



Swiss Life International Employee Benefits Pension Fund
(Collective Foundation)
(Foundation)

Data protection declaration

April 2023

The purpose of this data protection declaration is to provide you with transparent information about the processing of personal data by the Swiss Life International Employee Benefits Pension Fund, Industriestrasse 56, FL-9491 Ruggell (hereinafter referred to as the “foundation”).

1. Introduction

In connection with the occupational pensions provided, the foundation processes personal data.

The foundation has re-insured its obligations with Swiss Life Ltd, General-Guisan-Quai 40, 8022 Zurich (hereinafter “Swiss Life”). As the insurer, Swiss Life processes personal data in this context. The foundation and Swiss Life have also concluded contractual agreements on the basis of which Swiss Life assumes the foundation’s operational and administrative tasks. Swiss Life processes personal data in this context too.

The foundation and Swiss Life take the protection of your privacy and personal data very seriously. Accordingly, the relevant principles of the applicable data protection legislation apply in everyday practice at the foundation and Swiss Life.

This includes ensuring that the foundation and Swiss Life adequately and consistently protect your personal data and safeguard the confidentiality, integrity, availability, traceability and proportionality requirements when processing your data.

In this data protection declaration we would like to provide you with an overview of how the foundation handles your personal data. This description is not exhaustive. Other matters relevant to data protection may also be dealt with in other specific data protection declarations or general policy conditions and terms and conditions of business, conditions of participation and similar documents.

You can find information on the processing of personal data and on data protection at Swiss Life at <https://www.swisslife.ch/privacy>.

2. Name and contact details of the controller

The contact details of the **controller** are as follows:

Swiss Life International Employee Benefits Pension Fund
Industriestrasse 56
FL-9491 Ruggell

The contact details of the **data protection officer** for the foundation are as follows:

Data protection officer of the
Swiss Life International Employee Benefits Pension Fund
Industriestrasse 56
FL-9491 Ruggell

If you have any questions or concerns regarding data protection law that concern the processing of your personal data by the foundation, please contact the foundation's data protection officer.

You can also contact the foundation's data protection officer if you have any questions or concerns under data protection law regarding the processing of your personal data by Swiss Life. They will forward your enquiry to Swiss Life. However, you are also free to contact Swiss Life's data protection advisor directly (Swiss Life Ltd, Data Protection Officer, General-Guisan-Quai 40, P.O. Box, 8022 Zurich, datenschutz@swisslife.ch).

3. Categories of personal data processed

The following categories of personal data concerning you are processed for the purposes set out in section 4:

- Master data (e.g. first and last name, street, house number, place of residence, country of domicile, gender, date of birth, age, (social) insurance numbers, marital status, languages, nationality, residence permit, e-mail address, telephone number, occupation, employer, level of employment, salary, health data, beneficiaries);
- Contract, benefit case and benefit processing data (e.g. data on the contract of affiliation and pension plan, amount of your retirement savings, details of any purchases, early withdrawals for home ownership and pension compensation as a result of divorce, details of insured and current benefits, data in connection with applications, applications and insured events (in particular retirement, disability and death), including associated data on state of health as well as medical reports, expert reports and details of any proceedings and benefits from other (social) insurers details of limitations for pre-existing conditions);
- Payment data (e.g. payment method data, date and amount of incoming payments, outstanding and paid invoices, reminders);
- Communication data (e.g. type, place and time of communication and its content);
- Data in connection with legal disputes (e.g. data concerning complaints and differences in benefits or related contracts).

We usually receive personal data in the above-mentioned categories from you, but also potentially from third-party sources such as your family members, address service providers (master data), credit reporting agencies and other information service providers (e.g. master and financial data), representatives of you and other persons associated with you and your employer (e.g. master or contract data) and other sources (e.g. the media or internet).

If you act on behalf of third parties or provide us with third-party data (e.g. when designating beneficiaries), we assume that you have informed these third parties about our processing of their personal data.

4. Purposes of data processing

4.1. Settlement of occupational pensions

Your personal data are processed for the purpose of implementing occupational pensions, which includes in particular the following sub-purposes:

- Processing and managing contracts;
- Answering your queries and concerns;
- Calculating and collecting premiums, risk assessment;
- Providing advice;
- Assessing and calculating entitlements to benefits;
- Asserting rights of recourse against a liable third party;
- Risk assessment;
- Providing services and processing payment transactions;
- Providing information to and notifying the responsible supervisory authorities within the framework of the statutory duty to provide information (also see section 4.2 below);
- Communicating with the employer and the insured persons and providing information to the employer in accordance with the contractual and legal provisions;
- Contacting the insured person and issue documents concerning the implementation of occupational pensions.

For these purposes, we process in particular master data, contract and payment data as well as communication data. Health data is also processed for risk assessment purposes. However, this is only done with the consent of the insured

persons concerned and only if the employer has signed an application to implement occupational pensions with the foundation. Health data is treated in the strictest confidence and can only be viewed and processed by a restricted group of people (need-to-know principle).

4.2. Legal obligations and combating abuse

It is necessary to process personal data in order to comply with legal and regulatory requirements (e.g. statutory retention obligations, anti-money laundering laws, regulatory requirements, legal registration requirements, etc.). For this purpose we process, in particular, master data, contract data and financial data, as well as behavioural and communication data

If insurance fraud is suspected, the foundation and/or Swiss Life are entitled, subject to the principles of proportionality and data protection, to process personal data and pass it on to other insurers in Switzerland and abroad, detectives and law enforcement authorities for the purpose of uncovering or preventing insurance fraud.

