Privacy policy app

This English version of the Privacy Policy is a translation provided for your convenience. The German version is the sole legally binding document. You can find the German version here.

Our privacy policy describes what personal data Findependent AG collects, processes, uses and stores about you when you use the findependent app. Personal data is all information that relates to an identified or identifiable natural person. We treat your personal data confidentially and in accordance with the statutory data protection regulations and this privacy policy.

Your personal data will only be transferred to third parties if this is necessary for the purpose of processing the contract, if you have given your prior consent, or if this is permitted or required by law.

We would like to point out that data transmission on the Internet (e.g. communication by e-mail) can have security gaps. Complete protection of data against access by third parties is not possible.

This statement may be updated at any time and we will always inform you of any changes. The current version of the privacy policy is available on our website at www.findependent.ch/en/privacy-policy.

1. Responsible body

The collection, processing and use of the personal data collected from you when using the findependent app is carried out by:

Findependent AG, Kasernenstrasse 26, 5000 Aarau, Switzerland («findependent»),
E-Mail: service@findependent.ch

You can find more information about findependent in the imprint of our website.

2. Scope and delimitation

This privacy policy only applies to the use of the findependent App and thus in particular not to:

- visiting and using the findependent website (for further information on data protection in connection with the use of the findependent website, please refer to the applicable privacy policy on our website);
- personal information that may be collected and stored as part of announced recordings of telephone conversations with our employees in order to comply with our legal obligations or for findependent's business purposes;
- other websites to which you are redirected via a link.

3. Legal bases for data processing

We collect, process and use your personal data lawfully and in good faith. Depending on the purpose of the respective data processing, findependent processes your personal data on the following legal basis:

3.1 Contractual obligations

With first priority, findependent processes personal data in the context of the initiation or execution of contracts with clients, in particular in order to manage, operate, maintain and improve the findependent app and the services offered on it.

3.2 Legal obligations

findependent must comply with the applicable laws and may be obliged to disclose, report and surrender your personal data on the basis of a legal obligation or an official order.

3.3 To safeguard legitimate interests

Where necessary, findependent processes your personal data beyond the actual performance of the contract in order to protect its own legitimate interests or the legitimate interests of third parties, e.g. to monitor and control money laundering and other operational risks, for planning, product development and statistical purposes, for marketing and market research purposes in order to provide appropriate information about findependent's range of services and to protect and secure findependent's claims in the event of claims against findependent or findependent's clients, as well as to protect the security of clients and employees.

3.4 Consent

For further processing purposes beyond the actual fulfilment of the contract, the processing of your personal data may be based on your consent, which you can revoke at any time.

4. What personal data does findependent use?

findependent aims to store only as much data about you as is necessary to offer you the full range of functions with the highest possible level of security. In order to be able to offer you the usage options in accordance with the contract, findependent collects, stores, processes and uses personal data. Your personal data will only be passed on to third parties if we are obliged to do so by law, if you have given your prior consent, or if these third parties can claim a legitimate interest. Additional offers that require further processing of your personal data require your explicit consent.

4.1 Login findependent App

To log in to the findependent app you must enter your mobile phone number and password.

4.2 Identification with fingerprint and facial recognition

The findependent app allows you to log in using fingerprint and facial recognition if the device you are using supports this function. In this context, neither findependent nor the findependent app will receive your biometric data. If you would like more information on how identification by fingerprint or facial recognition works, please contact the respective provider of this function.

4.3 Data collection and processing when opening and using the findependent portfolio and concluding the asset management contract

Core data: For the purpose of opening the findependent investment solution, using the services of findependent and concluding the asset management contract, the following personal data is collected, used, processed and stored during onboarding:

- First and last name
- Date of birth
- Gender
- Marital status
- Email address
- Nationality
- Residential address
- Mobile phone number
- Beneficial ownership
- Tax domicile and US tax liability
- Audio and video recordings made during identification
- Copy of identification document
- Type of identification document
- Date of issue
- Date of expiry
- ID number
- if applicable: recording of the front and back of your CH residence permit
- if applicable: particularly sensitive personal data, in connection with any political activity at national level ("Politically Exposed Person" according to the Money Laundering Act).

Cancellation: If you terminate your findependent investment solution, customer data will remain stored at findependent for 10 years in order to prevent misuse and in accordance with regulatory requirements.

