

PRIVACY NOTICE FOR CUSTOMERS, BUSINESS PARTNERS AND INSURED PERSONS

(Version of 1 September 2023)

Integral Stiftung für die berufliche Vorsorge (“**INTEGRAL**”, “**we**” or “**our**”) is responsible for the processing of personal data of its customers and insured persons, as well as business partners and service providers.

Name and contact details of the controller

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In this privacy notice, we explain how we collect and otherwise process personal data from

- insured persons in the compulsory, supplementary and voluntary pension schemes,
- employers, or their contact persons,
- dependants of insured persons (such as spouses, parents, children) and other beneficiaries,
- authorised representatives (such as a legal representatives),
- contact persons of social and private insurers, other pension funds and vested benefit funds, reinsurers, service providers and business partners as well as authorities and offices,
- members of our bodies, and
- tenants of our properties.

This is not an exhaustive description; other privacy notices or general terms and conditions may regulate specific matters. Personal data means all information relating to an identified or identifiable natural person.

If you provide us with personal data of other persons (in particular employees/insured persons), please ensure that these persons are aware of this privacy notice and only share their personal data with us if you are allowed to do so and if this personal data is correct.

This privacy notice is designed to meet the requirements of the Swiss Data Protection Act (“**FADP**”). It explains how we handle personal data that has already been collected as well as future personal data.

We may update this privacy notice from time to time to respond to changing legal, regulatory or operational requirements. We will notify you of any such changes, including their date of entry into effect, for example by publishing them on our website.

For more information on how we use your personal data, please refer to our pension regulations, separate forms and, if you visit our website or use our app, the respective privacy notices.

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1. What personal data do we process?

Within the scope of the occupational pension scheme, we usually collect personal data from the employer of the insured person, e.g. when it registers you with us as a new employee, when it notifies us of a resignation, a salary adjustment or another change of your situation, or when it reports a claim, but also directly from you, e.g. if you wish to join us as a self-employed person, provide us with health details, notify us of a beneficiary or a civil partnership, get divorced, buy into the pension fund or wish to withdraw your termination vested benefit, for example to purchase residential property, transfer your vested benefit to another pension or vested benefits institution in the event of job change, or if you communicate with us in any other way. However, we may also obtain data from publicly accessible sources (such as the Internet, the debt enforcement register or commercial register, or the Central Compensation Office) if permitted by law.

We process in particular the following categories of data, although this list is not exhaustive. In connection with the mandatory occupational pension scheme, we only process insured persons' data within the scope of the Federal Law on Occupational Retirement, otherwise with your express consent or insofar as we have an overriding interest in the data processing:

- **Identification and contact data** such as first name, last name, business and/or private email address and/or postal address, landline and/or mobile phone number. We process this data together with the contractual data for the purpose of handling our contractual and other business relationships, for example if you are an insured person or a relative or beneficiary of an insured person, if you are a contact person of the employer, another pension fund or a service provider, or because we want to contact you in another capacity for our own purposes or the purposes of a contractual partner.
- **Insured persons' data, in addition to identification and contact data** such as date of birth, nationality, marital status, registered partnership, date of marriage and divorce, names and dates of birth of partners and children, gender, information from identification documents (passport, ID), national insurance number (AHV number), contract, policy and insurance number, information on previous pension or vested benefits institutions, occupation, function, date of employment and termination, salary information, degree of fitness for work, degree of employment, limitation of the term of employment, if applicable, information on the reported and insured annual salary and the annual salary within the scope of the Federal Law on

Occupational Retirement, information on insured benefits, bank details, ownership, pledges, early withdrawals and voluntary contributions, information on divorce, 3rd pillar and vested benefits.

- **Data on contact persons at employers and contractual partners (legal entities), such as name and address, contract, pension case and benefit data such as**
 - data in connection with a possible or actual affiliation contract or its termination, a contract settlement and the inclusion of insured persons in the occupational pension scheme;
 - data related to complaints and contract adjustments, or customer satisfaction through surveys;
 - data in connection with the processing of pension cases (retirement, disability, death) and in connection with other benefits, such as transfers, termination benefits, encouragement of home ownership or voluntary contributions to the pension fund;
 - data in connection with claims, such as information on the reason for a payment, information on the private account or the vested benefits institution; if applicable, the consent of the partner and the certification of the signature; in the event of a divorce, information on pension equalisation. We receive this information from the insured person, his/her spouse, partner, authorities and courts;
 - if necessary, also health data and information about third parties, for example concerning the occurrence of incapacity for work, disability or the death of an insured person. We may also receive this data from third parties, such as authorities or offices (social insurers or social welfare offices), employers, other insurers, medical service providers and experts, courts or lawyers.

