



**LGT Bank Ltd.**  
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## **Data privacy notice for natural persons EU General Data Protection Regulation (GDPR) and Data Protection Act (FADP)**



Applies to contractual partners, service providers and suppliers

Valid from June 2021

This data privacy notice is intended to provide an overview of the processing of the personal data held at LGT and the resulting rights under the provisions of the GDPR and the FADP. Which data in particular is processed and the way in which it is used depends essentially on the relevant agreed services. We are committed to protecting privacy and to confidentiality. For this reason, we implement a number of technical and organizational data protection measures relating to the processing of personal data.

Within the context of our business relationship, we need to collect and process the personal data which is required for establishing and conducting the business relationship as well as for complying with the associated statutory and contractual obligations. Without this data, we are generally not in a position to enter into or maintain a business relationship.

Should affected natural persons have any questions about individual types of data protection or wish to exercise their rights, they can contact the following bodies:

Data protection officer for the LGT Group companies:

LGT Group Holding Ltd.  
Data Protection Officer  
Herrengasse 12  
9490 Vaduz  
Liechtenstein  
Phone: +423 235 11 22  
E-mail: lgt.datenschutz@lgt.com

Controller or body with which a business relationship exists:

LGT Bank Ltd.  
Herrengasse 12  
9490 Vaduz  
Liechtenstein  
Phone: +423 235 11 22  
E-mail: info@lgt.com

LGT Financial Services Ltd.

Herrengasse 12  
9490 Vaduz  
Liechtenstein  
Phone: +423 235 24 44  
E-mail: lgt.fs@lgt.com

LGT Group Holding Ltd.

Herrengasse 12  
9490 Vaduz  
Liechtenstein  
Phone: +423 235 11 22  
E-mail: info@lgt.com

### **1 From which sources does the data originate and what types (categories) of data are processed?**

We process personal data which we have received in the context of our business relationships (e.g. via contracts, forms, business cards, correspondence or other documents or on the basis of consent from affected natural persons). Where necessary for conducting a business relationship, we also process personal data that is generated through the provision or use of services or which we have obtained legitimately from third parties, public agencies or other LGT Group companies. Personal data from publicly available sources (e.g. the press or the internet) may also be processed.

Personal data may be processed at any stage of a business relationship and differ depending on the type of business relationship.

The data we process includes in particular the personal data of natural persons involved in the business relationship, such as representatives, employees and authorized agents, for example. We ask you to inform these people about this data privacy notice.

We process the following categories of data in particular:

- Personal details (e.g. name, date of birth and nationality)
- Address and contact details (e.g. physical address, telephone number and e-mail address)
- Identification data (e.g. passport or identity card data) and authentication data (e.g. specimen signatures)
- Data from public sources and registers (e.g. the commercial register)
- Information relating to products and services used (e.g. investment experience and investor profile, advisory records and turnover data from payment services)
- Information about financial characteristics and on the financial situation (e.g. portfolio and account numbers, creditworthiness data and the origin of assets)
- Information on the professional and personal background (e.g. professional activity, hobbies, desires, preferences)
- Technical data and information about electronic communication with LGT (e.g. access or change logs)
- Image and audio data (e.g. video or voice recordings)

### **2 For what purposes and on what legal basis is personal data processed?**

We process personal data in accordance with the provisions of the GDPR and the DPA for the following purposes and on the following legal bases (Art. 6(1) GDPR):

- *For the fulfillment of a contract or to take steps prior to entering into a contract (Art. 6(1)(b) GDPR)* within the context of providing or using services and using applications for internal and external communications in connection with business relationships (via audio, video, screen sharing, chat features). The purposes of data processing are primarily determined by the specific service.

- *For compliance with a legal obligation (Art. 6(1)(c) GDPR) or in the public interest (Art. 6(1)(e) GDPR)*, in particular to comply with statutory or supervisory requirements (e.g. GDPR, DPA, banking law, due diligence, money laundering and market abuse provisions, tax laws and agreements, control and reporting obligations and risk management).
- *To safeguard our legitimate interests or those of third parties (Art. 6(1)(f) GDPR)* for specifically defined purposes, particularly for checking affordability and creditworthiness, for setting up and realizing collateral, in the context of using applications for internal and external communications in connection with business relationships (via audio, video, screen sharing, chat features), for product development, for advertising and marketing purposes (provided the natural persons concerned have not objected to the use of their personal data for these purposes), for compliance with the rights of the data subject (e.g. right of information), for the prevention and solving of criminal offenses, for video monitoring in connection with the right to allow or deny access to the premises and with the aversion of danger, for documenting discussions, for ensuring IT security and IT operation as well as building and equipment security, for the assertion and enforcement of legal claims, for business and risk control, for reporting, for statistical and planning purposes, and for performing Group-wide coordination tasks.
- *On the basis of consent (Art. 6(1)(a) GDPR)* granted to us by the natural persons concerned for advertising and marketing purposes or certain other purposes.

With regard to processing personal data collected for one of the above purposes, we reserve the right to also continue processing it for the other purposes if this is consistent with the original purpose or permitted or stipulated by law.

### **3 Who obtains access to personal data and for how long is it stored?**

Personal data may be accessed by the internal and external bodies which require the data to provide or use the services and to comply with our contractual and statutory obligations. Within LGT, bodies or employees may only process personal data if they require it to comply with our contractual, statutory and supervisory obligations and to protect legitimate interests. Other LGT Group companies, service providers or vicarious agents may also obtain personal data for these purposes. Such recipients may be companies relating to banking services, distribution agreements, IT services, logistics, printing services, collection, advice and consulting as well as distribution and marketing. Recipients of the data in this context may also include banks and financial service institutions or comparable institutions to which we transfer personal data for conducting the business relationship (e.g. correspondent banks, custodian banks, brokers, stock exchanges or information agencies).

