

Libera AG Data Privacy Policy

BY LIBERA AG (AS OF 01.09.2023)

1. GENERAL

The website www.libera.ch is the internet presence of Libera AG (hereinafter: Libera). The website is operated by Libera and designed together with various partners. By accessing information, data and documents on the Libera website, you agree to the following conditions.

2. COPYRIGHT

Copyright of Libera AG. All rights reserved. Libera is a protected trademark. All works published on the website, in particular texts, images, graphics, sound, video and animation files as well as their arrangements are subject to copyright law and other laws for the protection of intellectual property. They may not be used on third party websites or stored, processed, reproduced, transmitted or altered for commercial purposes or distribution without the written permission of Libera. Works made available by third parties on websites are subject to their industrial property rights.

3. PRIVACY POLICY

By using our website, you agree to this privacy policy. The protection of your privacy is important to us. We show you below how we handle personal data, use cookies, ensure the security of your data and much more.

3.1 GENERAL

The processing of data collected when visiting Libera's website is carried out in accordance with the Federal Act on Data Protection (FADP).

When you visit this website, various personal data are collected. Personal data such as name, address, e-mail address, telephone number, etc. are processed in particular when you provide them to us by e-mail or telephone, contact form or for an application.

3.2 Contact person

The following company is responsible for processing your personal data when you visit our website:

Libera AG
Birsstrasse 320
P.O. Box
4052 Basel

You can also contact us regarding data protection issues at the following e-mail address:

Libera AG - Vorsorgeexperten
Birsstrasse 320 - P.O. Box - CH-4052 Basel - Phone +41 (0)61 205 74 00 - www.libera.ch
Stockerstrasse 34 - P.O. Box - CH-8022 Zurich - Phone +41 (0)43 817 73 00 - www.libera.ch

datenschutz(at)libera.ch

3.3 Purpose of the collection and processing of personal data

We collect and process your personal data carefully, only for the purposes described in this data protection declaration and only to the extent necessary for this purpose and within the framework of the applicable legal provisions.

We process your personal data primarily for the following purposes:

- to communicate with you;
- to provide a functional website as well as our content and services;
- to analyse your usage behaviour;
- for marketing purposes;
- for the administration and management of our IT resources;
- for other administrative purposes.

3.4 Data transfer, data placement

Your personal data will neither be passed on, nor sold or otherwise transferred to third parties, unless this is necessary for the purpose of processing the contract or for the fulfilment of our legal duties, or unless you have expressly consented to this.

In order to provide our services, we may be dependent on the internal and external transfer of personal data. We therefore also disclose your personal data to trustworthy third parties within the scope of our business activities, insofar as this appears appropriate to us and insofar as it is necessary for the proper processing of contractually agreed business processes. Such third parties are obliged to process your personal data exclusively on our behalf and in accordance with our instructions and to ensure the security of the personal data by means of suitable technical and organisational measures. This applies in particular to the following bodies:

- Libera's external service providers (such as IT service providers, accountants, etc.);
- other business partners;
- customers;
- authorities, official agencies or courts (domestic and foreign);
- acquirers or parties interested in acquiring business units or other parts of Libera;
- other parties in potential or actual legal proceedings;
- other affiliated and related companies of Libera.

You must expect your data to be transferred to countries in Europe and the USA where our service providers are located (e.g. Microsoft). We do not transfer personal data abroad for data processing. However, personal data of cross-border commuters from abroad are processed. This only concerns cross-border commuters from countries whose data protection laws are compatible with Swiss law.

3.5 Data security

We take appropriate technical and organisational security precautions to protect your personal data from unauthorised access and misuse. To ensure the security of your data during transmission, we protect our website with state-of-the-art encryption methods. As complete data security cannot be guaranteed for communication by e-mail, we recommend that you choose a secure form of transmission for confidential information.

3.6 Hosting and log files

When you access this website, information of a general nature is automatically identified. This information is recorded in the server log file and includes the type of web browser, the operating system used, the domain name of your internet service provider and your (IP) address. Our website is hosted by Xeit GmbH. At Xeit, web server log files containing the following information are created by default for each access to the website:

- visited website;
- time at the time of access;
- amount of data sent in bytes;
- source/reference from which you reached the page;
- internet browser used;
- operating system used;
- IP address used.

The data collected is only used for statistical evaluations, to improve the website and to ensure security.

3.7 SSL / TLS encryption

Access to our website is via transport encryption (Transport Layer Security "TLS").

You can recognise such encrypted connections by the prefix "https://" in the page link in the address line of your browser. Unencrypted pages are marked with "http://".

All data that you transmit to this website - for example when making enquiries or logging in - cannot be read by third parties thanks to TLS encryption.

3.8 Contact form and e-mail contact

There is a contact form on our website which can be used for electronic contact. For a certain period of time (each autumn), another contact form is also available for the registration to the Libera Forum. The data transmitted to us using these forms will be stored for as long as is necessary to process the enquiry.

