our website, as well as about your rights regarding privacy and how the law protects you in this respect.

BBGI is a «data controller». This means that, except when we are obliged to process data for legal reason, BBGI is responsible for deciding how we store and use your personal data.

Data protection principles

We comply with data protection legislation. This means that any personal information we hold about you must be :

- Used lawfully, fairly and transparently ;
- Collected only for valid purposes that we have clearly explained to you, and always processed in a way that is compatible with these purposes ;
- Relevant to the purposes we have told you about, and limited to those purposes only;
- Kept securely ;
- Accurate and kept up to date ;
- Kept only as long as necessary for the purpose we have told you about and/or as required by laws.

What data is collected about you?

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer various categories of personal data about you, such as (non-exhaustive list) :

- Identity data such as first name, last name, identification number or similar identifier, marital status, title, date of birth, gender, passport photocopies, etc. ;
- Contact data such as home/domicile address, e-mail address and telephone/fax numbers, etc. ;
- Financial data such as bank account and payment card details, as well as your financial position, status and history, wealth, sources of wealth, revenues, professional activity (past and present), solvency reports, level of knowledge and experience, etc. ;
- Transaction data such as information on payments made or received by you, explanations of the reasons for such transactions (including related documents), source of funds, as well as other information on the products and services you have acquired from us or in which you have

invested in, etc. ;

- Marketing and communication data, such as your preferences regarding the receipt of marketing from us, as well as your communication preferences.

We do not collect any information belonging to particular categories of sensitive personal data relating to you (race, ethnic origin, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information relating to your health, genetic and biometric data, information relating to any criminal convictions or offences, etc.), unless this is necessary for lawful reasons and/or for the improvement of services relating to contracts we have entered into with you.

Comment How is your personal data collected ?

BBGI may collect, use and share personal data about you in connection with your transactions, your use of our products and services, and your relationship with BBGI.

We collect information about you using a variety of methods, including, but not limited to, the following:

Direct interactions : You can provide us with your personal data yourself by filling in forms or by communicating with us by post, telephone, e-mail, through our website, or by handing us your business card, or in any other way. This includes, for example, personal data that you provide when you:

- Request our products or services ;
- Grant BBGI management authority over an account with a Bank ;
- Request that marketing materials be sent to you .

Publicly available sources : we may obtain additional information about you from publicly available sources, such as the Internet, the media, data collection companies, commercial or dept registers, etc., or from third parties we may appoint.

How do we use your personal data ?

We only use your personal data when we are authorized to do so by law, or when you authorize us to do so. We usually use your personal data in the following cases :

- When we need to carry out the contract we have entered into with you or are about to enter into with you.
- When such use is necessary to satisfy our legitimate interests (or those of a third party) and your own interests or fundamental rights do not override those interests.
- When we must comply with a legal or regulatory obligation.

To ensure a faithful execution of your instructions, to improve our services and for security reasons, we may monitor and/or record your communications with us, such as telephone calls.

Concerned Persons, by soliciting or entering into a business relationship with BBGI, by negotiating or entering into a mandate with BBGI, or by transmitting data to BBGI, confirm that they have read and accepted this privacy Notice and the processing described herein.

Marketing

We strive to provide you with choices regarding certain uses of your personal data, in particular those relating to marketing and advertising.

If you receive marketing directly from us, you can ask us to stop sending you marketing at any time by contacting your relationship manager or by using the communication tool provided for this purpose (unsubscribe button) which is available in all marketing communications (e-mail).

If you opt out of receiving such marketing communications, this will not apply to any personal data you have provided to us in connection with the acquisition of a product/service or other transactions.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that this reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and provide you with the legal basis which allows us to do so.

Information concerning a change of purposes may happen through an amendment of the present privacy notice. We therefore strongly encourage you to consult this privacy notice on a regular basis.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Policy regarding the use of Cookies

Cookies are small data files that are stored on your terminal and can be used to study how visitors use our website.

In general, the only cookies used by BBGI are "Technical" cookies, which you must accept as they are mandatory to ensure the proper functioning of the website and its features.

No other type of cookie is used on our website (e.g. performance cookies for traffic measurement, etc.) and BBGI therefore does not collect any personal information about you via this channel or about your use of our website.

Data sharing

We may need to share your data with third parties. We require third parties to ensure the security of your data and to process it in accordance with applicable law.

Why we may share your personal information with third parties ?

