

## **Data privacy policy**

**1 September 2023**

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## **1 General**

### **1.1 Background**

Prevanto offers services in the field of pension fund management, consulting and brokerage. To provide customised solutions and engage in correspondence, it is essential that customer data are processed. Prevanto ascribes major importance to data protection. In this data privacy policy we explain how and for what purpose personal data are collected and processed in connection with the implementation of occupational benefits insurance, the provision of the related services and other activities, both online and offline, to whom personal data are forwarded, and the rights granted in this regard by the laws on data protection.

Prevanto undertakes to handle personal data in a responsible manner. It is therefore natural for Prevanto to comply with the Federal Act on Occupational Retirement, Survivors' and Disability Pension Plans (BVG), the Federal Act on Vesting in Pension Plans (FZG), the Federal Act on Data Protection (FADP), as well as all related ordinances and any other Swiss data protection provisions that may be applicable.

Prevanto points out that this data privacy policy does not provide an exhaustive description of its data processing activities and that some issues may be governed in whole or in part by specific data privacy policies, regulations, contracts, powers of attorney, fact sheets or similar documents.

### **1.2 General contact details**

For concerns related to data protection or questions concerning the provision of our services or this data privacy policy, please contact:

Stephan Wyss (partner)  
Prevanto Ltd  
Seefeldstrasse 7  
CH-8008 Zurich  
Tel. +41 44 366 80 10  
E-mail: [stephan.wyss@prevanto.ch](mailto:stephan.wyss@prevanto.ch)

## **2 Data protection**

### **2.1 General**

Prevanto processes personal data regardless of the manner in which someone establishes contact with us (e.g. by telephone, on a portal, via a social network, at an event, etc.). This concerns personal data in particular which Prevanto receives or provides in the context of its activities relating to mandatory, extra-mandatory or voluntary pension provision offered to insured persons and their dependants or other people involved in its business activities.

This could include, for example, data regarding spouses, life partners, parents and children as well as other beneficiaries. The data can be requested from or provided by authorised persons such as legal representatives, government authorities and other third parties (medical examiners, social and private insurers, other pension schemes and vested benefits institutions, suppliers and partners).

### **2.2 Data processed**

The principal data includes:

- Customer addresses and contact information;
- Written communication with customers and memos of meetings;
- Invoices;
- Contact and identification data (e.g. address, data delivered via the Central Compensation Office ZAS);
- Personal information (e.g. name, date of death, gender, language and marital status);
- Data regarding personal relationships (e.g. beneficiaries and children)
- Special categories of data (e.g. health data)
- Employment data (e.g. starting and leaving dates and percentage of working hours)
- Financial data (e.g. annual salary, bonus and pensions).

### **2.3 Lawful basis for processing**

The lawful basis for the processing of personal data in the field of occupational benefits insurance is provided by the Federal Act

- on Occupational Retirement, Survivors' and Disability Pension Plans (BVG);
- on Vesting in Pension Plans (FZG);

and their related ordinances. As a federal body, personal data are processed in compliance with the powers of processing accorded by law (e.g. Art. 85a et seq. BVG).

## 2.4 Forwarding of personal data to third parties

Where personal data are not processed by Prevanto but rather by order processors or other controllers, Prevanto ensures that the legal requirements are met. Data are generally only forwarded to third parties if:

- required for the implementation of occupational pension provision;
- forwarding is permitted based on the balancing of interests;
- Prevanto is obliged by law to forward the data; or
- consent has been provided.

Personal data are also forwarded to third parties in the context of our business activities and for the above purposes, to the extent permitted and required, either because they work for Prevanto (order processing) or because they need these data to perform their statutory obligations (disclosure of data). This in particular includes

- employers (affiliated companies; however, no information relating to health, retirement assets or individual transactions such as purchases or advance withdrawals is forwarded);
- other social insurers (e.g. AHV/IV, daily sickness benefits and accident insurance or other pension schemes);
- service providers, including order processors of Prevanto for the processing and storage of data (e.g. IT providers), sending and receiving of e-mails, offering and development of specific functions;
- auditors;
- pension actuaries;
- medical officers, experts and other service providers;
- security funds;
- advisors such as lawyers;
- government authorities (supervisory and tax authorities);
- insurance companies (e.g. for the reinsurance of risks);
- banking institutions and providers of payment services;
- notaries public for advance withdrawals under the promotion of the home ownership scheme (WEF), etc.

## **2.5 Place of processing of personal data; disclosure of personal data abroad**

The data received or processed by Prevanto are processed and stored in Switzerland.

When processing is carried out, even partially (subject to written consent given by the other party), outside of Switzerland or the European Economic Area, a suitable level of data protection must be guaranteed.

## **3 Data security**

Prevanto has implemented state-of-the-art technical and organisational measures to protect personal data against access, manipulation, loss, destruction or disclosure to unauthorised persons.

The employees and service companies commissioned by Prevanto have been obligated by us to maintain secrecy and to comply with data protection regulations. Access to personal data is also only granted to the extent required.

## **4 Rights pertaining to personal data**

### **4.1 Duty of information**

Data subjects have the right to

- ask us about their personal data stored by us;
- have inaccurate or incomplete personal data rectified;
- request the deletion or anonymisation of personal data that are not or no longer required for the implementation of occupational pension provision;
- revoke their consent with future effect where processing is based on consent.

### **4.2 Deletion of personal data**

Prevanto is not obliged to delete personal data, provided and to the extent that:

- there is a mandatory legal retention obligation;
- Prevanto requires these data to assert / defend its rights and claims.

## **5 Final provisions**

### **5.1 Amendments to this policy**

This data privacy policy is updated regularly and may be amended at any time.

### **5.2 Approval**

This data privacy policy was approved by the management of Prevanto Ltd and enters into force on 1 September 2023.