

Data privacy notice for natural persons EU General Data Protection Regulation (GDPR) and Data Protection Act (DPA)

With regard to digital client onboarding

Valid from September 2023

This data privacy notice is intended to provide you with an overview of the processing of personal data held at LGT and the resulting rights under the provisions of the GDPR and the relevant local law, as well as which data are processed specifically and the way in which they are used within digital client onboarding. Digital client onboarding is a contemporary alternative to the existing personal onboarding process. We are committed to protecting your privacy and to a duty of confidentiality, and for this reason we implement a number of technical and organisational data protection policies in relation to the processing of personal data.

Within the context of our business relationships, we are reliant upon compiling and processing personal data that are required for opening and implementing the business relationship and for complying with the related statutory or contractual obligations. Without these data we are generally not in a position to enter into a business relationship.

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

Should you have any questions or want to exercise your rights, please contact our 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

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

We process personal data that we obtain within the context of the digital onboarding process. Insofar as is necessary for the provision of a service, we also process personal data that are generated or transmitted as a result of the use of this service.

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)
- Technical data and information about electronic communication with LGT (e.g. access or change logs)
- Image and audio data (e.g. photo, video)
- Biometric data (e.g. facial recognition, liveness check)

2 For what purposes and on what legal bases are your 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 performance of a contract or implementation of pre-contractual measures (Art. 6(1)(b) GDPR)* within the context of verifying the identity of a user, providing access to the onboarding platform, the use of applications for internal and external communications in

connection with client relationships (via audio, video, screen sharing, chat features). The purposes for data processing are primarily determined by the specific service.

We reserve the right to further process personal data that have been collected for one of the above purposes for 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 for how long are they stored?

Bodies both within and outside LGT may obtain access to personal data. Within LGT bodies or employees may process your data only if they require them to comply with our contractual, statutory or supervisory obligations and to protect legitimate interests.

We process and store the personal data throughout the duration of the business relationship provided certain data are not subject to shorter, mandatory deletion periods. 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 or those of third parties (achievement of the purpose) or if granted consent is withdrawn, the data are erased 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.

To be able to offer digital client onboarding we depend on third-party providers. For authentication of identification documents no personal data are sent to or accessed by the third-party provider and/or its affiliates. For the liveness check biometric data are gathered and processed through the third-party provider. The third-party provider stores the data within the European Economic Area (EEA). The liveness check has generally a retention period of 30 days and the stored metadata, which include no client identification data, are deleted after 12 months at the latest.

4 Are automated decision-making (including profiling) and data analyses carried out?

4.1 Automated decision-making

As a basic principle, our decisions are not based solely on automated processing of personal data. We use automated processes for the liveness check during the digital client onboarding process.

4.2 Data analyses

Personal data (including data of involved persons) and publicly available data are analysed and evaluated (including profiling) in order to identify significant personal characteristics of the client. These analyses will be used to identify the client during the onboarding process.

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 from us 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 to revoke

You have the right to revoke your consent to the processing of your personal data for one or more specific purposes at any time if the processing is based on your explicit consent. The revocation of consent will only have future effect and does not affect the legality of data processed before the revocation. The revocation also does not have any effect on data processing with another legal basis.

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 (e.g. another bank).

5.5 Right to lodge a complaint

You have the right to lodge a complaint with the competent supervisory authority.

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 our legitimate interests or those of a third party, you have the right to object, on grounds relating to your particular situation, at any time to this processing.

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 on our website (see the update date at the top of the data privacy notice).