

## Information Notice related to the Swift Transaction Processing Services

Vontobel Holding AG and any of its affiliated entities (“Vontobel”, “us” or “we”) highly appreciate your interest in Vontobel and our products and services. Your privacy is important to us and we want you to feel comfortable using our products and services. It is a major concern for Vontobel that your personal data<sup>1</sup> is treated in a responsible manner and in compliance with legal requirements.

### 1. Scope of this Information Notice and responsible units

This Information Notice specifically relates to the Swift Transaction Processing Services and is applicable in addition to our Privacy Policy. For general information about how we process personal data please consult our Privacy Policy at: [vontobel.com/privacy-policy](https://vontobel.com/privacy-policy)

The joint controllers for the processing of personal data in the context of the Swift Transaction Processing Services are the following:

- **Vontobel Holding AG** and/or the Vontobel affiliated entity/entities that you have a current or potential business relationship with, listed under “responsible units and contact details” at: [vontobel.com/privacy-policy](https://vontobel.com/privacy-policy)
- **S.W.I.F.T. SC**, Avenue Adèle 1, 1310 La Hulpe, Belgium (“Swift”)

### 2. Processing related to the Swift Transaction Processing Services

Your personal data may be processed in the context of the Swift Transaction Processing Services, which enable us to send and receive financial messages or files, and to pre-validate, track and manage financial transactions.

The personal data that may be processed for the purposes of the Swift Transaction Processing Services are personal data as contained in transaction processing data. They include the following categories of personal data:

- Identification data (such as name, address)
- Financial data (such as account number of an instructing or beneficiary party in a payment transaction)
- Transaction identifier (such as UETR, transaction reference number (TRN), or UTI)

### 3. Purpose and legal basis of processing

Together with Swift, we have a legitimate interest in processing your personal data, namely to ensure the security, efficiency and transparency of financial transactions you may be involved in.

### 4. Further information and contact

For further information on the data protection practices of Swift in relation to the processing of your personal data in the context of the Swift Transaction Processing Services, please consult the Swift Personal Data Protection Policy (PDPP), available at: <https://www.swift.com/about-us/legal/compliance/data-protection-policies>

You may contact us by using our online form ([vontobel.com/data-privacy-request-form](https://vontobel.com/data-privacy-request-form)) or by sending your request to either one of our Data Protection Officer email addresses or via regular mail to the contact points referred to in our Privacy Policy at: [vontobel.com/privacy-policy](https://vontobel.com/privacy-policy)

### 5. Amendments to this Information Notice

This Information Notice was last updated on 29 February 2024. You can find the applicable version on our website. Vontobel reserves the right to amend this Information Notice from time to time and will inform you of such an amendment in an appropriate manner (for example, it will be posted on our website).

<sup>1</sup> As such term is defined by data protection laws and regulations.