

# Privacy Statement

Würth Financial Services AG

Version dated May 11, 2023

Würth Financial Services AG (hereinafter referred to as “WFS” or “we”) takes the protection of your personal data very seriously. We handle your personal data confidentially and in accordance with the applicable statutory data protection regulations.

## 1. General Information about Data Processing and Scope

This Privacy Statement explains what we do with your personal data when you use our website or other related applications, make use of our services or products, enter into a contract with us, communicate with us or otherwise interact with us.

In this Privacy Statement, we use the term “data” interchangeably with “personal data”. The term “personal data” means any information relating to a specified or specifiable individual. Processing means any handling of personal data, e.g., the collection, storage, use, disclosure or erasure of personal data.

The scope of this Privacy Statement covers all websites, applications, services, contracts, means of communication and tools, regardless of how they are accessed or used (including mobile devices), and applies to the processing of personal data that we have already collected or will collect.

The terms of this Privacy Statement are subject to any additional terms, disclaimers or other contractual terms that you may have agreed to with WFS, such as consent forms, contract terms, general terms and conditions, additional data protection policies, forms and notices.

This Privacy Statement may be updated from time to time. Please review the Privacy Statement periodically.

## 2. Contact Point for Data Protection Concerns

WFS acts as the data controller within the meaning of relevant data protection laws and regulations and is responsible for the data processing described in this Privacy Statement, unless otherwise notified in individual cases.

If you have any questions or concerns regarding data protection or would like to exercise your rights under Section 10, please contact WFS’s Data Protection Officer:

- Email address: info@wuerth-fs.com
- Mailing address: Würth Financial Services AG  
Data Protection  
Churerstrasse 10  
9400 Rorschach

## 3. Processing of Personal Data

Depending on the situation and purpose, we process different types of personal data from various sources. We primarily collect these data directly from you, for example when you provide us with data, communicate with us or use our services.

However, we may also receive data from other sources, such as public registers or other publicly available sources (e.g., public databases, the Internet, the press), government authorities, or other third parties (e.g., insurance companies).

If you provide or disclose data about other individuals (e.g., employees or other parties to a contract), we will assume that you are authorized to do so and that these data are accurate. By transmitting data about third parties, you acknowledge this.

We may process several categories of personal data about you. The main ones are as follows:

- **Master data:**  
We use the term “master data” to refer to the basic data that we require to process our contractual and other business relationships or for marketing and promotional purposes. This includes your name, contact details, information about, e.g., your role and function, language preferences, bank details, date of birth, customer history, powers of attorney, authorizations to sign, etc.
- **Financial and Risk Data:**  
These are data relating to your income, assets, financial situation and financial behavior, as well as additional data used to combat abuse and fraud and to comply with anti-money laundering regulations or other legal requirements.
- **Tax data:**  
These are data used to comply with requirements under tax law. Tax data may include information about your tax residency, relevant certifications and documents, the Tax Identification Number (TIN), tax returns and assessments, and information related to the Automatic Exchange of Information (AIA), Foreign Account Tax Compliance Act (FATCA), and Qualified Intermediary Agreement (QI Agreement).
- **Additional information on contractual relationship:**  
These are data generated in connection with the conclusion or performance of a contract, e.g., information about contracts, services to be provided or already provided, as well as data from the pre-contractual phase, information required or used for processing, and details of responses (e.g., complaints or information about satisfaction).
- **Behavioral and preference data:**  
Depending on our relationship with you, we may want to get to know you better and tailor our products, services and offers to you. To do this, we collect and use data about your behavior and preferences. We analyze information about your behavior in our area and may supplement this information with information from third parties, including publicly available sources. This allows us to calculate the likelihood that you will use certain services or behave in a certain way. The data processed for this purpose are sometimes already known to us (e.g., when you use our services) or we collect these data by recording your behavior (e.g., how you navigate our website or by determining your movement profile, e.g., through the use of your mobile phone).
- **Location data:**  
When you use our website or other electronic services, we may collect data about where you or the applicable device is located at a particular time or where you are going.
- **Other data:**  
We also collect data from you in other situations. Data may arise in connection with administrative or judicial proceedings (such as files, evidence, etc.) that may also relate to you. We may receive or create photographs, videos and audio recordings in which you may be recognizable (e.g., at events, through security cameras, etc.). We may also collect data about who enters certain buildings and when, or who has access rights (including access controls based on registration data or visitor lists, etc.), who participates in events or activities (e.g., contests), or who uses our infrastructure and systems and when.
- **Visitor and communication data:**  
These are data relating to our communications with you through written correspondence, by phone and via

