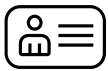




Data protection declaration of **eGroup Europe SA**



General personal data

We process general personal data for you.



Financial data

We process your financial data.



Health data

We process your health data.



Location data

We process your location data.



Worldwide

We also process your personal data outside of Switzerland and the EU.



Private sphere

We process data relating to your private and intimate sphere.



Provided data

We process personal data you provide us with.



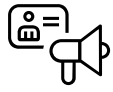
Collected data

We process personal data we collect about you.



Received data

We process personal data about you that we receive from third parties.



Marketing

We use your personal data for marketing and advertising.



Product development

We use your personal data for the development and improvement of our products and services.



Other purposes

We use your personal data for other purposes unrelated to the core service.



Data disclosure

We disclose your data to other companies who can decide for themselves how to use them.

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1. What is this data protection declaration about?

eGroup Europe SA (hereafter also «we», «us») procures and processes personal data relating to you or also other persons (so-called «**third parties**»). We are using the term «**data**» interchangeably with «**personal data**» here.

In this data protection declaration, we describe what we are doing with your data when you use www.egroup-europe.com (hereafter «**website**»), buy our services or products, are otherwise associated with us in a contractual framework, communicate with us or have anything else to do with us. Where required, we will inform you of additional processing activities not mentioned in this data protection declaration in time and in writing. In addition, we can also inform you about the processing of your data separately on other occasions, e.g. in declarations of consent, contract terms, additional data privacy statements, forms and notices.

If you disclose and/or provide data to us about other persons, i.e. relatives or colleagues, we assume that you are authorized to do so and that these data are correct. You confirm this by submitting data about third parties. Please also make sure that these third parties have been informed about this data protection declaration.

This data protection declaration is designed for the requirements of the EU General Data Protection Regulation («**GDPR**»), Swiss Data Protection Act («**DPA**»), and revised Swiss Data Protection Act («**revDPA**»). If and to what extent these laws are applicable depends on the individual case, however.

2. Who is responsible for the processing of your data?

The controller of the data processing activities described in this data protection declaration under data protection law is **eGroup Europe SA, L-8399 Windhof («eGroup Europe»)** insofar as not communicated otherwise in individual cases, e.g. in further data privacy statements, forms or contracts.

You can reach us as follows with your data protection queries and to exercise your rights as per sect. 10:

eGroup Europe SA
22, rue de l'Industrie
L-8399 Windhof
datenschutz@epension.com

3. Which data do we process?

We process various categories of data about you, with the latest and possibly also the earlier information if provided data change. The most important categories are the following:

- **Technical data:** When you use our website, we collect the IP address of your device and other technical data to maintain the functionality and safety. These data also include logs documenting the use of our systems. We will usually keep technical data for 6 months. We can also allocate an individual code to you and/or your device to ensure the functionality of these services (e.g. in the form of a cookie, see sect. 11). The technical data themselves principally do not permit conclusions to be drawn about your identity.
- **Registration data:** Registration data can be collected in access controls for specific systems. We will usually keep registration data for 12 months after granting access.
- **Communication data:** If you are in contact with us by e-mail, telephone, letter or other communication media, we will collect the data exchanged between us, including your contact data and the peripheral data of the communication. If we wish or need to establish your identity, e.g. with requests for information, we will collect data to identify you (e.g. a copy of an ID card). We will usually keep these data for 12 months from the last exchange between us. This period can also be longer if required for reasons of proof, for compliance with statutory or contractual requirements, or for technical reasons. E-mails in personal mailboxes and written correspondences are usually kept for a minimum of 10 years.
- **Master data:** Master data is our term for basic data that we need along with the contractual data (see below) to conduct our contractual and other business relationships, or for marketing and advertising purposes, such as your name, contact data, and information about your role and function, your bank account(s), date of birth,

