

Information sheet on the disclosure of Client Data in connection with transactions and securities trading

In this information sheet, you will find important information on the disclosure of Client Data in relation to payment transactions and securities trading in Switzerland and abroad. Other cases of disclosure of Client Data by Hypothekarbank Lenzburg AG (hereinafter «HBL») that are regulated in other agreements with the Client or about which HBL informs the Client in other documents shall remain reserved.

1. Why does Client Data have to be disclosed?

Due to national and international regulations, applicable laws, licensing and contractual conditions, industry practices and compliance standards, banks are sometimes obliged to disclose Client Data to third parties. These provisions serve to fight tax evasion, money laundering and terrorist financing, as well as to enforce sanctions. There are also disclosure and reporting obligations in order to meet the requirements for market transparency and/or to be able to carry out transactions.

In particular, there are disclosure obligations in connection with trading and custody of securities (including corporate actions as well as transactions in securities traded abroad where a local investor or tax number is required), payment transactions, foreign exchange transactions, derivatives, precious metals and commodities.

In addition, banks are obliged to disclose Client Data within the scope of the EU Shareholder Rights Directive II, as listed companies based in the EU or EEA may require banks to identify their shareholders in order to improve communication between the company and its shareholders.

2. When can Client Data be disclosed?

Client Data may be disclosed when processing cross-border and domestic payments. Disclosures may be required before, during or after the execution of a transaction, and in certain cases, even after the end of the banking relationship.

In addition, Client Data may be disclosed in connection with the safekeeping of securities and with cross-border and domestic transactions in securities, namely purchases and sales, transfers and derivative transactions. Further information can be found on the website of the Swiss Bankers Association at www.swissbanking.org «Information for bank clients and companies».

3. What Client Data can be disclosed?

The following Client Data may be disclosed:

- Information on Clients, authorised representatives, beneficial owners and other parties involved (e.g. name, date of birth, nationality, domicile, duration of the banking relationship)
- Information about the transaction or service concerned (e.g. reason for payment, context of payment, type of investment, number of shares or date of acquisition).

4. Who can receive Client Data?

The recipients of Client Data vary from case to case, depending on the type of transaction, the service and the specific role of the third-party in question.

- Banks of principals and beneficiaries;
- Correspondent banks and custodian banks;
- Operators of stock exchanges, securities trading and payment systems (e.g. the companies of the SIX Group);
- SWIFT (message transmission system, i.e. transmission of information between financial institutions, e.g. in payment and securities transactions)
- Swiss and foreign regulators, registries, system operators or authorities and other third parties;
- Other financial market infrastructures, e.g. trading, clearing and custodian centres for securities;
- Listed companies within the scope of the EU Shareholder Rights Directive II and third parties commissioned by them to process notifications.

5. How is Client Data protected?

Client Data is protected by Swiss law (e.g. Swiss bank client secrecy and the Federal Data Protection Act). HBL protects Client Data through appropriate technical and organisational measures.

If Client Data is transferred abroad, it is no longer protected by Swiss law but is subject to the provisions of the respective foreign legal system. Foreign laws and official orders may require the disclosure of Client Data to authorities and other third parties.

Client Data, once disclosed to third parties, is no longer under the control of HBL. HBL does not necessarily have knowledge of or influence over how Client Data is processed by third parties after disclosure and disclaims any liability in this regard.

Further information on the processing of Client Data by HBL can be found in HBL's Privacy Policy, available at www.hbl.ch/rechtliches.

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