These data are:

- salutation;
- title;

- company;
- first name;
- last name;
- e-mail address;
- telephone number;
- subject;
- message.

The following data is also stored at the time the message is sent:

- the IP address of the user;
- date and time.

The processing of personal data via the input mask or by e-mail is solely for the purpose of processing your contact.

The other personal data processed during transmission serve to prevent misuse and to ensure the security of our information system.

In this context, the data will not be passed on to third parties.

The data is deleted as soon as it is no longer required to achieve the purpose for which it was collected.

3.9 Duration of retention and deletion of personal data

Your data will be stored for as long as it is necessary for the fulfilment of our contractual and legal obligations or otherwise for the purposes pursued with the processing, as well as beyond that in accordance with the statutory retention and documentation obligations.

Data processed by us will be deleted or its processing restricted in accordance with the legally applicable provisions. As soon as personal data is no longer required for its intended purpose and there are no legal retention obligations to the contrary, it will be deleted.

3.10 Data protection provisions for third-party services

Contributions to this website may link to or make use of external services.

3.11 Use of Google Analytics

This website uses Google Analytics, a web analytics service provided by Google (USA). Google Analytics allows us to measure and evaluate the use of the website (not on a personal basis). Cookies are used for this purpose, which are set by the service provider. You can agree to these cookies in the cookie banner or reject them.

The information generated by cookies about the use of this website (including the IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website,

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compiling reports on website activity for website operators and providing other services relating to website activity and internet usage.

Google may transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. However, Google may not associate your IP address with any other data held by Google.

You can prevent cookies from being stored by adjusting the settings in your web browser.

3.12 Privacy policy for the use of LinkedIn

We use LinkedIn for customer retention, acquisition, and advertising purposes. We therefore use plug-ins from this social network on our website. When a page with a LinkedIn plug-in is called up, a connection is established between the browser used and the LinkedIn server. Further information on LinkedIn plug-ins can be found at <https://developer.linkedin.com/plugins>. As part of this process, LinkedIn receives knowledge of which sub-page of our website is visited by the data subject. We have no knowledge of the content of the transmitted data or its use by LinkedIn. The applicable data protection provisions of LinkedIn can be accessed at www.linkedin.com/legal/privacy-policy and the applicable cookie policy at <https://www.linkedin.com/legal/cookie-policy>.

3.13 Newsletter

If you have registered for our newsletter with your e-mail address, we will store and use your e-mail address to send you our newsletter with information and news about Libera AG as well as specialist publications and advertising about us until you have unsubscribed from our newsletter. You can unsubscribe from the newsletter at any time.

3.14 Privacy policy on the use and application of Google Maps

For our contact page, we use the map service Google Maps via an API (programming interface). Google Maps is used in the interest of making it easy to find the places we indicate on the website.

To use the functions of Google Maps, it is necessary to save your IP address. This information is usually transferred to a Google server in the USA and stored there. We have no influence on this data transmission.

3.15 Use of Google reCAPTCHA

We use the reCAPTCHA service of Google Inc. (Google) to protect your enquiries via Internet forms. The query serves to distinguish whether the input is made by a human being or improperly by automated, machine processing. The query includes the sending of the IP address and possibly other data required by Google for the reCAPTCHA service to Google. For this purpose, your input is transmitted to Google

and used there. However, your IP address will be shortened beforehand by Google within member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information to evaluate your use of this service. The IP address transmitted by your browser as part of reCAPTCHA will not be merged with other Google data. The deviating data protection regulations of the Google company apply to this data. You can find further information on Google's data protection guidelines at: <https://policies.google.com/privacy?hl=de>

3.16 Use of Google Tag Manager

We use the Google Tag Manager. The Google Tag Manager is a tool that allows us to integrate tracking or statistical tools and other technologies on our website. The Google Tag Manager itself does not create user profiles, does not store cookies, and does not perform any independent analyses. It only serves to manage and play out the tools integrated via it. However, the Google Tag Manager records your IP address, which may also be transmitted to Google's parent company in the United States. Further information on the Google Tag Manager and its data protection guidelines can be found at: <https://www.google.com/intl/de/tagmanager/use-policy.html>.

3.17 SAFETY

We would like to point out that data transmission on the Internet (e.g. communication by e-mail) can have security gaps. Complete protection of data against access by third parties is not possible. However, the protection of your data is very important to us. We therefore use technical and organisational security measures to protect the stored personal data against accidental or intentional manipulation, loss or destruction and against access by unauthorised persons. Our security measures are continuously reviewed and improved in line with technical progress.

3.18 Data subject rights

Within the framework of the applicable legal provisions, you have the right to information about your stored personal data, its origin and recipients and the purpose of the data processing at any time and, if applicable, a right to correction, prohibition of processing or deletion of this data.

Please note, however, that we reserve the right to assert the restrictions provided for by law. For example, if we are obliged to retain or process certain data, if we have an overriding interest in doing so (insofar as we are entitled to rely on this) or if we need the data to assert claims. If you incur costs, we will inform you in advance.