electronic channels. It may also include data from our communications with third parties, authentication data, and video and audio recordings. If we need to verify your identity (e.g., for a request for information), we may also collect data to identify you (e.g., a copy of an identification document).

- **Technical data:**

When you use our website or other electronic services, we collect your device's IP address and other technical data. These data also include logs that indicate the use of our systems.

- **Particularly sensitive personal data:**

These are data relating to health, intimate life, racial or ethnic origin, genetic data, biometric data, data concerning social security benefits, administrative or criminal proceedings and sanctions, and data concerning religious, philosophical, political or trade-union opinions or activities.

It is important to note that without your personal data WFS would not be able to provide its services or enter into or perform any contract with you.

#### 4. Purpose of Data Processing and Legal Basis for Data Processing

Your personal data will be used in accordance with legal requirements, in particular for the purposes set out below:

- We process data for the establishment, advising, administration, execution and termination of contractual relationships, e.g., for individual customer advising, risk assessment, offering insurance contracts, obtaining offers for insurance products, product brokerage, claims processing, etc. For life insurance and pension fund contracts, we also process particularly sensitive personal data (e.g., health, genetic or biometric data) for the establishment, administration, execution and termination of these contracts.
- We process your data for the purpose of communicating with you, in particular to respond to your requests, to enforce your rights (Section 10) and to contact you in regards to any queries.
- We process data for marketing purposes, the implementation of our marketing objectives (marketing activities) and relationship management.
- We process your data for market research, to improve our services and operations, and for product development.
- We may also process your data for security and access control purposes.
- We process personal data to comply with laws, orders and recommendations by authorities as well as internal policies ("compliance").
- We process data to prevent fraud and other illegal activities, for our risk management purposes, and to ensure prudent corporate governance.
- We may also process your data for other purposes, e.g., internal operations and administration, training and quality assurance, and to assert our rights in the event of a dispute.

Depending on the purpose of the data processing, we base the processing of your personal data on the need to initiate or execute a contract with you (or the entity you represent), your consent, or our legitimate interests or the legitimate interests of a third party. Our legitimate interests include compliance with legal requirements. They also include marketing our products and services, understanding our markets better, and ensuring the safe, secure and efficient operation and development of our business, including its operational aspects.

#### 5. Disclosure of Personal Data

We do not disclose your personal data to unauthorized third parties. However, in order for WFS to provide its services, it is necessary to disclose your personal data. Depending on the purpose, this may include disclosure to insurance companies, pension fund institutions, IT service providers (data storage, data processing, etc.), Group companies

(accounting, controlling, etc.), government authorities and other official bodies, service providers, contract partners or other involved parties, auditing companies, etc.

## 6. Location of Data Processing

As explained in Section 5, not only we, but also other entities may process your personal data as necessary. These entities may be located in countries other than Switzerland. Therefore, your data may be processed worldwide, including outside the EU or the European Economic Area (so-called third countries).

If the recipients are located in countries that do not provide adequate legal protection for personal data, we will contractually bind them to comply with data protection requirements, usually by entering into standard contractual clauses. Please note that such contractual provisions may partially compensate for weaker or no legal protection, but cannot completely eliminate all risks (e.g., from government access abroad). We may waive this requirement if they are already subject to a recognized European data protection agreement or if we can rely on an exception. The latter may be the case, in particular, in foreign legal proceedings, in cases of overriding public interest, or if the performance of a contract requires such disclosure, if you have given us your consent, or if it concerns data that you have made publicly available and have not objected to their processing.