4.3. Market research purposes and investigations

The foundation and/or Swiss Life use personal data to an appropriate extent for voluntary participation in surveys and investigations for market research purposes and to evaluate customer satisfaction. These results are used by the foundation and/or Swiss Life to actively address customer requests and continuously improve internal processes.

The answers from all the survey respondents are consolidated, evaluated anonymously and used for statistics (no interviews are conducted with open or covert advertising, sales or business intentions).

4.4. Data use by Swiss Life service units

Swiss Life service units may contact Swiss Life as part of customer service and/or for the purpose of customer support.

4.5. Data processing on the Swiss Life portals

Swiss Life provides a range of online customer portals for the use of customers, insured persons, employers, intermediaries and brokers. As part of the implementation of the occupational pensions offered by the foundation in accordance with the Liechtenstein Pension Funds Act, affiliated employers, insured persons, intermediaries and brokers (who have a contractual relationship with the employer) may use the following portals:

- Swiss Life customer portal;
- Swiss Life myLife.

Personal data can be accessed on these Swiss Life portals which can be processed within the scope of the respective portal's functions. The processing serves the administrative execution of the occupational pensions offered by the foundation.

4.6. Other processing purposes

We may process your data beyond the actual fulfilment of the contract or mandate if this is necessary for upholding our own legitimate interests or those of third parties. Examples include:

- Processing of personal data for the purpose of protecting data, secrets and assets;
- Personal data (including video recordings) is also processed for the security of systems and buildings;
- Further purposes include optimising and ensuring the functioning and security of the website(s) and other IT systems, preventing fraud, misdemeanours and crimes as well as investigating such offences and other inappropriate conduct, handling legal action and asserting, exercising or defending legal claims.

5. Legal basis

Your personal data will be processed

- based on the contracts of affiliation concluded between the foundation and an affiliated employer, or
- on the basis of the data subject's consent, or
- based on the legitimate interests of the foundation or third parties or
- based on legal provisions (e.g. Pension Funds Act - PFA)

6. Data recipients

Your personal data may be disclosed to the following categories of recipients insofar as this is necessary for the purposes set out in section 4:

- Group companies of the Swiss Life Group (for details see <https://www.swisslife.com/en/home/about-us.html>), in particular Swiss Life Ltd;
- employers affiliated with the foundation;
- Benefit recipients/beneficiaries;
- Intermediaries, address providers and brokers;
- Previous insurers, co-insurers and reinsurers;
- Social insurance schemes
- Authorities, register offices, courts and offices;
- Other third parties, e.g. banks;
- Internal and external service providers (e.g. IT service providers, address and shipping service providers, marketing, distribution, communication or printing service providers, service providers in building management, credit reporting agencies, debt collection service providers, consulting firms, auditors, etc.).

The aforementioned recipients may be located abroad (e.g. if the employer is domiciled abroad (i.e. not in the Principality of Liechtenstein or Switzerland), the insured person or the benefit recipient is not domiciled in the Principality of Liechtenstein or Switzerland, or the address for service is not in the Principality of Liechtenstein or Switzerland, when transmitting personal data to banks and other bodies in connection with assets located abroad, when purchasing IT services from abroad, in foreign legal proceedings, etc.). Data may therefore be processed anywhere in the world, including outside the EU or the European Economic Area (e.g. in the USA or on other continents [Asia, Africa]). Not all of these countries have a level of data protection equivalent to EU law. We therefore take contractual precautions and generally use the so-called standard contractual clauses adopted by the EU Commission for these purposes, unless an exception applies (e.g. in legal proceedings abroad, in cases of overriding public interest if the execution of the contract requires such disclosure or if the data subject has consented).

7. Duration of storage

Data is stored for as long as the processing purposes, statutory retention periods and legitimate interests of the foundation and/or Swiss Life in processing for documentation and evidence purposes require, or storage is technically necessary. The storage duration is based on legal and internal regulations and the processing purposes (section 4). If these purposes have been achieved or no longer apply and there is no longer any obligation to retain your data, we will delete or anonymise the data as part of the usual procedures at the foundation and/or Swiss Life.

8. Rights of the data subject

Subject to the legal requirements and within the corresponding scope, the data subjects have the following rights:

- The right to request information as to whether and which data is processed by the foundation or Swiss Life regarding the data subject.
- The right to have data rectified if it is inaccurate.
- The right to object to the processing and to request the cancellation of data, insofar as the foundation and/or Swiss Life are not obliged or entitled to further processing.
- The right to request the foundation and/or Swiss Life to hand over certain personal data in a standard electronic format or to request its transfer to another controller.
- The right to withdraw consent, if the processing is based on the data subject's consent.
- If the foundation and/or Swiss Life makes an automated decision in an individual case, the data subject will be informed of this and has the right to state their point of view and to request that the decision be reviewed by a natural person.
- The data subject has the right to lodge a complaint with a supervisory authority.
The Liechtenstein supervisory authority can be contacted at www.datenschutzstelle.li. However, we recommend that you first contact the foundation's data protection officer in the event of any complaints.

9. Data processing on the Swiss Life website

The foundation does not operate its own website. Information regarding the foundation can be found on the Swiss Life website. The processing of personal data in the context of the use of the Swiss Life website is governed by the data protection declaration published on the Swiss Life website.

10. Updating our data protection declaration

Our data protection declaration and the data protection information about our data processing are based on the principles of Articles 13, 14 and 21 GDPR. This privacy policy is for your information and does not form part of the contract. The foundation reserves the right to modify this data protection declaration without prior notice to take account of current statutory provisions and changed business procedures. We will inform you of any change in the purposes for which your personal data is processed if they are inconsistent with the purposes set out in this statement.

Swiss Life International Employee Benefits Pension Fund,
April 2023

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