customer history, powers of attorney, powers to sign, and declarations of consent, for example. We will process your master data if you are a customer or other business contact or work for them (e.g. as the contact person of a business partner), or because we wish to contact you for our own purposes or those of ePension Fund Europe (ASSEF), based in L-2540 Luxembourg (hereafter «ePension»), e.g. in connection with marketing and advertising for ePension. We obtain master data from you personally (e.g. when you visit our trade fair booth), from organizations you work for, or from third parties such as our contract partners (e.g. brokers), as well as from publicly accessible sources such as public registers or the internet (e.g. telephone directory websites), for example. We can also process health data and information about third parties as part of the master data, and collect master data of our shareholders and investors. We will usually keep these data for [10] years from the last exchange between us, but from the end of contract as a minimum. This period can also be longer if required for reasons of proof, for compliance with statutory or contractual requirements, or for technical reasons. With pure marketing and advertising contacts, the period is normally much shorter, usually no more than [2] years from the last contact.

- **Contract data:** These are data collected in connection with a contract being concluded or performed with us directly or with ePension, as represented by us, e.g. information about contracts and the services provided or to be provided, data from the preliminary stages of a contract conclusion, information required or used for contract performance, and information on responses (e.g. complaints). This can also include the data of staff at the employers affiliated with ePension (e.g. master data, gross pay, tax ID, social security number, etc.). We will usually collect contract data from you, from contract partners and third parties involved in the contract performance, but also from third sources (e.g. providers of creditworthiness data) and publicly accessible sources. We will usually keep these data for 10 years from the last contract activity, but from the end of contract as a minimum. This period can also be longer if required for reasons of proof, for compliance with statutory or contractual requirements, or for technical reasons.
- **Other data:** We will also collect data of yours in other situations. Any data accrued in connection with official or judicial proceedings (such as files, evidence, etc.) may relate to you, for example. We can also collect data for health protection reasons (e.g. as part of protection concepts). We can receive or create photos, videos or sound recordings wherein you may be recognizable (e.g. who visited our trade fair booth or used our infrastructure and systems, and when). And we finally also collect and process data about our shareholders and other investors; besides master data, these also include information for the respective registers, for the exercising of your rights, and the organization of events (e.g. general meetings). The retention periods for these data are based on the purpose and limited to the necessary minimum. This ranges from a few days with many security cameras and usually a number of weeks for contact tracing data via the 3 months visitor data are usually kept for, through to reports about events with pictures, which can be kept for a number of years or longer. Data about you as a

shareholder or other investor will be kept as required by company law, but for as long as you are invested in any case.

Many of the data detailed in this section 3 are disclosed to us by you personally (e.g. by way of forms, in the communication with us, in connection with contracts, when you use the website, etc.). You are not obliged to do so except in isolated cases, e.g. as part of binding protection concepts (statutory requirements). If you conclude contracts with us or wish to be provided with a service, you will also need to provide us with data according to the relevant contract, especially master data and contract data, as part of your contractual obligations. The processing of technical data is unavoidable when you use our website. If you wish to access specific systems, you will need to provide us with registration data.

Insofar as not unlawful, we also collect data from publicly accessible sources (e.g. broker directories, internet, etc.) or receive data from our group companies ePension and eCare AG (based in CH-6330 Cham, hereafter «eCare»), from authorities and other third parties (e.g. credit bureaus such as Creditreform, for example).

4. What do we process your data for?

We process your data for the purposes we explain below. Please see sect. 11 for more information on the online segment. These purposes and/or their underlying aims constitute legitimate interests of ours and possible third parties. You can find more information on the legal basis of our processing in sect. 5.

We process your data for purposes relating to our **communication with you**, particularly to respond to requests and for you to exercise your rights (sect. 10), and to contact you if we have any queries. We particularly use communication data and master data for this. We keep these data to document our communication with you, for training purposes, quality assurance, and for later enquiries.

We process data for establishing, managing and handling **contractual relationships** in our own name or representing ePension. Where we act for ePension, we will particularly process your data for after-sales services and official affiliation notifications (**behördlicher Anschlussmeldungen**).

We process data for **marketing purposes** in the name of ePension, e.g. to provide potential clients who are interested in ePension's services or products and come into contact with us at trade fairs or via agents with individual consultancy (incl. by telephone and other "live" channels) and information (e.g. brochures), electronically or by post. We also use data to contact potential distribution partners (brokers) by post. You can object to such contacts at any time (see the end of this sect. 4) and/or withhold or revoke consent to the contacting for advertising purposes.