Please also note that data exchanged over the Internet is often routed through third countries. Therefore, your data may be transferred abroad even if the sender and recipient are located in the same country.

## 7. Protection of Personal Data

We take appropriate security measures to maintain the confidentiality, integrity, and availability of your personal data, to protect such data against unauthorized or unlawful processing, and to mitigate the risks of loss, accidental modification, unintended disclosure, or unauthorized access.

With the WFS Customer Portal, we provide you with an infrastructure that complies with the legal requirements for communicating with you and processing your personal data. We ask that you use this infrastructure to help us protect your personal data and communicate with you securely.

Any electronic transmission of personal data over the Internet (e.g., email), as well as via SMS or other unencrypted channels, or via WhatsApp and other messaging applications, is subject to the risk of damage, manipulation or loss of such data. WFS assumes no liability for this risk.

## 8. Duration of Personal Data Processing

We will process your personal data for as long as is necessary for our processing purposes, legal retention periods, and our legitimate interests in processing for documentation, archiving and evidentiary purposes, or if storage is technically necessary.

## 9. Use of Cookies and Other Technologies

Cookies / Tracking and other technologies in connection with the use of our websites and apps.

We usually use "cookies" and similar technologies (e.g., tracking pixels) on our websites and apps to identify your browser or device. A cookie is a small file that is sent to your computer or automatically saved on your computer or mobile device by the web browser you are using when you visit our website or install our app. When you return to this website or use our app again, we can recognize you, even if we do not know who you are. In addition to so-called session cookies, which are used only during a session and deleted after your visit to the site, so-called persistent cookies may also be used to save user preferences and other information for a specific period of time (e.g., two years). However,

you can configure your browser to reject cookies, to save them for a single session only, or to delete them before they expire. Most browsers are preset to accept cookies. We use persistent cookies to save user preferences (e.g., language, auto-login), to better understand how you use our services and content, and to provide you with customized offers and advertising. If you choose to block cookies, certain features (e.g., language selection, shopping cart, ordering processes) may not work.

In our newsletters and other marketing emails, we may also include partially visible and invisible graphical elements (known as "tracking pixels"), where permitted. By retrieving these elements from our servers, we can determine if and when you opened the email, allowing us to measure and better understand how you use our services and tailor them to you. You can block this in your email program; most are set to do this by default.

By using our websites and apps and agreeing to receive newsletters and other marketing emails, you consent to our use of these techniques. If you do not want us to do so, you must change the settings in your browser or email program, or uninstall the app if the settings do not allow you to do so.

We may also use so-called social networking plugins on our sites, such as Facebook, Twitter, Youtube, Pinterest or Instagram. You will be notified of this (typically through icons). We have configured these elements so they are disabled by default. If you enable them (by clicking on them), the operators of the respective social networks can register that you are on our website and where you are, and they can use this information for their own purposes. The processing of your personal data then falls under the responsibility of the respective operator according to their data protection or privacy policies. We do not receive any information about you from them.

You can find additional information on data collection at our website here:

<https://www.wuerth-fs.com/de/financialservices/privacy/datenschutz/datenschutz.php>

Additional information about data collection for customers using WFS digital distribution channels (such as InsurHub, mortgage broker platforms, etc.):

<https://plausible.io/data-policy>

<https://sendgrid.com/resource/general-data-protection-regulation-2/>

## 10. Rights of the Data Subject

Under applicable data protection laws, you have the following rights in certain circumstances:

- the right to object to the processing of your data;
- the right to request information from us about whether and what data we are processing in regards to you;
- the right to have data corrected if they are inaccurate;
- the right to have data erased;
- the right to require us to provide specific personal data in a commonly used electronic format or to transfer such data to another controller;
- the right to withdraw consent where our processing is based on your consent;
- the right to obtain, upon request, further information necessary to exercise these rights.

If you wish to exercise any of the above rights with us, please write to the Data Protection Officer named in Section 2. In order to prevent abuse, we may need to identify you (e.g., with a copy of your identification document). Please note that these rights may be subject to conditions, exceptions or limitations under applicable data protection laws (e.g., for the protection of third parties or trade secrets). We will notify you of these where applicable.