

Data Protection Statement

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1 What is the purpose of this statement?

The purpose of this statement is to present the measures adopted by the Sogel Pension Fund (hereinafter: Sogel or the Pension Fund) with regard to data protection and to define the main principles arising from the Federal Act on Data Protection (FADP). It also aims to inform the persons concerned of their rights in relation to the processing of personal data.

2 Who is responsible for data processing?

As a foundation defined in Articles 80 et seq. of the Swiss Civil Code and Articles 48 and 49 of the Federal Law on Occupational Retirement, Survivors' and Disability Pension Plans (LPP), the Pension Fund processes the data of its insured persons in accordance with the data protection regulations. It collects and processes data as part of its activities.

The responsible is the Sogel Pension Fund.

3 Who may you contact about data protection?

If you have any question about this statement or about the processing of your personal data, please contact the Data Protection Officer at the following address:

Sogel
Data Protection Officer
P. O. Box 288
CH-1001 Lausanne

dataprotection.sogel@retraitespopulaires.ch

4 How do we process your personal data?

Sogel undertakes to :

- use your data only for legitimate and specific purposes in accordance with the services offered to you;
- collect only the data required for these purposes;
- keep your data for no longer than is necessary for these operations;
- communicate your data only to authorised persons or organisations who need it for the purposes of the Pension Fund's activities;
- inform you in a clear and transparent way about how your data is processed and about your rights.

We process your data directly or indirectly, using third parties who process personal data on our behalf ("processors"), in particular Retraites Populaires in its capacity as manager of the Pension Fund.

5 Which personal data do we process?

Personal data is any information relating to an identified or identifiable individual. Sensitive data relates in particular to health, prosecution or criminal and administrative sanctions.

We collect:

- information sent to us by your employer as part of the management of your pension scheme;
- information you provide to us orally or in writing in connection with any other business relationship you have with us;
- information provided to us by third parties (e.g. insurers, reinsurers, healthcare professionals or public authorities) for the purposes of establishing, managing and monitoring the relationship;
- information about your computer terminals when you visit websites provided and other IT services (in particular via cookies and similar technologies).

6 For which purposes and on which legal basis do we process personal data?

We collect and process personal data during our activities, in compliance with the legal, regulatory and contractual obligations to which we are subject, in particular:

- acquiring of new insured persons/employers;
- processing of benefit cases;
- calculating solvency and defining pricing strategy;
- monitoring all customer relations;
- producing statistical analyses and reports;
- checking compliance with legal and regulatory provisions;
- supporting activities such as accounting, information system management and logistics.

Your personal data may also be processed on the basis of our legitimate interests.

7 Do we use automated decision-making?

We do not use automated decision-making in relation with the concerned persons.

8 Which sources do we use to collect your personal data?

In the context of our activities, we collect or receive personal data:

- directly from the persons concerned;
- indirectly provided by third parties, in particular your employer.

9 To whom is your personal data communicated?

Your personal data is processed by the Pension Fund, its processors, in particular Retraites Populaires, or service providers when they are involved in carrying out our activities. Your personal data is communicated to:

- service providers;
- public bodies, social insurers, experts, doctors, pensions funds and administrative or judicial authorities, at their request;
- auditors or legal counsels.

In the context of its activities, Sogel ensures that personal data is only processed by third parties in accordance with the law or a contract, that the third party is entitled to process the personal data concerned and that disclosure to a third party is not expressly prohibited by law or a contractual obligation. Both our processors and our partners undertake to comply with the legal requirements on data protection.

10 Is your personal data transmitted abroad?

Basically, personal data is processed in Switzerland. However, certain data may be communicated abroad if circumstances so require (e.g. pensioners abroad).

11 How is data security ensured?

Sogel ensures that appropriate measures using the latest technology are put in place to guarantee data security and the confidentiality of personal data. These technologies include, for example, the encryption of data transmission and the restriction of access rights. We regularly check these measures and adapt them if necessary. Processors and service providers are obliged to respect data protection and confidentiality at all times.

12 Which are your rights with regard to the processing of personal data?

When the Pension Fund processes data, the data subject has various rights depending on the type of processing. In particular, the applicable legislation provides for a right of access to data concerning him or her. In addition to this right, data subjects have the right to rectification, opposition, restriction of processing and deletion of personal data. Where applicable, the data subject also has a right to data portability and a right of objection to the competent supervisory authority for the data protection.

In addition, Sogel ensures that the right to object to the processing of data for direct promotional purposes is respected. Where the processing of personal data by the Pension Fund is based on the consent of the data subject, the latter may withdraw it at any time, provided that the processing is no longer necessary in the context of the existing relationship. Such withdrawal in no way affects any prior processing of personal data.

Data processing rights may only be exercised in writing. In such cases, the request must be accompanied by an official document proving the identity of the person concerned, and the purpose of the request must be specified in as much detail as possible.

13 Where and for how long is your personal data stored?

Sogel ensures that data processing complies with the principle of proportionality. Personal data cannot be kept indefinitely. The length of retention varies according to the data concerned and the applicable law. Sogel undertakes to limit it to no longer than necessary for the purposes of processing. In all cases, personal data is kept for the duration of the relationship with the Pension Fund, plus any statutory limitation periods. The retention period may also be longer in the event of a dispute or legal proceedings, or when justified by the protection of an overriding interest.

Your personal data is stored on secure computer servers in Switzerland.

14 When is this statement updated?

This statement is regularly updated. The published version is authoritative. This document may be translated into other languages. For the interpretation, the original French text shall apply.