

Privacy Notice

Introduction

Your personal data is data which by itself, or with other data available to us, can be used to identify you. This Privacy Notice (hereinafter this “**statement**”) sets out how we will use your personal data.

This statement relates to the use of personal data obtained to run our business and provide you with products and services. It covers the processing of personal data whether or not you become a customer and includes any processing of personal data before you apply for a product or service.

Responsible for the processing of your data and data controller

Banco Santander International SA head-quartered in Switzerland and any of its branches or representation offices (which also uses the brand name “**Santander Private Banking**”, together “we”, “us” and “our”), is the data controller.

Postal address: 5-7, rue Ami-Lévrier – Case Postale 1256, 1211 Geneva, Switzerland.

Data Protection Officer (DPO) / Privacy Office Contact: privacy@pbs-santander.com

The types of personal data we collect and use

You are in general under no obligation to provide us with any data. However, if you do not provide the required data, we may not be able to process your corresponding request, get in contact with you or provide the requested products and services to you.

We will collect most of the data during the account application process, but we might complete your data with external sources when required to accomplish with our legal obligations.

The types of personal data will depend on the services we will provide to you and could include:

- Full name and personal details, including a copy of your national identity card or passport and your contact information (e.g. home and business address and address history, email address, home, business and mobile phone numbers). Also can be requested family data (e.g. spouse, partner, children, etc);
- Date of birth and/or age;
- Nationality;
- Gender;
- Financial details (e.g. salary and details of other income, taxes, liabilities and details of accounts held with other providers);
- Records of products and services you have obtained or applied for;
- When using some services like the e-banking or mobile applications, the relevant technology used to access or manage them, (e.g. IP address or internet browser);
- Public available sources like fraud prevention agencies, court records of debt judgments and bankruptcies;
- Information about your family members or social circumstances if relevant to the product or service;
- Education and employment details/employment status if relevant to the product or service;
- Personal data about other named applicants; and
- Contact details and information about your business.
- Voice recording. e.g: call with bankers or assistants..
- Using our video services. You can apply for some of our products and services using a video session from your device. If you use our video services, both the images and the audio will be recorded. You're entitled to record your video session only for your own personal use, and you should avoid sharing any footage with third parties or posting it on any websites. For your own

privacy and protection, please ensure that your location doesn't include items and images that you don't wish to be recorded.

- Video surveillance media, e.g. video surveillance on our premises entrances.
- Online information. If you access our website or applications and the products and services offered, The following types of data may be processed: access date and time, volume and performance of the access, details of your device and/or web browser, language configuration, domain and IP address. See our [Cookies Policy](#)

Monitoring of communications

Subject to applicable laws, we will monitor and record your calls, emails, e-banking, videoconferences and other communications relating to your dealings with us. We will do this for regulatory compliance, self-regulatory practices, crime prevention and detection, to protect the security of our communications systems and procedures and for quality control or in case we need a record of what has been said. We may also monitor activities on your account where necessary for these reasons, and this is justified by our legitimate interests or our legal obligations.

Using your personal data

We will process your personal data:

- As necessary **to perform our contract with you** for the relevant account, product or service:
 - To take steps at your request prior to entering into a contract;
 - To decide whether to enter into a contract;
 - To manage and perform that contract;
 - To keep your records updated;
 - To trace your whereabouts to contact you about your account; and
 - When you request that we disclose your personal data to other people or organizations such as a company handling a claim on your behalf, or otherwise agree to disclosures.
- As necessary **for our own legitimate interests** or those of other persons and organizations, such examples include but are not limited to:
 - For good governance, accounting, managing and auditing our business operations;
 - To monitor emails, calls, other communications, and activities on your account; and
 - To send you marketing communications about our products and services.
- As necessary **to comply with a legal obligation**:
 - For compliance with legal and regulatory requirements and related disclosures;
 - When you exercise rights under data protection law and make requests;
 - For establishment and defense of legal rights;
 - For activities relating to the prevention, detection and investigation of crime; and
 - To verify your identity, make credit, fraud prevention and anti-money laundering checks.

Sharing of your personal data

Subject to applicable data protection law and depending on the services provided, we may share your personal data with:

- Banco Santander S.A., Santander group companies and other banking entities in order to provide you with certain services within the contractual banking relationship, under your request;
- Sub-contractors and other persons who help us provide our products and services;
- Companies and other persons providing services to us;
- Our legal and other professional advisors, including our auditors;
- Fraud prevention agencies, and debt collection agencies when we open your account and periodically during your account or service management;

- Government bodies and agencies in Switzerland;
- Courts, to comply with legal requirements, and for the administration of justice;
- Other parties connected with your account e.g. directors, shareholders, beneficial owners or any named official who will see your transactions, with your authorization;
- Other parties when we might restructure or sell our business or its assets or have a merger or re-organization;
- Payment systems (e.g. American Express, Cornercard, Capitol, Visa or MasterCard) if we issue cards linked to your account, who may transfer your personal data to others as necessary to operate your account and for regulatory purposes, to process transactions, resolve disputes and for statistical purposes, including sending your personal data overseas; and
- Anyone else where we you have given your authorization or as required by law.