We furthermore process your data for **market research**, to **improve our services and business**, and for **product development**.

We can also process your data for **security purposes** and for **access control**.

We process personal data to **comply with laws, instructions and recommendations from authorities, and with internal regulations («compliance»).**

We also process data for purposes of our **risk management** and as part of our prudent **company management**, including business organization and corporate development.

We can process your data **for other purposes**, e.g. in our internal workflows and administration, or in protecting our rights.

5. On what grounds do we process your data?

Insofar as not asking for your **consent** for specific processing activities (e.g. the processing of particularly sensitive personal data, like data about your health), we will inform you separately of the respective purposes of the processing. You can revoke your consent with effect for the future at any time by a written notification (by post) or, where not agreed or stated otherwise, by e-mail to us; you can find our contact data in sect. 2. Upon receipt of the notification revoking your consent, we will no longer process the data for the purposes you agreed to originally, unless we have other legal grounds for this. The lawfulness of the processing based on your consent before you revoked it remains unaffected by your revocation of consent.

Where we are not asking for your consent to processing, our processing of your personal data is based on its necessity for the **initiation or performance of a contract** with you (or the body you represent) in our name or that of e-Pension, or on us or third parties having a **legitimate interest** in it, especially to be able to pursue the purposes and attendant objectives described in sect. 4 above, and to apply the corresponding measures. This also includes compliance with **legal provisions**, insofar as their observance is not already recognized as a legal basis by the respectively applicable data protection legislation (e.g. the legislation in the EEA or Switzerland with the GDPR).

When we are provided with sensitive data (e.g. health data), we can also process your data on other legal grounds, e.g. in case of disputes based on the processing's necessity for a possible trial, or the assertion or repulsion of **legal claims**. Other legal grounds may apply in individual cases, which we will communicate to you separately to the required extent.

6. Who do we disclose your data to?

In connection with our contracts, the website, our services and products, our legal obligations, or otherwise for the protection of our legitimate interests and the other purposes detailed in sect. 4, we also disclose personal data to third parties, especially to the following categories of recipient:

- **Contract partners incl. clients of ePension:** This primarily refers to our distribution partners (brokers), with whom we mostly exchange your master and contract data, as well as our other contract partners. These also include specific group companies, especially ePension, for which we handle the affiliation contracts with the fund, eCare, which provides us with a platform for managing the master and contract data, and

eFrame AG (hereafter «**eFrame**»), based in CH-6430 Schwyz, which provides us with IT services (see «service providers» below). We can also disclose health data to these group companies. ePension can use the data under this data protection declaration for itself for the same purposes as us (see sect. 4). It also refers to the contract partners of ePension (employers and affiliated individual persons), however, as well as the benefit recipients, because this data disclosure arises from these contracts. If you are working for such a contract partner yourself, we can also supply it with data about you in this context (e.g. concerning the communication between us).

- **Service providers:** We cooperate with service providers at home and abroad that process data about you at our behest or in joint responsibility with us, or receive data about you from us on their own responsibility (e.g. IT providers, cleaning companies, banks, debt-collection agencies, or credit agencies). This can also include health data. The central IT service providers for us are Microsoft and eFrame, and the VP Bank in Luxembourg for debt collection.
- **Authorities:** We can disclose personal data to government agencies, courts of law and other authorities at home and abroad if we are legally obliged or authorized to do so, or where this is deemed necessary to protect our interests. This can also include health data. The authorities process the data about you they receive from us on their own responsibility.
- **Other persons:** This refers to other cases where the involvement of third parties arises from the purposes as per sect. 4, e.g. benefit recipients.

All these categories of recipient can in turn involve third parties, so that your data may also become available to them. We can restrict the processing by specific third parties (e.g. IT providers), but not others (e.g. authorities, banks, etc.).

7. Will your personal data also be sent abroad?

As explained in sect. 6, we also disclose data in other places. These are not only located in Luxembourg. Your data can thus also be processed in other European countries as well as the USA, but in exceptional cases in any country in the world.

