

Privacy Statement for Insured Persons

“Pensionskasse Mitarbeitende P-Schweiz” and “Pensionskasse Partner P-Schweiz” are strongly committed to protecting personal data and being transparent about how personal data is processed. Therefore, this Privacy Statement describes why and how we collect and use personal data of all insured persons and provides information about individuals’ rights. Please note that this Privacy Statement serves as a general overview and you might receive additional information where appropriate and needed.

This Privacy Statement applies to all insured persons (hereinafter collectively referred to as “Insured Person(s)” or “you”), whereas “MPS or PPS”, “we” or “us” refers to “Pensionskasse Mitarbeitende P-Schweiz” (MPS) and “Pensionskasse Partner P-Schweiz” (PPS).

Summary of Processing

<i>What?</i>	We process general personal data, financial data, health data and other relevant data to carry out occupational pensions. The data is collected from you directly, from the former pension scheme and/or from your employer. <i>More information below under <u>Relevant Personal Data and its Source</u>.</i>
<i>Why?</i>	Your personal data is first and foremost processed either to carry out mandatory occupational pensions or to perform a contract between your employer and MPS or PPS regarding over-mandatory and voluntary occupational pensions. In addition, we process your personal data to comply with various legal requirements and to safeguard our own legitimate interests. <i>More information below under <u>Purpose and Legal Basis of Processing</u>.</i>
<i>How?</i>	We process your personal data for as long as you are an Insured Person. The processing includes the collection of new personal data, its storage, use, rectification, disclosure or deletion. After this period, we are obliged to keep some of your personal data to meet regulatory and statutory retention obligations. You have several rights under applicable data protection laws such as right of access to, rectification, and under specific circumstances also the erasure of your personal data. <i>More information below under <u>Profiling, Data Storage and Retention and Data Subject's Rights</u>.</i>
<i>Who?</i>	Usually, MPS or PPS is the controller of your personal data. During its processing, we might transfer some of your data to third parties. In such cases, we contractually ensure that it is protected and used by the processor in a permitted manner. <i>More information below under <u>Recipients and Cross-Border Transfer of Personal Data</u>.</i>
<i>Where?</i>	Generally, your data is stored and processed in Switzerland. In specific and limited cases, your data might be processed outside Switzerland incl. such countries not offering an adequate level of data protection. In such cases, we contractually ensure that it is protected and used by the processor in a permitted manner. <i>More information below under <u>Recipients and Cross-Border Transfer of Personal Data</u>.</i>

1. Identity and Contact Details of Controller

In general, for processing of personal data described in this Privacy Statement the **data controller** is the following legal entity.

Pensionskasse Mitarbeitende P-Schweiz, Birchstr. 160, 8050 Zürich

or:

Pensionskasse Partner P-Schweiz, c/o PricewaterhouseCoopers AG, St.Jakobs-Str. 25, 4002 Basel

In case of questions regarding the processing of your personal data or to exercise your data subject rights you may contact the appointed **Data Protection Officer** of the controller via

PricewaterhouseCoopers AG
Birchstrasse 160
8050 Zürich
Mail: ch_ogc_data_protection@pwc.ch
Tel.: +41 (0) 58 792 00 00

2. Relevant Personal Data and its Source

Relevant personal data processed of Insured Persons contains master data (e.g. name, contact details, birthday, gender, marital status, nationality), insurance specific information (e.g. insurance number, policy number, information on prior pension funds and benefit receipts), health information (e.g. degree of incapacity to work, information regarding pre-existing illnesses, disability or accidents, information on specific insured events), information in connection with your employment incl. financial information (e.g. salary, level of employment, entry and exit date, bank account information, job grade, Line of Service) and information on related persons (e.g. relatives and beneficiaries).

Relevant personal data is either collected from you directly or from third parties such as your employer (master data and information in connection with your employment), former pension funds (insurance specific information and financial information), Swiss authorities (such as social security authorities, children and adult protection agency [KESB], disability insurance), debt collection office and courts, banks (in case of pledge and early withdrawal), the re-insurer or the independent medical examiner where and as far as they are legally obliged to provide us with this information

Please note that the data processed can also be about third parties, especially in cases your cohabitee shall be benefitted. Should you provide us with such third-party information, we will assume that you have the right to do so, and that the information is correct. By submitting data about third parties, you confirm this. Therefore, please inform these third parties about the processing of their data by us. You may give them a copy of this Privacy Statement.

3. Purpose and Legal Basis of Processing

We process personal data primarily to provide occupational pension and **comply with our respective legal obligations** and related activities. The processing in connection with occupational pension includes conclusion and management of affiliation contracts with your employer, onboarding of Insured Persons, medical checks by our medical examiner, management of the pension capital accounts and pension plans, bookkeeping, communication with Insured Persons incl. providing advice for plan members, assessments and processing of insured events, administration of withdrawals and offboarding of Insured Persons as well as coordination with other insurers.

In addition, we process your personal data to **comply with various other legal obligations** and in order to prevent and detect violations. This includes, for example, the fulfilment of disclosure,

information or reporting obligations – especially in connection with supervisory obligations and statutory enforcement of the law –, meeting retention and data protection obligations and potentially the support in the prevention, detection and clarification of criminal offenses and other violations. In such cases we are guided by statutory requirements.

Insofar as you have granted consent to the processing of personal data for such specific purposes, the lawfulness of such processing is based on your **consent** (e.g. participation in our alumni network after retirement incl. receipt of respective newsletters). Any consent granted may be revoked at any time. Please be advised that the revocation shall only have effect for the future.

