

Privacy policy as of September 1, 2023

For reasons of better readability, the simultaneous use of the language forms male, female and diverse (m/f/d) is waived. All references to persons apply equally to all genders.

1. General information

In the context of its business activities Swisscanto Flex Collective Foundation (hereinafter Foundation) gathers and processes information about natural and legal persons (“personal data”), including information about our current, former, and prospective policyholders (“you”). The collective foundation takes data protection very seriously and processes personal data in accordance with the principles of the Swiss Data Protection Act (FADP).

This privacy policy sets out how the collective foundation collects and uses the personal data with which you or your employer provides us. It also describes the rights available to you relating to the use of your personal data.

If you have any questions or comments about the management of your personal data, please contact our data protection advisor.

2. Who is the data controller?

For general questions about data protection and the processing of your data, please contact:

Swisscanto Flex Collective Foundation
of the cantonal banks
c/o Pension Fund Services AG
Sägereistrasse 29
8152 Glattbrugg

Data controller of the Foundation is:

Rechtsanwältin Franziska Bur
BaselLegal GmbH
www.basellegal.ch.

3. Which data do we collect?

We process the personal data that we receive from our insured individuals within the scope of our business relationship.

The relevant personal data includes the following:

- Personal details (e.g. name, date of birth, title, employee and social security number)
- Contact details (e.g. home address, email address and phone number)
- Financial information (e.g. payment details and tax information)
- Information within the context of the pension relationship (e.g. salary, employment level, and details on the balance, contributions and benefits)
- Details of benefits from other social insurance schemes (e.g. disability, accident, and daily sickness allowance insurance)
- Sensitive personal data (in particular health data in accordance with Article 5 FADP)

- Personal sphere (e.g. civil status)

The personal data the Foundation processes comes from the following sources:

Insured or pension recipients themselves (e.g. upon the occurrence of a pension event)

Employers (e.g. employees' identification and contact details)

The Foundation itself (e.g. information within the context of the pension relationship)

Third parties (e.g. brokers, notifications from courts, social insurance or other pension schemes)

When you get in touch with us (e.g. through the contact form or by email or phone), we save your information for processing your query in case we have follow-up questions, for quality assurance purposes, or for other purposes described in this policy.

We only store and use these personal details where this is permitted under the law. For exceptional cases, we require specific consent from you. Unless specifically stated otherwise, we only store personal data for as long as it is needed and allowed in order to fulfil the purposes pursued.

4. For what purposes do we process data?

The Foundation processes the personal data listed above for the following purposes:

- To prepare insurance and retirement transactions
- To carry out and manage insurance and pension operations, particularly for evaluating benefit claims and calculating and disbursing old-age, disability and survivor's pensions
- To process services with external parties, specifically social insurance entities (e.g. for coordinating benefits)
- To meet the regulatory requirements on the insurance relationship (e.g. for calculating and certifying pension fund assets)
- For statistical purposes (e.g. for actuarial appraisals, evaluations of obligations and tenders)
- To ensure compliance with legal regulations

5. Disclosing and sharing data with third parties

Personal data may be shared with the following recipients:

- Insured person's employer
- Authorised representatives (e.g. medical examiners, lawyers and surviving descendants)
- Health insurance and accident insurance providers
- Reinsurers
- Pension funds

The Foundation may disclose your data to authorities or public bodies (e.g. social insurance providers, tax authorities, debt enforcement offices, courts, etc.), if this

- complies with the applicable law, regulations, court orders or official requirements;
- meets any requirements from supervisory or other authorities or guidelines issued by them

The data will however be shared only if the sharing or the request for sharing is in compliance with the Foundation guidelines or currently applicable law.

6. Data retention period

The Foundation manages and retains personal data for as long as necessary to comply with contractual and legal obligations. The statutory retention period is typically ten years following the termination of the obligation to provide services or the transfer of the exit benefit, although longer deadlines may be possible in specific cases.

If the personal data is no longer needed to meet contractual or legal obligations, it will typically be deleted, unless further processing of the data is necessary in the overriding interests of the Foundation. For more detailed information about retention periods, please contact our data protection advisor.

The obligation to delete information does not apply if this data is needed by the Foundation to assert or defend its own rights and claims; in this case, the Foundation may retain copies of this data, while observing all security regulations and upholding the principles of lawful data processing, to the extent, duration, and for the purposes necessary for asserting/defending its rights and claims.

7. Protecting, processing and using personal data

We grant access to your personal data solely to those employees, representatives and other parties who need to be aware of that data in order to provide you with services and assistance. We have implemented appropriate technical and organisational security measures to protect your personal data. We use a range of measures, including firewalls, personal passwords and encryption and authentication technologies, to achieve this. Your data will be used and disclosed strictly in accordance with this privacy policy, except in cases where we have your consent or when disclosure is legally permitted.

8. What are your rights?

You have the right to

- be informed
- rectify your data
- have your data deleted
- restrict the processing of your data
- object
- the portability

of the data we have collected about you. Please contact our data protection advisor in such cases.

9. Responsible data protection authority

You can always contact a supervisory authority if you wish to lodge a complaint. The Federal Data Protection and Information Commissioner (FDPIC) is the data protection and freedom of information commissioner for Switzerland, based in Bern.

10. Amendments

We reserve the right to amend this privacy policy at any time without prior notice. The currently valid version is the version currently published on our website.