

## SATC Privacy Notice

This privacy notice (**Privacy Notice**) informs our website visitors as well as our current and prospective members and business partners (or persons acting on behalf of such party) (**you**) about how the Swiss Association of Trust Companies (**we**) treats personal data (**Data**) in accordance with the Swiss Federal Act on Data Protection (**FADP**) when you visit our website and communicate with us, in connection with memberships and business relationships and in any of the other situations set out in Section 3 below.

### 1. **Controller and Contact Details**

Controller is the Swiss Association of Trust Companies, Neugasse 12, 6300 Zug (email : [info@satc.ch](mailto:info@satc.ch) and phone number : 041 727 05 25).

### 2. **Your Sharing of Third-Party Data**

If you share with us Data regarding any other individual (e.g. shareholders, ultimate beneficial owners, auditors, directors, colleagues, employees, etc.), we assume that this Data is correct. By sharing such Data with us, you confirm that you are authorized to do so and that you have informed the affected individuals about this Privacy Notice and our processing of their Data.

### 3. **Processed Data and Purpose**

#### 3.1 **Website Use**

The processing related to your use of our website is limited to Data that is required to operate, provide and secure the website and the services provided thereon (**Website Use Data**) and for web analysis purposes (**Website Analysis Data**).

Categories of Data: When accessing our website, the following information about your access and device may be collected automatically: IP address, operating system, type of device, browser name and version, date and time of access, address of the website from which you were redirected to our website (if applicable), login credentials, etc. We may analyze your use of our website with web analysis tools, including Google Analytics. Further information on the use of data by Google and configuration options can be found here: <https://www.google.com/intl/en/policies/privacy/partners>.

Purpose: The processing regarding website use is carried out to operate and secure our website and our services, in particular for security reasons to ensure the stability and integrity of our systems. In addition, we may perform basic web analysis to optimize the website regarding usability and to gain insights about the use of our website and services. The collected data will not be merged with other personal data or disclosed to third parties.

#### 3.2 **Cookies**

Website Analysis Data may also be collected via the use of cookies. Cookies are small files that are managed by your browser and are directly stored on your device whenever you visit our website. You can disable the use of cookies in the preferences of your browser, but this might result in some functions of our website or some services being unavailable to you or not functioning properly anymore.

Categories of Data: Website Use Data and Website Analysis Data.

Purpose: We may use cookies on our website to ensure a user-friendly website visitor experience (e.g. session cookies).

#### 3.3 **Communication**

We may be in contact with you by use of different channels (including social media), e.g. if you send us e-mails or messages by using other electronic (or hardcopy) communication means, whereby Data may be exchanged (collectively **Communication Data**).

Categories of Data: If you send us an e-mail or another form of electronic message (or a hardcopy message, e.g. a letter), we may collect such information as your name, e-mail address (or other form of communication identifier, e.g. messenger nickname), phone number, subject matter, message content, related metadata and any other information you choose to disclose in your communication to us.

Purpose: We use Communication Data to process your inquiry and any possible further questions and matters based on the content of your communication with us. We may keep this data to document our communication with you, for training purposes, for quality assurance and for follow-up inquiries.

### 3.4 News

We may process your Data to provide you with news and other types of updates (collectively **News Data**).

Categories of Data: News Data may in particular include your contact information (e.g. name, company type and name, business function / title, e-mail address, etc.) and further data categories such as your preferences (e.g. your areas of interest), your use of our news and updates as well as Communication Data.

Purpose: We process News Data to inform you about topics related to trust law, political developments, events, etc., e.g. in the form of mailings or other regular contacts either in person, via e-mail or other electronic form, by phone or any other communication channel for which we have contact information from you.

### 3.5 Events

We may process your Data for organizing and hosting events (collectively **Event Data**).

Categories of Data: Event Data may in particular include your contact information (e.g. name, company type and name, business function / title, e-mail address, etc.) and further data categories such as your preferences (e.g. your areas of interest) and information relating to specific events (e.g. your registration, participation, etc.), including photos taken at such events.

Purpose: We process Event Data to organize and host events that might be of interest to you and to provide information about past events.

### 3.6 Membership

We may process your Data in relation to memberships with us, namely if you are acting on behalf of a member (collectively **Membership Data**).

