

Annex 6

Data Protection Policy –

KYC Records

Introduction

This data protection policy explains how KYC Spider AG (“KYC”, “we”, “us” or “our”) collects and processes personal data in the context of the provision of our services with respect to the KYC-Records (“KYC-Records”). It also provides information about the data subjects rights and about how the data subject can contact us in the event of questions about how we handle the corresponding data in said context.

Contact

All contact addresses can be found at <http://www.kyc.ch/>. If you have any questions regarding data protection, please do not hesitate to contact us:

KYC Spider AG
Gubelstrasse 11
CH-6300 Zug

Our data protection coordinator (currently Melanie Spiess) can also be reached via the following contact details: Phone number: +41 41 726 99 69; email address: contact@kyc.ch.

Personal data and the performance of client services

Our clients engage us on a wide range of matters to help them mitigate risks, for example to conduct due diligence and other screening activities on potential business partners and suppliers. In most cases, our clients engage us to fulfil specific legal or regulatory obligations and risk management procedures carried out in the public interest, in particular Swiss, EU or EU-member state anti-money laundering regulations [inter alia GAFI, Swiss AMLA]. We believe that KYC has a legitimate interest in processing data to support its clients in these objectives provided that the privacy rights of any data subject are not unduly affected.

In connection with our services and to maintain the KYC-Records we collect various types of personal data from a variety of different public sources such as public records and registers including sanction and watch lists, online and print media, and the internet.

The personal data we collect and process in the performance of services for and on behalf of our clients includes but is not limited to any information relating to a living individual in which the individual is identified or identifiable, for example, the individual's name, gender, date of birth, contact information, as well as, where necessary, data concerning criminal convictions and offences, etc.

Please find additional information about our KYC Records under the following [link](#).

We collect and process data in accordance with the purposes specified in this notice, namely, to provide or perform the services requested by clients and individuals. This takes place on the basis of our legitimate business interests in conducting and managing our business as well as on the basis of obligations provided by laws, current national and international regulations which our clients are subject to.

How data is processed

Personal data is processed both manually and electronically in accordance with the above-mentioned purposes and hence in compliance with applicable law. We permit only authorized KYC employees and third-party providers to have access to your information. Such employees and third-party providers are appropriately designated and trained to process data only according to the instructions we provide them.

Storage of Personal Data

KYC will retain personal data, taking into account the respective source of the data, the relevance thereof with respect to the purposes of the processing, our legitimate business needs to capture and retain such information as well as obligations provided by laws, current national and international regulations which our clients are subject to.

Data Subject's Rights

The data subject has the right to information, correction, limitation of data processing, deletion of personal data, objection under data protection law for the future and data transferability within the framework of the respectively applicable data protection law and to the extent and subject to any limitations / exceptions (in particular [art. 17 para. 3 GDPR](#)) provided for therein. The data subject may file a corresponding request through our website or using the above contact details.

In addition, the data subject has the right to assert its claims in court or to file a complaint with the responsible data protection authority. Switzerland's competent data protection authority is the Federal Data Protection and Information Commissioner.

KYC remains the right to request from the data subject appropriate proof of identity (such as copy of data subject's ID or passport) prior to granting the rights set out above.

Amendments to this privacy statement

We reserve the right to change this Dataprivacy Policy at any time without notice. We will notify you of any changes by posting the updated Dataprivacy Policy on our website. Any changes we make will be effective from the date we post them on our website.

KYC Spider AG, January 2019