International Transfers

We may transfer personal data to recipients being established or domiciled outside the jurisdictions in which we are established or where the contact or the relationship are located.

The locations where the recipients to which we may transfer personal data to are:

- Switzerland, European Economic Area countries and UK where third-party processors may operate, Specially Spain where the Santander Group headquarters are established.

Such countries provide for an adequate level of data protection according to the assessment of the competent authority.

- Countries in which you have financial interests and in which you have transactional activity (e.g., payments, or securities transactions in relation to the services provided by us).
- Other selected jurisdictions where third party processors operate for the provision of specific financial and banking services.

In case there is a transfer of personal data to a country or territory that does not offer an adequate level of protection the transfer and processing of personal data is subject to appropriate safeguards, such as the Standard Contractual Clauses or you have given your consent regarding such cross-border transfer.

International Corridors

Where you may have international business needs and only when having your explicit authorization, we will share information related to your company, products and accounts, including transactional information, with Banco Santander S.A., Santander group companies and other partner banks that may be based in other countries, to better support the international operations of your company and decide whether to offer your company other products and services. For more information on whom those other Santander group companies or other partner banks are, you can contact your personal banker.

Protection of your personal data

We take appropriate technical and organizational measures to protect your data against loss, unintentional alteration, unwanted disclosure or unauthorized access. Such as: encrypting and pseudonymizing certain data, access restrictions, data processing instructions to our employees, protection and confidentiality agreements with our service providers, loggings, creating backups and recovery strategies.

Data anonymization and aggregation

Your personal data may be converted into statistical or aggregated data which cannot be used to identify you, although it can be used to produce statistical reports.

Identity verification and fraud prevention checks

The personal data we've collected from you at the account application or at any stage might be shared with fraud prevention agencies that will use it to prevent fraud and money-laundering and to verify your identity. We may also search and use our internal records for these purposes. We may also hold all the personal information you give to us (i.e. name, address, date of birth, nationality) to undertake periodic due diligence checks which banks are required to undertake to comply with legislation and regulation.

The personal data we have collected from you at the account application or at any stage might be shared with other financial institutions in order to conduct an investigation pertaining to your finance and business conduct.

Retention periods (whether or not you become a customer)

We only retain Personal Data as long as necessary to fulfil the processing for which it was collected. The following criteria are used to determine data retention periods for your personal data:

- Retention in case of queries. We will retain your personal data as long as necessary to deal with your queries (e.g. if your application is unsuccessful); and
- Retention in accordance with legal and regulatory requirements. We will retain your personal data after your account, service or relationship has been closed or has otherwise come to an end based on our legal and regulatory requirements. In the majority of cases this will be for ten years from the end of your relationship with the Bank.
- Due to requirements laid down by the Swiss Financial Market Supervisory Authority ("FINMA"), we are obliged to record external and internal telephone calls of all employees engaged in securities trading and store all electronic correspondence (e-mails, communication via Bloomberg or Reuters, etc.) and evidence of the calls made on business telephones by these employees for a period of two years.

Your rights under applicable data protection law

Your rights are as follows (noting that some of these rights apply only under certain circumstances):

- The right to ask us whether we are processing Data about you, and if so, to provide you with further information related thereto ("right to information");
- The right to have your personal data corrected if it is inaccurate and to have incomplete personal data completed ("right to rectification");
- The right to object to processing of your personal data;
- The right to restrict processing of your personal data;
- The right to have your personal data erased (the "right to be forgotten");
- The right to request access to your personal data and information about how we process it ("right of access by the data subject");
- The right to move, copy or transfer your personal data ("right to data portability").
- The right to withdraw your consent if and to the extent you have previously given your consent to any specific purpose of processing of your data. This will not affect the lawfulness of any processing carried out before you have withdrawn your consent (or any processing based on any legal basis other than your consent) and it may mean that we will no longer be able to provide our services to you.

For more details on all the above rights you can contact our Data Protection Officer (DPO) at the address mentioned at the beginning of this privacy notice.

General Data Protection Regulation (GDPR) – European Representative

Pursuant to Article 27 of the General Data Protection Regulation (GDPR), Banco Santander International SA has appointed European Data Protection Office (EDPO) as its GDPR Representative in the EU. You can contact EDPO regarding matters pertaining to the GDPR:

- By using EDPO's online request form: <https://edpo.com/gdpr-data-request/>
- By writing to EDPO at Avenue Huart Hamoir 71, 1030 Brussels, Belgium.

UK General Data Protection Regulation (GDPR) - UK Representative

Pursuant to Article 27 of the UK GDPR, Banco Santander International SA has appointed EDPO UK Ltd as its UK GDPR representative in the UK. You can contact EDPO UK regarding matters pertaining to the UK GDPR:

- By using EDPO's online request form: <https://edpo.com/uk-gdpr-data-request/>
- By writing to EDPO UK at 8 Northumberland Avenue, London WC2N 5BY, United Kingdom