Categories of Data: In connection with (current and prospective) memberships, we may collect and further process Data, such as your name, contact details, nationality, place and date of birth, identification documents (e.g. passport), residence and work permit, activity rate, title, professional role and function, educational background, professional experience and qualifications, work history, references (e.g. from other members, law firms, banks, other professionals, etc.), information related to debt collection, criminal record, affiliation to a Swiss social insurance administration office, information related to other memberships of the relevant member (including with an SRO or supervision by the FINMA), adherence to AML/KYC requirements and procedures, information related to regulatory proceedings, signatory power, information related to trust licenses, insurance coverage, payment details, type and number of trusts administered/managed, activity in other business areas, share and beneficial ownership, any further information that is relevant in relation to the membership (including for background checks).

Purpose: In general, Membership Data is used to manage and administer existing memberships and to review applications for future memberships, including to conclude and perform related contracts. We also process Membership Data to comply with the applicable legal requirements and our internal regulations, including compliance with anti-money laundering and fraud prevention obligations. Furthermore, we may process Membership Data for documenting the fulfillment of our obligations and our communication with you, for training purposes and for quality assurance.

### 3.7 Business Partners

We may process your Data if you are a business partner of ours (e.g. a personal affiliate, consultant or auditor) or acting on behalf of such a business partner (collectively **Business Partner Data**).

Categories of Data: In connection with (current and prospective) business relationships, we may collect and further process Data, such as your name, contact details, title, professional role and function as well as any further information that is relevant in relation to the corresponding business relationship.

Purpose: In general, Business Partner Data is used to manage and administer business relationships, including to conclude and perform related contracts. We also process Business Partner Data to comply with the applicable legal requirements and our internal regulations. Furthermore, we may process Business Partner Data for documenting the fulfillment of our obligations and our communication with you, for training purposes and for quality assurance.

## 4. Categories of Recipients

We may disclose your Data to the following categories of recipients (in compliance with the applicable legal requirements):

- a) member(s) on whose behalf you are acting;
- b) other members (including their representatives) in connection with annual general meetings, events, etc. (such disclosure is limited to certain information, such as your name, title and function);

- c) business partners on whose behalf you act;
- d) external service providers (e.g. IT, website and communication services providers, administrative services providers, financial institutions, etc.);
- e) legal and other professional advisors, including personal affiliates, consultants, accountants and auditors;
- f) competent authorities, including supervisory, tax, debt collection and bankruptcy authorities, courts or arbitral tribunals (namely if we are legally obliged or entitled to such disclosure or if it appears necessary to protect our interests).

## 5. Storage Periods and Erasure

We process and retain Data for as long as our processing purposes, the legal retention periods and our legitimate interests (e.g. accounting, quality assurance or the assessment/exercise of, or defense against, legal claims) require it. Except in case of contrary legal or contractual obligations, we will erase or anonymize your Data once the storage or processing period has expired.

## 6. Your Rights as Affected Data Subject

You have the right to request information about your Data we process and further rights regarding such data processing. In particular, you have – or may have, depending on the circumstances – the right to:

- a) **Information**, i.e. to ask us whether we are processing Data about you and, if so, to provide you with further information related thereto.
- b) **Correction**, i.e. to ask us to correct or complement your Data if it is incorrect or incomplete.
- c) **Deletion**, i.e. to delete your Data (to the extent we are not under a legal obligation or have an overriding interest to retain such Data).
- d) **Object**, i.e. to dissent to the processing of your Data. Regarding cookies through which certain Data may be collected, you can block the setting of such cookies at any time by changing the settings in your browser accordingly. A deactivation of cookies may result in a limited user experience and you may not be able to use every function of our website or services or to access the services in an appropriate manner altogether.
- e) **Restrict processing**, i.e. to ask us to temporarily restrict our processing of your Data.
- f) **Data portability**, i.e. to ask us to provide you or another controller in electronic form with the Data you have provided to us (to the extent technically feasible).

In case you wish to exercise any of these rights, please contact us as specified in Section 1. Before responding to your request, we may ask for proof of your identity. This helps us to ensure that your Data is not disclosed to any unauthorized person.

## 7. Data Security

We have put appropriate technical and organizational security policies and procedures in place to protect your Data from loss, misuse and unlawful disclosure, alteration or destruction. Despite these security measures, we cannot completely eliminate the security risks associated with data processing.

## 8. Changes to this Privacy Notice

This Privacy Notice does not form part of any contract with you and we may amend it at any time. The version published on our website is the version that currently applies.

Last update: 20 February 2024