- **Data from tenants of our properties**

If you are a tenant of one of our properties, your details will be collected and processed by our property management company in accordance with its privacy policy. The property management company provides us with individual information such as your name, address, the size of the apartment, the rent, the status of the rental agreement, and the service charge statement. We process this data solely for the purpose of calculating returns, processing service charges, and for anonymous reporting to the Board of Trustees of the Integral Stiftung.

- **Financial or payment data** such as bank account data, dates and amounts of payments made or received, employer bonus benefits, salary, voluntary contributions to the pension fund, payment of termination vested benefits and pensions. In this context, we also process financial data of beneficiaries, for example in connection with surviving spouses, partners, children and other beneficiaries. We receive this data from the insured person, for example in the context of voluntary contributions or payments of termination vested benefits, but also from publicly accessible sources.

- **Communication data** we receive via contact form, use of our website, email, telephone, traditional mail or other communication channels. In this context, we collect the data provided to us, including your contact details such as name, first name, title, position, name of the company you work for, company website, job title and description, department and marginal data of the communication. If we record telephone conversations, we will inform you accordingly. If we need or want to establish your identity, for example in the case of a request for information, we collect data to identify you, such as a copy of an ID card.

- **Sensitive personal data** such as health-related data (illness, accident, disability, information from the health declaration for the supplementary pension scheme), are only collected and further processed on the basis of a legal justification or your express consent and to the extent necessary for the legitimate business purpose.
- **Other data**, for example in connection with official and judicial proceedings; photos, videos and sound recordings, registration data, etc.

2. For what purposes do we process your personal data?

INTEGRAL collects and processes personal data about you depending on the relationship you have with us. Unless the processing of your personal data is required or permitted by applicable law, for example for the purpose of administrating the occupational benefit scheme, or you have given your express consent, INTEGRAL may only process your personal data to the extent necessary to fulfil the contract with you, to comply with a legal obligation or to protect its legitimate business interests:

Administration of the occupational benefit scheme

We process personal data to the extent necessary for the administration of the occupational benefit scheme, in the compulsory and supplementary area, for example for the processing of affiliation contracts with employers and self-employed persons, the admission of insured persons, for the examination and processing of claims, for coordination with other insurers, such as disability insurance and accident insurance, enforcement of recourse claims, or for advisory purposes. In the area of the compulsory pension scheme, this data processing is governed by the Federal Law on Occupational Retirement and the Vested Benefits Act and the associated ordinances. As a federal body, we process your personal data in this area based on Art. 85a ff of the Federal Law on Occupational Retirement.

Customer relationship

We process personal data to the extent necessary to enter into or perform a contract with you or the company you work for, or to take action at your request before entering into a contract with you or the company you work for, including but not limited to:

- the development and management of our professional relationship with you (e.g. by storing your data in our databases);
- managing, planning and carrying out communication and interaction with you (e.g. by running a database that keeps records of interactions with you);
- answering your queries and supporting you efficiently;
- notifying you of changes to this privacy notice in accordance with applicable data protection laws and regulations;
- the provision of pension scheme services;
- billing and invoicing;
- pre-contractual measures at your request.

Marketing activities

On the basis of our legitimate interest or, if you are an interested party, your express consent, we process personal data insofar as this is necessary for the implementation of marketing measures, in particular

- to communicate, to conduct customer surveys on new products or services, to manage events and invite you to events, to categorise your potential interests in INTEGRAL products and services for tailored marketing;

- subject to your express consent, your email address for electronic direct marketing purposes and tracking technologies via our marketing management system to monitor user behaviour.

Ensuring compliance with applicable laws and regulations

We process the personal data collected to the extent necessary to comply with applicable laws and regulations, in particular for

- safeguarding our commercial interests and ensuring compliance and reporting, e.g. compliance with our policies and legal and regulatory requirements, including anti-money laundering, anti-bribery and anti-corruption laws and regulations, tax deductions, handling cases of suspected misconduct or fraud, misuse of IT systems, physical security, IT and network security, internal investigations, audits and litigation defence;
- complying with legal process or governmental orders if we believe we are legally required to do so and if disclosure of your personal information is necessary to comply with those legal obligations, process or governmental orders;
- the pursuit of legal claims and remedies, the defence of legal disputes and the handling of internal complaints or claims;
- archiving, recording and reporting purposes.

Fulfilment of other legitimate business purposes

We process the personal data collected insofar as this is necessary for our legitimate interest to fulfil other business purposes, in particular for

- developing our products and services;
- market research to improve our services, operations and product development;
- carrying out analyses;
- managing our IT resources, including infrastructure management and business continuity;
- managing mergers and acquisitions involving our company;
- calculation of returns on our properties, service charge statements and anonymous reporting to the Board of Trustees of the Integral Stiftung.

