

## Privacy Policy

Delen (Suisse) SA takes appropriate technical and organizational measures to keep your personal data confidential. We have always treated the protection of personal data as a matter of priority and we are doing our utmost to continue to earn your trust in the processing of this data.

At Delen (Suisse) SA, we want to be transparent about how we process your personal information, how we use that information, and how we respect your privacy.

### **1. Who are we and what is our responsibility?**

Delen (Suisse) SA is a Swiss securities dealer specializing in wealth management, whose registered office is located at 31, boulevard Helvétique, 1207 Geneva, Switzerland.

As such, we are responsible for processing the personal data of our clients and prospects. The processing includes all operations related to such personal data, such as collection, processing, storage and destruction. We always process this personal data with the utmost care. It is important for you to know that we have never sold your data to third parties in the past and we will never do so.

### **2. What personal data do we process?**

At Delen (Suisse) SA, we process a large amount of data concerning our clients:

- identification details (including last name, first name, postal/tax residency address, place and date of birth, passport/ID card);
- contact details (such as phone numbers and e-mail address);
- financial information (account number, transactions, overall financial situation);
- family circumstances (marital status, household composition, marriage contract);
- tax information (taxpayer identification number (TIN), tax residence);
- occupational information (such as CV, professional experience);
- hobbies (leisure activities);
- recorded telephone calls;
- secured data (such as IP address and e-ID reader number).

In some cases, we hold information about people associated with you (e.g. your underage children if you open an account on their behalf, or contact people on your account). Although we may not always have direct contact with these people, it might be important for you to inform them that we also hold this information.

Subject to certain conditions, we may hold data concerning people who cannot be considered as clients of Delen (Suisse) SA

### **3. Why and how do we process personal data?**

At Delen (Suisse) SA, we process your personal data to ensure that the service you receive complies with our contractual, legal and statutory obligations.

Wherever necessary, we collect and process your data for the following purposes:

- to contact you;
- to comply with our legal obligations (e.g. anti-money laundering and counter-terrorist financing rules, MiFID II Directive, Automatic Exchange of Information (AEOI));
- to comply with internal policy, to proactively manage risk within our organization, to verify your identity, or to keep our IT systems secure and running smoothly;
- to be able to meet our contractual obligations in due form (including managing your investments, transactions);
- to improve our services;
- to prevent, uncover and monitor abuse and fraud;
- to compile statistics and perform tests;
- for commercial/marketing purposes (unless you object).

### **4. How long is your data kept?**

The retention period varies depending on the type of data and how it is used. We only use your data for a specific, clearly defined purpose (e.g. to execute a contract, to comply with a legal obligation). We may keep your data for longer than the statutory retention period so that you can exercise your rights or so that we can exercise ours.

### **5. Who can we send your data to?**

Delen (Suisse) SA has never sold your personal data to third parties and will not do so in the future.

As part of the outsourcing of some tasks, we may transmit your data to carefully selected third parties who process certain data upon our request and for a clearly defined purpose. In order to keep your data secure, we require such third parties to comply with the same data protection and confidentiality obligations as we do.

Under Swiss and international law, we may be required to disclose certain information concerning our clients to clearly defined organizations and entities (such as the Swiss Financial Market Supervisory Authority (FINMA), the Swiss Federal Tax Administration, or external auditors requiring such information to perform their duties).

In circumstances such as these, we always do our utmost to treat your information with discretion and to keep your data confidential and secure.

### **6. What rights do you have?**

You have certain rights concerning the personal data that we process. These include the right to:

*a. Access your data*

You can access your personal data at any time. If you so wish, you may obtain a copy of the information we hold concerning you.

*b. Correct your data*

You have the right to request that we modify any information that is incorrect or incomplete.

*c. Delete your data*

You have the right to demand that we delete your data. We must fulfill your request without delay unless we need to process your data to comply with a legal obligation.

*d. Transfer your data to a third party*

You have the right to obtain your data in a structured format, and to request that it be transferred to a third party.

*e. Object to the processing of your data in certain circumstances*

You may object to the processing of your data in certain circumstances at any time. We will comply with your request unless we need to process your data to fulfill our legal or contractual obligations.

## **7. How can you exercise your rights?**

You can exercise your rights by sending a letter to Delen (Suisse) SA, 31, boulevard Helvétique, 1207 Geneva, Switzerland, marked for the attention of the “Data Protection Expert (DPE)”, or by sending an e-mail to [privacy@delen.ch](mailto:privacy@delen.ch).

We reserve the right to charge a fee to cover our costs if you exercise your rights disproportionately.

To confirm your identity, and to make sure no one else is exercising your rights, we may ask you a few questions and/or request a copy of your ID card.

We will process all such requests and you will receive a reply promptly, no later than one month after we receive your request.

Depending on the complexity of your request, or the number of requests we receive, this period can be extended by two months if necessary. We will always inform you of the deadline extension no later than one month after we receive your request.

If the DPE is unable to fulfill your request, we will inform you no later than one month after we receive it, explaining the reasons for our decision.

If you are unhappy with our response, you have the right to file a complaint with the data protection authority in your country where you live or work, or in the country where you believe the data protection problem arose.

## **8. Who can you contact for further information?**

Delen (Suisse) SA may modify this policy without notice. You can find the most recent version on our website at [www.delen.ch](http://www.delen.ch). You will be informed of important changes via the usual channels.

Further information about data protection law can also be found on the website of the Swiss Confederation at:

<https://www.edoeb.admin.ch/edoeb/fr/home/protection-des-donnees/generalites/protection-des-donnees.html#-541055011>.

If you have any questions or comments regarding this policy, you can contact us and we will gladly assist.

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