



## Online Banking and Mobile Banking Privacy Statement

Last updated: February 02, 2018

Deutsche Bank recognizes the importance of protecting the privacy of the personal information which has been transmitted to us. We believe that the confidentiality and protection of information entrusted to us by our clients and Online Banking and Mobile Banking users (online users) is one of our fundamental responsibilities. We have been safeguarding our clients' privacy for decades by maintaining strict standards of security and procedures which are specially designed to prevent misuse of this information. This Privacy Statement describes how we, Deutsche Bank (Suisse) SA ("Deutsche Bank"), located at Prime Tower, Hardstrasse 201, 8005 Zürich, email [dbs.dpo@db.com](mailto:dbs.dpo@db.com), as controller collect and process personal data and other information of you or of you in your capacity as the authorised representative / agent of the legal entity (hereinafter referred to as "you"), when using eBanking services via Online Banking (<https://dwoch.db.com>) and Mobile Banking.

### 1. What categories of Personal Data do we collect and process?

We collect and process information by which you can be identified ("Personal Data").

This information includes the following Personal Data when you log in to Online Banking or Mobile Banking: user name, password and code generated via hard or soft token ("Log in Data"). You will be provided with the Log in Data from us when you sign up for the eBanking services. The code will be generated by the token upon the log in.

We also process the following Personal Data available in your eBanking account including log in credentials, account data incl. statements, portfolio data, and transaction data ("Account Data"), which we received from you upon account opening and eBanking opening and which depend on the transactions on your account.

We also collect device and usage information, which includes information specific to the used device to access Online Banking and Mobile Banking (including language preferences) ("Usage Information"). We collect such information when you are browsing Online Banking and Mobile Banking.

### 2. Why does Deutsche Bank collect Personal Data and what is the legal basis?

We process the aforementioned personal data in compliance with the provisions of the Swiss Federal Act on Data Protection (FADP) and if applicable the EU General Data Protection Regulation (GDPR).



We collect and process your Log in Data and Account Data to provide you with the eBanking services and to better serve your financial needs, i.e. that you can access your account statements online, and to administer our business. We collect, retain and use Usage Data about you for the purposes of better serving you, e.g. to remember your language preferences.

The legal basis for the processing of Log in Data and Account Data is E-banking enrollment. The legal basis for Usage Data are our legitimate interests which are the following: to maintain the performance of Online Banking and Mobile Banking and to analyze usage.

The provision of Personal Data is compulsory. If you do not provide your Personal Data, you cannot use Online Banking and Mobile Banking. The legal basis for marketing is your consent. The provision of your Personal Data for marketing purposes is voluntary. You have the right to withdraw consent at any time, without affecting the lawfulness of the processing based on consent before its withdrawal. If you do not consent or withdraw your consent your data will not be used for that purpose any longer and you will not receive marketing materials by us.

### **3. How long will Personal Data be stored?**

Log in Data and Account Data will normally be stored until it has fulfilled the purpose it was collected for, i.e. during the eBanking enrollment with you. Once our relationship has come to an end, we will store your Log in Data and Account Data according to statutory limitation periods and then delete them, unless statutory retention periods apply or if necessary to establish, exercise or defend a legal claim. This also applies to Usage Data, unless you object to the respective processing in which case we will erase or anonymize such information.

### **4. What is a communication protocol and how do we use it?**

Deutsche Bank is committed to the continuous improvement of our services. We use so-called tracking technologies such as cookies and tags for statistical purposes and to improve user experience.

Technically, a cookie is a small text file that is used to store information about a website visit for a limited period of time. The stored information consists of at least two components, the name of the cookie and its content, including the accessed webpages.

Cookies are used to improve the end-user experience by using the former mentioned tracking technologies. Users can configure their browser to prevent or warn against cookies. However certain functions or services might not be available in this case.

### **5. Who will have access to my Personal Data?**



The Personal Data gathered will be stored by Deutsche Bank and only accessed by the team responsible for you. Personal Data may be shared with service providers that provide IT services for us and act as processors. Those service providers are located in Switzerland (for which an adequacy decision of the EU Commission exists) and process Personal Data in Switzerland. If your relationship manager is with another Deutsche Bank group company, your Personal Data may also be accessed by the relationship manager of such other Deutsche Bank group company in order to better serve your financial needs. It will only be used according to the purpose for which the data has been collected. We reserve the right to disclose your information only in circumstances where disclosure is required under the law, to cooperate with regulators or law enforcement authorities or to protect our rights and property as permitted by law.

## **6. How is Personal Data protected?**

Pages where we collect Personal Data from our website visitors are usually encrypted with your browser's internal encryption module. These pages, as well as the internet banking-system of Deutsche Bank are certified by international accredited certification institutions. Deutsche Bank has implemented additional, comprehensive security procedures for our internet-banking-system. A firewall is deployed as a means to prevent external access to account information from Deutsche Bank's system. We also deploy multiple layers of encryption and identification to address the concern of unauthorized inquiries or interception by the transmission of client information.

If, at any time, you are not satisfied with our procedure to protect your privacy or if you have questions regarding the collecting and/or use of your Personal Data or regarding our privacy statement, please contact us. We will use all commercially reasonable efforts to promptly address your concern.

## **7. Your rights**

Pursuant to applicable data protection law you may have the right (i) to request access to your Personal Data, (ii) to request rectification of your Personal Data, (iii) to request erasure of your Personal Data, (iv) to request restriction of processing of your Personal Data, (v) to request data portability, (vi) to object to the processing of your Personal Data (including objection to profiling) and (v) to withdraw consent at any time without affecting the lawfulness of the processing based on consent before its withdrawal.

### **a. Right of access**

You may have the right to obtain from us confirmation as to whether or not Personal Data concerning you is processed, and, where that is the case, to request access to the Personal Data. The access information include – inter alia – the purposes of the processing, the categories of Personal Data



concerned, and the recipients or categories of recipient to whom the Personal Data have been or will be disclosed.

You may have the right to obtain a copy of the Personal Data undergoing processing. For further copies requested by you, we may charge a reasonable fee based on administrative costs.

**b. Right to rectification**

You may have the right to obtain from us the rectification of inaccurate Personal Data concerning you. Depending on the purposes of the processing, you may have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.

**c. Right to erasure (“right to be forgotten”)**

Under certain circumstances you may have the right to obtain from us the erasure of Personal Data concerning you and we may be obliged to erase such Personal Data.

**d. Right to restriction of processing**

Under certain circumstances you may have the right to obtain from us restriction of processing your Personal Data. In this case the respective data will be marked and may only be processed by us for certain purposes.

**e. Right to data portability**

Under certain circumstances you may have the right to receive the Personal Data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit those data to another entity without hindrance from us.

**f. Right to object**

Under certain circumstances you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your Personal Data, including profiling, by us and we can be required to no longer process your Personal Data. As we process and use your Personal Data primarily for purposes of carrying out the contractual relationship with you, we will in principle have a legitimate interest for the processing which will override your objection request, unless the objection request relates to marketing activities.

To exercise your rights please contact us as stated below.

You also have the right to lodge a complaint with the competent data protection supervisory authority. Our data protection officer can be contacted as follows: Prime Tower, Hardstrasse 201, 8005 Zürich or by email [dbs.dpo@db.com](mailto:dbs.dpo@db.com).

**Various**

We reserve the right to modify this Privacy Statement at any time. Nevertheless we will actively inform you about changes.