When we use your personal data, we may transfer and disclose them in particular to (non-exhaustive list) :

- To any third party providing services to BBGI or its agents ;
- To any authorities (such as stock exchanges), where we are required to do so by law or regulations ;
- Payment recipients, beneficiaries, intermediaries, correspondent and agent banks, custodians, clearing houses and clearing and settlement systems ;
- To other financial institutions, brokers, fraud prevention agencies, trade associations, credit reference agencies and debt recovery agents ;
- To any duly selected third party involved in the maintenance and operation of IT systems, the development, operation and maintenance of software and applications, and the establishment and implementation of processes designed to ensure and/or improve data availability, operability, integrity and security ;
- Any duly selected third party involved in certain activities, in particular those related to information and communication technologies ;
- To any other duly selected third party :
 - ◊ we use to provide services to you ;
 - ◊ for marketing purposes, where you have given your marketing consent.

The above-mentioned third parties may also process, transfer and disclose personal data, and may be located in countries whose data protection legislation does not necessarily provide the same level of data protection as in Switzerland and/or the EU.

The General Terms and Conditions bind us further describe our respective duties and obligations in this regard and will set out the limitations to the aforementioned sharing of information set out under any other applicable laws and regulations, in particular in relation to banking secrecy.

Personal Data Security

We have implemented appropriate security measures to prevent your personal data from being accidentally lost, used in an unauthorized way, accessed without authorization, altered or disclosed.

As much as possible, we restrict access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data in accordance with our instructions and are subject to a duty of confidentiality.

Profiling

BBGI does not in principle use automated decision-making processes on Concerned Persons or anyone connected with them. However, should this be the case, BBGI will comply with the applicable law and regulatory requirements.

Data retention – How long will we use your personal information

We will only retain your personal data for as long as is necessary to fulfill the purposes for which it was collected for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for your personal data, we take into account the amount, nature and sensitivity of the personal data, the risk of potential harm that would result from unauthorized use or disclosure of the data, the purposes for which we process the data and whether these purposes can be achieved by other means, and the applicable legal requirements.

Personal data may be kept for a longer period when a longer retention period is required by law, by a judicial decision (or a decision of any other competent authority) or by BBGI's internal regulations, or in order to establish, exercise or defend our rights.

Your rights regarding your personal information

Under certain conditions, the law grants you :

- A right of access to your personal information. This enables you to receive a copy of the personal information we hold about you and to check that we are processing it lawfully.
- A right to rectify the personal information we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- A right to erasure of your personal information. This enables you to ask us to delete or remove personal information when we no longer have a legitimate reason to process it. You are also entitled to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below). Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons, of which we will inform you, where appropriate, at the time of your request.
- A right to object to the processing of your personal data when we base our decision on our legitimate interests and, for a reason relating to your particular situation, you wish to object to the said processing. In some cases, we may demonstrate that we have compelling legitimate grounds for continuing to process your data.

- A right to limit the processing of your personal data. This enables you to have the processing of your personal data suspended, for example if you want us to establish its accuracy or the reason for processing it. In some cases, we may be able to demonstrate that we have compelling legitimate grounds for continuing to process your data.
- A right to transfer your personal data to a third party.

To exercise their rights, Concerned Persons may contact BBGI at dpo@bbgi.ch. Requests will be processed by BBGI in accordance with Swiss law. In accordance with the legal provisions on data protection, certain requests may be handled in a restricted manner or refused altogether.

Right to revoke your consent

In some cases, where you have consented to the collection, processing or transfer of your personal information for a specific purpose, you have the right to revoke your consent at any time. To do so, please contact us at the address dpo@bbgi.ch. Once we have been informed that you have revoked your consent, we will stop processing your information for the purpose(s) you originally approved, unless there is another legitimate legal basis for us to continue processing.

If you revoke your consent, we may not be able to provide you with certain products or services. We will inform you of this, if applicable, at the time you revoke your consent.

Change to this Privacy Notice

We reserve the right to update this privacy notice at any time. Any changes will be posted on the BBGI website (<https://bbgi.ch>). In addition, we may inform you in other ways, from time to time, about the processing of your personal information.

Third-Party Links

Our website may contain links to third-party websites, plug-ins and applications. By clicking on these links or authorizing these connections, you may be allowing these third parties to collect or share data about you. We do not control such third-party websites and are not responsible for their privacy notices. When you leave our website, we invite you to read the privacy notice of any other website you visit.





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