

## Privacy Policy Schindler Pension Fund

### Content

1	Purpose of this Privacy Policy .....	1
2	Whom can insured persons contact for further information and who is the data controller? .....	1
3	What personal data is used? .....	1
4	What are the sources of the data? .....	2
5	For what purposes is the data used? .....	2
6	What is the justification for processing the data? .....	2
7	Who has access to the data? .....	3
8	Disclosure of data to other parties .....	3
9	How long will the data be processed and retained? .....	3
10	What rights do insured persons have in connection with the processing of their data? .....	4
11	How is the data protected? .....	4
12	Changes to this Privacy Policy .....	4

### 1 Purpose of this Privacy Policy

---

The Schindler Pension Fund ("Schindler PF") is responsible for implementing the occupational pension schemes of insured employees ("insured persons") and their relatives and survivors. The occupational pension scheme is intended to enable insured persons to continue their previous standard of living in an appropriate manner.

The Schindler PF provides insured persons with an online portal ("Pension Fund Portal") where they can view information on their pension fund benefits and make their own pension calculations.

Schindler PF and all its affiliated companies strive to maintain the privacy and security of the insured persons and to treat the personal data in accordance with the applicable data protection laws. The term "personal data" in this privacy policy refers to any information that identifies a natural person or that can be used to identify a natural person with appropriate justification.

Schindler PF is committed to ensuring that the collection and use of personal data collected as part of the occupational pension scheme is done in a transparent manner. This privacy policy applies to the online Pension Fund Portal and contains general information on how Schindler PF collects, processes, stores and discloses personal data for the processing of occupational pension benefits.

### 2 Whom can insured persons contact for further information and who is the data controller?

---

If you have any questions or comments regarding this privacy policy, the personal data processed or data security, insured persons can contact the office of the Schindler Pension Fund, Zugerstrasse 13, 6030 Ebikon, telephone +41 41 445 31 71, e-mail: [pk.ch@schindler.com](mailto:pk.ch@schindler.com).

### 3 What personal data is used?

---

Schindler PF processes those personal data of the insured persons that are necessary for the processing of the occupational pension scheme. The data used may include, in particular:

- Contact details, such as name, address, telephone number and e-mail address
- Social security number
- Date of birth, gender, language

- Salary
- Activity level
- Marital status
- Copy of marriage certificate/family record booklet
- Copies of children's certificates of education
- Unpaid leave and sabbaticals
- Payment details
- Information related to early or ordinary retirement
- Information about medical or health problems, including information about any illness-related disability
- Information about accidents, including information about any accident-related disability
- Information in the event of death
- Information in connection with advance payments and pledges in the context of the promotion of home ownership
- Information in connection with the pension compensation in the event of divorce
- Information in connection with garnishment/insolvency notices
- Information in connection with securing of pension assets in the event of neglect of the family support obligations

#### 4 What are the sources of the data?

---

The personal data used, which are required for the execution of your occupational pension scheme, come in particular from the following sources:

- Directly from the insured persons
- Human Resources department of affiliated companies
- Other social insurances
- Banks (e.g., for promotion of home ownership) or private insurance (e.g. loss of income insurance)
- Authorities and courts (e.g. in the case of divorce)
- Specialized agencies entrusted with the collection of family support contributions

#### 5 For what purposes is the data used?

---

Schindler PF uses the personal data exclusively for the execution of the occupational pension scheme. This includes, in particular the following purposes:

- Calculation of benefits on entry and exit, retirements, promotion of home ownership, purchase into the pension fund
- Calculation of benefits in the event of disability or death for insured persons or their survivors
- Clarification of the Schindler PF's obligation to pay benefits in connection with death or disability
- Compliance with the insurance relationship in accordance with the regulations of the Schindler PF and the legal requirements on occupational pension schemes

#### 6 What is the justification for processing the data?

---

Schindler PF processes the personal data in accordance with applicable occupational pension laws, employment and data protection laws and in accordance with the applicable regulations of the Schindler PF. This includes, for example, the following justifications:

- Fulfilment of the insured person's employment contract
- Fulfilment and compliance with legal and regulatory obligations regarding occupational pension schemes
- Legitimate interest of Schindler PF (e.g., protection of business secrets or security of the IT systems used)
- Essential interest of the insured or interests of other persons such as relatives or survivors
- Consent of the insured persons who have given them on a voluntary basis for a specific purpose (e.g., promotion of home ownership; voluntary purchase into the pension fund)

For the processing of personal data for the above-mentioned reasons, including for the execution of occupational pension schemes, Schindler PF does not require the consent of the insured persons in every case. However, for certain purposes and special categories of data, Schindler PF may request the written consent of the insured persons. In these cases, Schindler PF informs insured persons of the data that is processed and how and why it is needed. Insured persons may consider whether they wish to give their consent. They are entitled at any time to revoke their consent with effect for the future and to request Schindler PF to delete the data provide.

## 7 Who has access to the data?

---

In principle, the data will only be processed by Schindler PF. However, in some cases, other internal and external parties are also involved in the processing of the personal data, namely:

- Internal departments: e.g. Human Resources department of the insured's employer, finance, accounting, IT, audit, compliance;
- External service providers: e.g. pension fund expert, auditing company, IT service provider;
- Public institutions and authorities: e.g. social insurances, courts, tax and criminal authorities, debt collection offices, child and adult protection authorities
- Private companies: banks (e.g. promotion of home ownership), insurance companies (recourse claims)

## 8 Disclosure of data to other parties

---

Schindler PF may disclose personal data of insured persons to third parties, in particular on the basis of statutory provisions (e.g. social insurances, auditing, pension fund expert) or for commissioned data processing (e.g. IT service provider, provider of Pension Fund Portal) or due to official order (e.g. courts, tax authorities). Schindler PF ensures that the legal requirements (including applicable data protection laws) are complied with.

In addition, Schindler PF may, by virtue of legally effective proceedings, such as a search warrant, subpoena or court/administrative order, grant access to any information provided to Schindler PF in order to comply with such proceedings and to protect the rights of Schindler PF. If justified, Schindler PF may provide access to this information in special emergency situations where physical security of the insured person is threatened.

## 9 How long will the data be processed and retained?

---

Schindler PF takes all reasonable steps to ensure that the personal data of insured persons is processed only for the period necessary for the execution of the occupational pension scheme. The data will be retained in accordance with the legal retention and documentation obligations or insofar as Schindler PF is legally obliged to do so or if the legitimate interests of Schindler PF require further retention.

## 10 What rights do insured persons have in connection with the processing of their data?

---

In relation to the processing of their data and in accordance with applicable law, insured persons may be entitled to:

- request Schindler PF to access their personal data stored by the pension fund;
- have their personal data corrected if it is inaccurate or incomplete;
- request the erasure or removal of their personal data where there is no compelling reason for their further processing;
- restrict the processing of their personal data (i.e. to allow storage, but not to allow further processing).

If insured persons wish to make a request for access to their data or if they have concerns about the way Schindler PF collects, uses or discloses their personal data, they can contact the Schindler Pension Fund office, Zugerstrasse 13, 6030 Ebikon, telephone +41 41 445 31 71, e-mail [pk.ch@schindler.com](mailto:pk.ch@schindler.com).

In accordance with applicable law, insured persons may also be entitled to lodge a complaint with the competent supervisory authority.

## 11 How is the data protected?

---

Schindler PF is obliged to keep the personal data of insured persons secure and has implemented appropriate data protection policies and rules as well as technical measures to protect the personal data and safeguard it from unauthorized access, misuse or disclosure, unauthorized modification and unlawful deletion or accidental loss.

## 12 Changes to this Privacy Policy

---

If there is a significant change in the purpose or manner of processing the personal data of the insured persons, this Privacy Policy will be updated in a timely manner and the insured persons will be informed of the changes.

Last updated: Ebikon / Switzerland, March 2022