Properly uninstalling the findependent app will result in all data generated by the app locally on your device being deleted. Should you request it, we subsequently erase all personal data (name, address, transactions, etc.) from productive systems, if permitted

by law. For unstructured data, such as tickets with questions about a technical problem or data that has been backed up, findependent cannot guarantee complete deletion.

Notifications: If you use the findependent app, you will be able to activate the "Notifications" function to receive up-to-date information about findependent. This feature uses the Apple Push Notification Service (APNS) provided by Apple Inc ("Apple"), or the Google Cloud Messaging Service (GCM) provided by Google Inc ("Google"). If you would like more information on how this works, please contact the relevant provider of this feature. findependent will send you an appropriate notification depending on your device's operating system. In any case, the notification will be transmitted in encrypted form.

Identification procedure: Findependent is legally obliged to verify your identification by means of a valid identification document when you open an account and to store certain details of the identification document. For this purpose, we offer you an online identification option which is carried out in accordance with the criteria of FINMA Circular 2016/7 "Video and Online Identification" ("FINMA RS") of the Swiss Financial Market Supervisory Authority FINMA ("FINMA").

We rely on the services of the company Intrum AG (hereinafter referred to as "Intrum"), which is resident and active in Switzerland, for the online identification process. The identification is carried out, among other things, by means of an electronic copy of the identification document via encrypted transmission channels.

For the purpose of carrying out the online identification, a secure connection is established between Intrum and your end device, which enables the required digital verification of the identification features. In order to perform this digital verification, the app must be able to access the rear and front cameras of your end device so that photos (as well as a continuous video) of you, and the front and back of your ID, can be taken. These photos, the video, and the recorded personal data are transmitted by Intrum to findependent.

During the online identification, findependent must assure itself of the authenticity of the ID card or passport you have presented. To this end, Intrum's software electronically verifies the integrity of the identification document and the respective optical security features of the document, as prescribed by regulations. Should the security features not be clearly recognizable or if other irregularities are present, a manual review of the taken photos by an Intrum employee may follow.

Customer support: For the provision of customer support, findependent uses the systems of Freshworks Inc San Mateo California. In order for findependent to be able to help you in the best possible way, the following information can be provided exclusively for the purpose of support services: Name, first name, email, contract number, language, telephone number. The data thus deposited will be stored in a data processing centre in the European Union in accordance with the applicable data protection regulations. More information can be found here. findependent stores the exchanges between you and our customer support, regardless of whether we communicate by email or chat or

telephone, so that we can better support you in future enquiries. Questions asked via the Apple App Store or the Google App Store, social media; such as Facebook or Twitter, can also trigger a ticket and be saved via Freshworks' software.

Electronic Communication: For the provision of our services and communication with you, we use the systems of Idea 2 Collective GmbH, a company resident and active in Switzerland, operating under the brand name "aivie" (hereinafter referred to as the "Dispatch Service Provider"). The Dispatch Service Provider supports us with the technical handling of emails, SMS, push notifications, and in-app messages.

Depending on the type of communication, personal data is transferred to the Dispatch Service Provider, specifically:

- Contact details: e.g., email address, name, telephone number.
- Device information: e.g., an anonymized device identifier (token) for sending push notifications.
- Usage data/metadata: For marketing communications, we may record whether a message was opened and which links were clicked (tracking). This helps us improve our communication and make it more relevant.

The Dispatch Service Provider is used so that we can send you newsletters tailored to you and prevent you from receiving information multiple times.

The jointly shared data is stored in a data center in Switzerland in compliance with applicable data protection regulations. You can find the Dispatch Service Provider's data protection agreement at https://aivie.ch/privacy-policy/.

5. What data does the findependent app create?

Usage data: findependent collects, processes, uses and stores data that accrues when using the findependent app in order to improve the user experience and prevent misuse. In particular, this includes the IP address, screen resolution and operating system of the device used for the call, the date and time of the call, the duration of the visit and the content called up during a visit (together "usage data").

«Invite friends»: findependent offers you the option to invite your friends to findependent. If your personal invitation code is captured during registration, the name of the inviter and invitee may be displayed to each other (e.g., in an email). In this context, you agree to the disclosure of your personal data to the invitee or inviter and release findependent from confidentiality obligations to that extent.

6. Does findependent use non-personal/anonymous data?

Non-personal/anonymous data, such as statistics about the device you are using, cannot be used to draw conclusions about you. We use such data to continuously optimise the performance and the offer of the findependent app.