As necessary, we process your data to an extent which goes beyond compliance with legal obligation as such or performance of a contract, to **safeguard our own legitimate interests** or those of third parties. Examples are:

- internal cooperation (e.g., in HC self-service systems such as Workday, publication of internal corporate communication);
- assurance of information security and operation of the IT infrastructure;
- further development of benefits (e.g., adjustment of insurance coverage);
- internal compliance activities as well as prevention and investigation of criminal actions (e.g., pension fraud, conflicts of interest, or the like) incl. handling of reports and conducting internal investigations;
- enforcement of legal entitlements and for defence in legal disputes; or
- risk management.

Whenever we collect or intend to process your data for a purpose not disclosed in this Privacy Statement, we will provide you with all necessary information to the extent you don't have it already.

4. Recipients and Cross-Border Transfer of Personal Data

Access to your data is generally **limited to those needing the data** to perform their contractual and statutory obligations and to safeguard legitimate interests, i.e. the members of the pension fund team based in Switzerland.

In certain cases, especially when you are either an inbound or outbound employee working for another firm of the **PwC network of independent firms**, data about you may be transferred and disclosed to the relevant firm(s). This includes transfer of data to and from your current employer for salary accounting or other network firms for specific and limited purposes for which the relevant PwC firm may use it lawfully. As a result, your data may be transferred and stored outside Switzerland and/or the European Economic Area (EEA) and in countries that do not have laws considered to provide adequate protection for personal data.

We use servers and other resources provided by your employer or other PwC firms in various countries to process your data. It may also be transferred to service providers that aren't members of the PwC network (third party service providers) to process on MPS or PPS' behalf. Third party service providers may especially include providers of IT services, including managing of the technical data and account of the insured person, electronical archive of all relevant documents or the like. In addition, relevant recipients outside PwC include the medical examiner, statutory pension fund experts, our auditor and consultancy companies. Third parties receiving your data are bound to maintain appropriate levels of security and confidentiality and – in case of third-party service providers – to process personal information only as instructed by us.

Finally, we may disclose information about you to law enforcement, tax, regulatory and other **government agencies** and to professional bodies and other third parties such as insurance companies or other pension funds in case of you withdrawing from MPS or PPS, as required by and/or

in accordance with, applicable law or regulation. We may also review and use your information to determine whether disclosure is required or permitted.

We will transfer your information to PwC firms or other third parties outside Switzerland and the EEA only:

- if the recipient is in a country that is recognised as ensuring an adequate level of protection for personal data (see the website of the [Federal Data Protection and Information Commissioner](#) / [European Commission](#) providing a current list of adequate countries).
- under standard data protection clauses or other safeguards meeting the requirements of the Swiss Data Protection Act / European General Data Protection Regulation for transfers of personal data outside Switzerland and/or the EEA.

5. Profiling

As far as it is relevant for your insurance, we process your data in a way that permits an assessment of your health (might be considered profiling resp. personality profile regarding a certain aspect). However, such profiling is always limited to what is required from a legal perspective in connection with carrying out occupational pension funds. This may relate to an insurance reservation or an assessment by the medical examiner.

However, there is no automated decision-making involved in our processes, meaning that you will not be subject to a decision based solely on automated processing which produces legal effects concerning you or similarly significantly affects you.

6. Data Storage and Retention

As necessary, we process your personal data for the duration of the purposes described above. In addition, we are governed by various regulatory and statutory storage and documentation obligations, e.g., in connection with archiving duties (as a rule for up to at least 10 years after you leave MPS orPPS). Please note that some personal data will not be deleted in order for us to be able to demonstrate compliance with our legal obligation (e.g. leaving statement, personal certificate). Any personal data not falling under such retention requirements will be deleted or de-identified as soon as we no longer need them to achieve the stated purposes. Finally, any personal data processed based only on your consent will be deleted or de-identified if such consent is revoked.

7. Data Subject's Rights

In connection with the processing of your personal data you have the right to:

- access your personal data, e.g. receive information about what data we process about you;
- ask that we update the personal data we hold about you, or correct such personal data that you think is incorrect or incomplete;
- ask that we delete personal data that we hold about you, object to the processing or restrict the way in which we use such personal data; data that we must continue to store and/or process for legal reasons remain reserved;
- request a copy or transfer of your data (data portability); and/or
- withdraw your consent to our processing of your personal information (to the extent such processing is based on consent and consent is the only permissible basis for processing).

To exercise any of the abovementioned rights, please contact the Data Protection Officer or, where appropriate, contact your pension fund contact. We recommend you include clear and precise description of your request.

8. Right to Lodge Complaint with Supervisory Authority

In addition to the rights listed above, you have the right to lodge a complaint with the appropriate national supervisory authority.

For Switzerland this is

Eidgenössischer Datenschutz- und Öffentlichkeitsbeauftragter (EDÖB)

Feldegweg 1

3003 Bern

Tel.: +41 (0)58 462 43 95

<https://www.edoeb.admin.ch/edoeb/de/home.html>

For Liechtenstein this is

Datenschutzstelle Fürstentum Liechtenstein

Städtle 38

9490 Vaduz

Tel.: +423 236 60 90

<https://www.datenschutzstelle.li/>

9. Modification to this Privacy Statement

MPSor PPS reserve the right to modify or amend this Privacy Statement at any time by publishing an updated version on Vivid. This Privacy Statement was last updated on 22 August 2023.

10. Privacy Statement from Baloise Insurance (only applicable for PPS)

Our Re-Insurance Partners privacy statement can be found here:

<https://www.baloise.ch/en/about-us/information/privacy-policy/privacy-policy-for-insurance-contracts.html>