Where there is a statutory or supervisory obligation, personal data may also be passed on to public agencies or institutions (e.g. supervisory or tax authorities).

Insofar as data is transferred to countries outside the European Union (EU) or the European Economic Area (EEA) (third countries) and the European Commission has not determined that the country in question offers an adequate level of security, such a data transfer will be carried out using suitable measures (e.g. recognized EU standard data protection clauses) so that compliance with data privacy provisions can be guaranteed. Further information in this regard can be requested from the data protection officer. If the situation does not permit the use of suitable guarantees, data will only be transferred insofar as this is required for the implementation of pre-contractual measures, to fulfill a contract or for the performance or use of services, the natural persons concerned have given their explicit consent, it is necessary for important reasons of public interest (e.g. preventing money laundering) or it is required by law (e.g. reporting obligations under tax law).

We process and store the personal data throughout the duration of the business relationship unless shorter mandatory deletion periods apply for specific types of data. It should be noted that our business relationships may last for years. In addition, the storage period is determined by the necessity and purpose of the respective data processing. If the data is no longer required for compliance with contractual or statutory obligations or to safeguard our legitimate interests (achievement of the purpose) or if granted consent is withdrawn, the data is deleted periodically unless further processing or storage is necessary due to contractual or statutory retention periods or documentation obligations or to preserve evidence for the duration of the applicable statute of limitations.

### **4 Is automated decision-making and/or profiling carried out?**

In principle, our decisions are not based exclusively on automated processing of personal data. If we do use such procedures in individual cases, we inform thereof separately insofar as this is required by law.

There are business areas in which personal data is processed at least partly by automated means. The objective of this is to evaluate certain personal aspects insofar as we are obliged to do so by statutory and regulatory requirements (e.g. to prevent money laundering), to conduct needs analyses for services as well as for risk management.

Personal data (including data of third parties concerned) may be analyzed and evaluated in order to identify significant personal characteristics of the contracting party or predict developments and draw up client profiles. This may prove useful in particular for the purposes of audits, the provision of individual advice and the preparation of offers and information that we and LGT Group companies may choose to provide. Profiles may also lead to automated individual decisions, e.g. in order to accept and execute online banking instructions automatically.

### **5 What if we are jointly responsible with other data processors?**

This data privacy notice also applies to the processing of personal data by other controllers if we collaborate with one or more other controllers (especially LGT Group companies) within the context of the provision or use of the services and exchange personal data with the other controllers on the basis of this collaboration.

These other controllers are obliged:

- to likewise comply with the relevant provisions of the GDPR and provide us with proof of their compliance,
- to keep the required records of processing activities,
- to take suitable technical and organisational measures to protect personal data,
- to conduct a data protection impact assessment if processing is likely to result in a high risk to the rights and freedoms of natural persons, and to notify us thereof where applicable,
- to notify us without delay about any data protection violations,
- to support us in exercising the rights of affected natural persons and make the relevant information available.

We are required to comply with any reporting or notification obligations towards the competent supervisory authority or affected natural persons. We are responsible for handling enquiries by affected natural persons in this context. These enquiries may be addressed to the data protection officer.

## 6 What data protection rights are there?

Affected natural persons have the following data protection rights with regard to their personal data (Arts. 15-21 GDPR):

### 6.1 Right of information

Affected natural persons may demand information from us about whether and to what extent their personal data is being processed (e.g. categories of the processed personal data or the purpose of processing).

### 6.2 Right to rectification, erasure and restriction of processing

Affected natural persons have the right to demand the rectification of inaccurate or incomplete personal data about them without delay. In addition, personal data must be erased if it is no longer required for the purposes for which it was collected or processed, if consent has been withdrawn or the data is being processed unlawfully. Furthermore, affected natural persons have the right to demand a restriction of processing.

### 6.3 Right of withdrawal

Affected natural persons have the right at any time to withdraw their consent to the processing of their personal data for one or more specific purposes if processing is based on their explicit consent. The revocation of consent will only have future effect and does not affect the legality of data processed before the revocation. Furthermore, revocation does not have any effect on data processing conducted on other legal grounds.

### 6.4 Right to data portability

Affected natural persons have the right to receive any personal data about them which has been provided to us. This must be given to them in a structured, standard and machine-readable format. They furthermore have the right to have this data transferred to another controller.

### 6.5 Right to lodge a complaint

Affected natural persons have the right to lodge a complaint with the competent supervisory authority<sup>1</sup>.

The contact details for the competent data protection office in Liechtenstein are:

Data Protection Office Liechtenstein  
Städtle 38  
P.O. Box  
9490 Vaduz  
Liechtenstein  
Phone: +423 236 60 90  
E-mail: info.dss@llv.li

## 7 Right to object

### 7.1 In individual cases

If personal data is processed in the public interest or to safeguard the legitimate interests of LGT or a third party, affected natural persons have the right to object to such processing at any time on grounds relating to their particular situation.

### 7.2 Direct marketing

Affected natural persons have the right to object informally to the use of their personal data for direct marketing purposes. In the event of objection to this type of processing, we no longer process the relevant personal data for this purpose.

Requests should ideally be made in writing to the data protection officer, who is also the point of contact for all other data protection-related issues.

We reserve the right to modify this data privacy notice and publish it on our website (see the update date at the top of this data privacy notice).

<sup>1</sup> You may also contact another supervisory authority of an EU or EEA Member State, for example in your place or residence or work or at the location of a violation of the data protection directive.