



LGT Group Holding Ltd.
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Data privacy notice for natural persons EU General Data Protection Regulation (GDPR) and Data Protection Act (DSG)

Applicable to board membership mandates, advisory mandates or other mandates

Valid from December 2019

This data privacy notice is intended to provide you with an overview of the processing of the personal data held at LGT in conjunction with your board membership mandate or advisory mandate or another mandate on behalf of one or more LGT Group companies (hereinafter referred to as the "Mandate") as well as your resulting rights under the provisions of the GDPR.

Should you have any questions about particular data processing or want to exercise your rights, please contact:

Contact details of the data protection officer:
LGT Group Holding Ltd.
Data Protection Officer
Herrengasse 12
9490 Vaduz
Liechtenstein
Phone: +423 235 11 22
E-mail: lgt.datenschutz@lgt.com

Controller:
LGT Group Holding Ltd.
Group Human Resources
Herrengasse 12
9490 Vaduz
Liechtenstein
Phone: +423 235 11 22
E-mail: info@lgt.com

1 From which sources do the data originate (source) and which data are processed (categories of data)?

We process personal data that we have received from you within the context of establishing, implementing and terminating your Mandate and for the purposes of complying with the related statutory or contractual obligations. As well as the data that you provide, we also process data generated during the course of your Mandate (e.g. compensation payments).

If services are provided which go above and beyond the specific purposes of processing in order to establish, implement or terminate your Mandate, we may need to collect additional personal data or consult data received from third parties. Personal data deemed relevant in this context include information on creditworthiness, data to be processed by law, data in the context of court measures or M&A activities.

We also process, if applicable, personal data from people with close links to you (e.g. family members) in order to provide services or satisfy claims. We request that you also inform these people of 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)
- Authentication data (e.g. signature sample)
- Data from public sources and registers (e.g. confirmation of residence, commercial register)
- Details of the person and family (e.g. age, gender, marital status, hobbies)
- Information on education and professional background (e.g. CV, professional qualifications, professional experience, professional licences, testimonials)
- Information on the Mandate (e.g. appointment and dismissal or resignation date, role, assessments, career details, professional development)

- Information on financial, social security and tax characteristics (e.g. financial circumstances, creditworthiness, bank account details, tax number)
- Compensation and concessions (e.g. fees, reimbursed expenses)
- Information on yourself and your health (e.g. personal characteristics)
- Information on memberships and mandates (e.g. lectureships, other activities and mandates)
- Information on composition of household and relationships (e.g. information on family, representatives, partners)
- Court, official and administrative measures (e.g. extract from the criminal or debt collection register)
- 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, images)

2 For what purposes and on what legal basis are your data processed?

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

- For the performance of a contract (Art. 6 (1) letter b GDPR) as part of establishing, implementing or terminating a Mandate.
- For compliance with a legal obligation (Art. 6 (1) letter c GDPR) or in the public interest (Art. 6 (1) letter e GDPR), in particular to adhere to regulatory requirements (e.g. "fit and proper" test) or recording and archiving obligations (e.g. maintaining files), as part of compliance obligations (e.g. transaction monitoring), security requirements (e.g. security checks), fee payments, compliance with notification and reporting requirements insofar as is required under the law or contractual obligations in each case, paying duties and taxes, enforcing the law and data protection obligations. When processing data on the basis of complying with a legal obligation, we are guided by the statutory requirements.
- For the purposes of the legitimate interests pursued by us or by a third party (Art. 6 (1) letter f GDPR) for specifically defined purposes, in particular to avoid conflicts of interest (e.g. relating to PEPs), as part of Group-wide collaboration (e.g. publication of selected data on the Intranet and in HR tools, publication of internal communications) and LGT's business activities (e.g. passing on contact details to business partners, suppliers and clients), for compliance with the rights of the data subject (e.g. right of information), for recording presence, for the prevention and solution of criminal offences (e.g. personal security check for defined roles and responsibilities), as part of video surveillance (e.g. protecting against theft, fraud), compliance activities (e.g. telephone call recordings, chat records for defined roles, time logging), for ensuring IT security and IT operation as well as building and equipment security (e.g. access control, including photos, access badges, preventing unauthorised access), for assessing legal claims, enforcing the law and/or defending against legal action, for managing risk, for reporting, for statistical and planning purposes, for performing Group-wide coordination tasks.
- On the basis of your consent (Art. 6 (1) letter a GDPR), if you have given us consent to process personal data for certain purposes.