As a rule, the exercise of the above rights requires that you clearly prove your identity. To exercise your rights, you can contact us in writing at the address given in section 3.2 or by e-mail to [datenschutz\(at\)libera.ch](mailto:datenschutz(at)libera.ch).

Every data subject also has the right to enforce his or her claims in court or to place a complaint with the competent data protection authority. The competent data protection authority in Switzerland is the Federal Data Protection and Information Commissioner (www.edoeb.admin.ch).

4. DATA PROCESSING IN THE APPLICATION PROCESS

Before being hired, an applicant goes through Libera's application process. The applicant is usually first contacted by e-mail with various application documents such as CV, work history and former jobs. Libera stores these documents and forwards them internally to the relevant specialist for assessment. Libera keeps the applicant informed during the application process by e-mail or telephone. Notes from interviews and information exchanged are also stored.

The processing of personal data is carried out within the framework of the fulfilment of our contracts and in part due to legal obligations. In individual cases, Libera expressly asks the persons concerned for their consent to the circulation of their personal data.

Any employee or applicant of Libera or any other person concerned is free to [contact](mailto:datenschutz(at)libera.ch) the data protection advisor via the e-mail address [datenschutz\(at\)libera.ch](mailto:datenschutz(at)libera.ch) in order to assert data subject rights or to clarify data protection issues. Libera retains personal data in accordance with the applicable legal provisions. Data and documents of applicants whose application is not pursued further will be destroyed immediately after rejection.

5. DATA PROCESSING EMPLOYEES, CUSTOMERS, SUPPLIERS, PARTNERS a.o.

Communication and the exchange of information usually takes place via e-mail. Disclosure to trusted third parties only takes place if it is required by law or within the scope of the order. Such third parties are obliged to process your personal data exclusively on our behalf and in accordance with our instructions and to ensure the security of your personal data by means of suitable technical and organisational measures.

Any data subject is free to [contact](mailto:datenschutz(at)libera.ch) the data protection advisor via the e-mail address [datenschutz\(at\)libera.ch](mailto:datenschutz(at)libera.ch) in order to assert data subject rights or to clarify data protection issues. Libera retains personal data in accordance with the applicable legal provisions.

6. REQUEST BY E-MAIL OR TELEPHONE

If you contact us by e-mail or telephone, your enquiry including all resulting personal data (name, enquiry) will be stored and processed by us for the purpose of processing your request. Further details can be found in section 3.8. We do not pass on this data without your consent.

If Libera is contacted by email, this will be taken as consent to respond by email and to continue to communicate electronically, unless explicitly stated otherwise. In these cases, we may additionally use your email address to send you our newsletter as explained in section 3.13.

7. LICENSING RIGHTS

The intellectual property of Libera contained on the website, consisting mainly of copyrights and trademarks, is protected. Use of the website does not grant any licences or other rights to use the intellectual property of Libera or third parties.

8. NO OFFER

Nothing on the Libera website constitutes an offer or solicitation to buy or sell any product or service, such as investment products or investment advisory services. Nor does any information available on Libera's website constitute investment, legal, tax or business advice.

9. FORWARD-LOOKING STATEMENTS

Information on the Libera website may contain statements about future developments. Such statements involve risks and uncertainties. Libera assumes no guarantee for the accuracy of forward-looking statements and is under no obligation to update them.

10. LIABILITY

Any liability of Libera for damages or consequential damages resulting from access to our website or to individual elements of the website or their use (or from the impossibility of access or use) is excluded.

Libera also expressly reserves the right, if security risks are identified, to interrupt access to the website or, in serious cases, to block access until the risks have been eliminated. Any liability on the part of Libera for any damage or consequential damage resulting from the interruption or blocking is excluded.

Libera excludes all liability for third-party websites referred to by links or which contain links to the Libera website. Libera accepts no responsibility for their content and/or up-to-dateness. By activating the link, the visitor leaves the website and these regulations are no longer applicable.

11. RESERVATION OF THE RIGHT TO MAKE CHANGES

Libera reserves the right to adapt this data protection declaration at any time without prior notice (particularly to current legal provisions and changed processes). The current version published on our website shall apply.

12. RELIABILITY OF THE PUBLISHED INFORMATION

Libera takes all reasonable care to ensure that the information on the website is correct and up to date at the time of publication. Nevertheless, neither Libera nor its contractual partners assume any guarantee regarding the topicality, correctness or completeness of the information.

13. Final Provisions

(1) Disputes arising from the use of our website shall be governed exclusively by Swiss law, excluding its conflict of laws provisions. The exclusive place of jurisdiction is the city of Basel.

(2) This version of "Data Privacy Policy" is a translation of the German version of "Datenschutzerklärung". The German version is the binding version. In the event of any discrepancies between the German text and a translation into another language, the German text shall prevail. Any translations of the German version are for the convenience of the parties only and are not binding on the parties.