7. What does findependent do to protect your personal data?

findependent is subject to the Swiss Data Protection Act and implements appropriate technical and organizational security measures to protect your personal data from unauthorized access and misuse. These measures include physical and logical access controls, the use of personalized logins and 2-factor authentication, encrypted storage of personal data on the database, regular backups, recovery concepts, employee training, and access rights based on the principle of least privilege.

The communication between the findependent backend, the findependent app, and third-party providers is completely encrypted using the standardized TLS/SSL protocol.

8. How are third party services used?

Just like banks, we also rely on the services of third parties, such as our data centre. Your personal data is always protected in any case.

Third-party provider: In order to use the technical or organisational services of third parties that we require to fulfil the purposes set out in this privacy policy or our other business activities, personal or other data of users may be stored in the systems of such service providers, which are stored in a data centre in Switzerland certified in accordance with ISO27001 standards, but also personal data stored in the customer support systems of Freshworks Inc San Mateo California in accordance with the applicable data protection regulations in a data centre in the European Union. Our service providers are subject to the respective data protection laws and are also contractually obliged to process the personal data exclusively on our behalf and in accordance with our instructions. We oblige our service providers to comply with technical and organisational measures that ensure the protection of personal data.

9. What about analysis services and tracking technologies?

To enable a statistical analysis of your usage behavior, findependent uses carefully selected analysis services and tracking technologies. The data collected in this way is anonymized. Only how the findependent app is used is recorded, e.g. page views and loading times, but never personal or customer-identifying data or content. The data collected in this way is used exclusively for troubleshooting and optimizing the customer experience.

10. What about emails?

You have the option in every email from us to unsubscribe from further product information or e-mails - with the exception of e-mails that are necessary for the customer relationship or its termination. You can either do this yourself in the footer of the e-mail or, if this function is not available, by contacting our customer support.

For sending emails, findependent stores your email address, your first name, and your chosen language, as well as (if necessary) attributes related to the customer segment, with our Dispatch Service Provider for the delivery of the emails.

You can find more information on the data protection of our Dispatch Service Provider at https://aivie.ch/privacy-policy/.

11. Will my personal data be transferred abroad?

Personal data is transferred outside Switzerland if it is necessary for the provision of services (e.g. in the case of identification), if it is required by law (e.g. as part of the automatic exchange of information) or if you have given your consent. findependent ensures in each case (e.g. through the use of appropriate data protection contracts) that the recipients of the personal data guarantee an appropriate level of data protection.

In the context of providing customer support, all personal data, as described in section 4, is stored in a data centre in the European Union via the systems of Freshworks Inc San Mateo California, in accordance with the General Data Protection Regulation (GDPR).

12. Retention period for personal data

Findependent processes and stores your personal data for the entire duration of the business relationship (from initiation, account opening to contract termination) and beyond in accordance with the statutory retention and documentation obligations. It is possible that personal data will be retained for the period during which claims can be asserted against our company and insofar as we are otherwise legally obliged to do so or if legitimate business interests require this (e.g. for evidence and documentation purposes). As soon as your personal data is no longer required for the purposes stated above, it will be deleted or anonymised to the extent possible.

13. How can I find out more?

Duty to provide information: Upon request, findependent will provide you with information about all personal data stored about you, recipients or categories of recipients who have received personal data about you from us, and the purpose of the storage. If personal data stored about you is incorrect, we ask you to contact customer support so that we can correct it immediately or, if the functionality exists, to adjust the personal data directly yourself in the findependent app. Furthermore, you have the right to block, delete or destroy this data. Statutory restrictions remain reserved.

If you have given your consent to the use of data, you can revoke this consent at any time with effect for the future. The revocation of consent may mean that our services are no longer available to you without restriction or that the user relationship is terminated.

Customer support: For help using the findependent app or for general questions about this privacy policy and data protection at findependent, you can always contact our support at service@findependent.ch or by mail at Findependent AG, Kasernenstrasse 26, 5000 Aarau, Switzerland.

14. Entry into force

This privacy policy comes into force immediately. findependent reserves the right to make changes to the privacy policy at any time. These will be announced to the customer by e-mail and are deemed to be approved without objection within 30 days. If no declaration of objection is made within this period, which begins upon receipt of the e-mail message, the amended data protection statement shall be deemed to have been agreed and accepted.