If they are based in a country lacking adequate statutory data protection, we contractually require recipients to ensure data protection (for which we use the standard contract provisions of the European Commission, available [here](#)), insofar as they are not already subject to legally recognized regulations ensuring data protection and we are unable to invoke an exemption clause. An exemption can namely apply in legal proceedings abroad, but also in cases of prevailing public interests, or if a contract performance necessitates such a disclosure, if you have consented, or where the data concerned have been made generally available by you without objecting to their processing.

8. How long do we process your data for?

We will process your data for as long as required for our processing purposes, by statutory retention periods, for our legitimate interests in this processing for evidentiary and documentation purposes, or where a storage takes place for technical reasons. You can find further information on the respective storage and processing periods in the individual data categories in sect. 3 and/or cookie categories in sect. 11. Where not prohibited by statutory or contractual requirements, we will delete or anonymize your data in the course of our usual workflows upon the expiry of the storage or processing period.

9. How do we protect your data?

We apply adequate security measures to ensure the confidentiality, integrity and availability of your personal data, protect them from unauthorized or unlawful processing, and from the risks of loss, unintentional amendment, unintended disclosure or unauthorized access.

10. Which rights do you have?

Under specific circumstances, the applicable data protection regulations entitle you to object to the processing of your data, especially for purposes of direct marketing and further legitimate interests in the processing.

To facilitate your control over the processing of your personal data, you additionally have the following rights relating to our data processing, depending on the applicable data protection legislation:

- the right to demand information from us as to whether we process data of yours and which ones;
- the right to have data rectified by us if they are incorrect;
- the right to demand the erasure of data;
- the right to demand from us the surrender of specific personal data in a commonly used electronic format, or their transmission to another controller;
- the right to withdraw your consent insofar as our processing is based on it;
- the right to be provided, upon request, with further information helpful for exercising these rights.

If you wish to exercise the aforementioned rights vis-a-vis our company, please contact us in writing, personally at our address or, where not stated or agreed otherwise, by e-mail; see sect. 2 for our contact data. We will need to identify you to exclude misuse (e.g. with a copy of your ID card, insofar as no other options exist).

Please note that these rights are subject to conditions, exceptions or restrictions under the applicable data protection legislation (e.g. to protect third parties or trade secrets). We will inform you accordingly as required.

If you do not agree with our handling of your rights or data protection, please let us (sect. 2) know. Especially if you are based in the EEA, United Kingdom or Switzerland, you additionally have a right to file a complaint with the supervisory authority in your country. You can find a list of the authorities in the EEA here: https://edpb.europa.eu/about-edpb/board/members_de. The supervisory authority of the United Kingdom is available here: <https://ico.org.uk/global/contact-us/>. You can reach the Swiss supervisory authority here: <https://www.edoeb.admin.ch/edoeb/de/home/der-edoeb/kontakt/adresse.html>.

11. Do we use online tracking technologies?

We use various technologies on our website to enable us and third parties involved by us to recognize you when you use it, and possibly also track you over several visits. In this section, we will inform you about this.

The core concern is our ability to differentiate between your visits (using your system) and other users' visits so that we can maintain the functionality of the website and provide for personalizations. The technologies we use are designed to recognize you as an individual visitor (without knowing your identity) whenever you visit the website, for example by our server allocating a specific tag number (so-called «cookie») to you or your browser, respectively.

We only use **essential cookies** on our website. This means that these cookies are essential for the functioning of the website as such, or for specific functions. One of the cookies ensures the connection to the web app, for example. This cookie only exists temporarily («session cookie»). If you block it, the website could fail to function. Another cookie is used to enable the server to save your language selection for longer than one session (i.e. one website visit). This cookie has a lifetime of 24 months.

You can program your browser to block or mislead specific cookies or delete existing cookies. You can find more information on this in the help pages of your browser (usually under the keyword «data protection») or on the websites of the third parties we list below.

12. Can this data protection declaration be changed?

This data protection declaration is not an integral part of a contract with you. We can adjust this data protection declaration at any time. The version published on this website is the respectively latest version.

Last update: 27/04/2021