We reserve the right to further process personal data that have been collected for one of the above purposes for the other purposes too if this is consistent with the original purpose or permitted or provided for by law (e.g. reporting obligations).

3 Who obtains access to personal data and how long are they stored for?

The internal and external bodies which require the data for complying with our contractual and statutory obligations receive access to your personal data. These recipients may also receive access to personal data that we process for the purposes of legitimate interests. Relevant recipients include:

- Internal offices at LGT (e.g. management, offices entrusted with HR administration or HR management)
- Agents, service providers (e.g. travel agencies, airlines), speakers, trainers and coaches, business partners, suppliers, clients, companies, authorities (e.g. supervisory and tax authorities), insurance companies, auditors, consulting firms or potential investors
- Other bodies for which you have given us your consent to transfer data.

Data are only transferred to countries outside the European Union (EU) or European Economic Area (EEA) (so-called third countries) provided that this is necessary for the implementation of pre-contractual measures, for the performance of a contract, for the provision of services or for the fulfilment of claims, that you have given us your explicit consent, that it is necessary for important reasons of public interest (e.g. for criminal law matters) or is required by law (e.g. reporting obligations). We will inform you of the details separately if required by law. Processors in third countries are obliged to protect the data.

You can find out from our data protection officer to which recipients and/or recipient categories your personal data have been transferred.

We process and store the personal data for the duration of a Mandate or entitlement to a claim or as agreed, provided certain data are not subject to shorter, mandatory deletion periods. In addition, the storage period is determined according to the necessity and purpose of the respective data processing. If the data are 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 are deleted periodically, unless further processing or storage is necessary on the basis of contractual or statutory retention periods and obligations of documentation or on the grounds of preserving evidence for the duration of the applicable statute of limitations.

4 Is automated decision-making, including profiling, carried out?

No automated decision-making is used to establish, implement or terminate your Mandate. However, some of your data are processed automatically with the aim of assessing certain personal aspects (profiling). These may include aspects regarding your services, reliability and conduct during the Mandate.

5 What data protection rights do you have?

You have the following data protection rights with regard to your personal data (Art. 15 to 21 GDPR):

5.1 Right of access

You may obtain information as to whether and to what extent personal data concerning you are being processed.

5.2 Right to rectification, erasure and restriction of processing

You have the right to obtain without undue delay the rectification of inaccurate or incomplete personal data concerning you. In addition, your personal data must be erased if these data are no longer necessary in relation to the purposes for which they were collected or processed, you have withdrawn your consent or these data are being unlawfully processed. Furthermore, you have the right to obtain restriction of processing.

5.3 Right of withdrawal

You have the right to withdraw your consent for the processing of your personal data for one or more specific purposes at any time if processing is based on your explicit consent. The withdrawal of consent applies only to the future and does not affect the lawfulness of data processing conducted before the withdrawal of consent. Furthermore, withdrawal does not have any effect on data processing conducted on other legal grounds.

5.4 Right to data portability

You have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and to have those data transmitted to another controller.

5.5 Right to lodge a complaint

You have the right to lodge a complaint with the competent supervisory authority. You may also contact another supervisory authority of an EU or EEA member state, for example in your habitual residence, place of work or the place of an infringement of the GDPR.

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

6 Right to object

6.1 In individual cases

If the processing of your personal data is carried out in the public interest or to safeguard the legitimate interests of LGT or a third party, you have the right to object, on grounds relating to your particular situation, at any time to this processing.

6.2 Direct marketing

You have the right to object informally to the use of your personal data for direct marketing purposes at any time. Where you object to this type of processing, we shall no longer process your personal data for such purposes.

Requests should ideally be made in writing to the data protection officer, who is also the point of contact for any other data protection issues you may have.

We reserve the right to modify this data privacy notice and publish it online or in another suitable form.