3. What applies to profiling and automated individual decisions?

We may process and evaluate your data in an automated, i.e. computer-assisted manner for the purposes stated in section 2 and thereby, for example, determine security risks, carry out statistical evaluations, analyses and calculations. In this context, profiles of insured persons may be created, observing the principle of proportionality.

In order to make our decision-making processes more efficient, certain decisions can also be made in an automated way, i.e. without human intervention. We will inform you in each individual case if an automated decision leads to negative legal consequences or a comparable impairment.

4. Whom do we disclose personal data to?

Various parties are involved in the context of occupational pension provision:

- Employers: They are informed by us when an insured person's data has been modified, insofar as this is relevant for the employment relationship, e.g. change of civil status or gender. Information that does not concern the employer, such as information on voluntary contributions and early withdrawals, is not transmitted.

- Social insurances (disability insurance or social welfare offices), other insurers, reinsurances, medical service providers, experts, banks, lenders, courts and external lawyers: These institutions receive the necessary personal data in connection with the notification and occurrence of an insured event (such as retirement, disability, death) and in connection with other benefits, such as the payment of a termination vested benefit.
- Address check, credit check and debt collection: We may involve third parties for credit checks and debt collection.
- Authorities and agencies: We may disclose personal data to authorities, agencies, courts and other public bodies if we are legally obliged or entitled to do so or if this is necessary to protect our interests.
- Service providers who process personal data on our behalf, for example for IT services, transmission of information, marketing, communication or printing services, facility management, security and cleaning, organisation of events, debt collection, consulting companies, pension fund experts, auditing companies, claims service providers.
- Brokers: We transfer the data required to provide advice, market our products and make offers (in particular contact details and information regarding contracts, pensions and claims). Brokers are legally and contractually obliged to comply with the provisions of the Data Protection Act. Please note that your employer may appoint brokers to handle the contract.

Within INTEGRAL, only those persons have access to your personal data who need to know it in order to perform their professional duties.

While data recipients are contractually obliged to protect the confidentiality and security of your personal data in accordance with applicable laws, your personal data may also be accessed by or transferred to cantonal and/or national supervisory, law enforcement or public authorities or courts if we are obliged to do so under applicable laws or regulations or at their request.

The recipients of personal data are generally located in Switzerland or the EEA (for example in Liechtenstein). If, exceptionally, it is necessary to transfer personal data to a country that does not ensure adequate data protection, including the USA, such transfer will only take place on the basis of sufficient additional guarantees if this is necessary for the performance of the contract or for the establishment, assertion or exercise and enforcement of legal claims or if you have given your express consent to the transfer.

The recipients listed in this privacy notice may in turn involve third parties, so that your data can be made accessible to them. We can only influence the involvement of third parties by our processors (e.g. IT support), but not in the case of authorities, courts or banks.

5. How do we protect your personal data?

We take appropriate technical and organisational measures to protect your personal data from unauthorised access, loss and misuse. These measures include, for example, the issuing of instructions, training, access controls and restrictions, user authentication and the encryption of data carriers and data transfers.

6. How long do we store your personal data?

We store and process your personal data as long as it is necessary for the fulfilment of our contractual and legal obligations or other purposes pursued with the processing, for example for the duration of the

entire business relationship (from the initiation and execution until the termination of a contract) and beyond that in accordance with the statutory retention and documentation obligations. In this context, it is possible that personal data will be retained for the time during which claims can be asserted against INTEGRAL and insofar as we are otherwise legally obliged to do so or justified business interests require this (e.g. for evidence and documentation purposes). As soon as your personal data is no longer required for the above-mentioned purposes, it will be deleted or anonymised as a matter of principle and as far as possible.

7. What are your privacy rights and how can you exercise them?

Under applicable data protection law and under the conditions and within the limits set out in the law (such as for the protection of third parties), you have the right to

- request information from us as to whether and which of your personal data we process;
- require us to correct your personal data if it is inaccurate;
- object to the processing of data and request the restriction or deletion of personal data, unless we are obliged or entitled to continue processing;
- request from us the delivery of certain personal data in a common electronic format or the transfer of your personal data to another controller;
- withdraw your consent, insofar as our data processing is based on your consent; and
- where we inform you of an automated individual decision, express your point of view and request that the decision be reviewed by a natural person.

You may furthermore assert claims in accordance with Art. 32 or 41 FADP.

To exercise your rights, please contact us as described in section 8 below.

8. How can you contact us?

If you have any questions about this privacy notice or wish to exercise your rights, you can contact your INTEGRAL contact person, info@integral.swiss or the data protection advisor (mail@privacylegal.ch).