

Code of conduct for the processing of personal data at Kepler Cheuvreux Switzerland

Switzerland

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Article 1 – Purpose.

- The purpose of this code of conduct is to describe the procedures relating to the processing of personal data by Kepler Cheuvreux with effects in Switzerland.

Article 2 – Scope.

- The measures described in this code of conduct apply to the processing carried out by Kepler Cheuvreux.
- They apply exclusively to the physical persons concerned by the processing described, with the territorial scope of application being processing carried out in Switzerland, as well as processing carried out from abroad with effect in Switzerland.
- List of Kepler Cheuvreux entities responsible for processing personal data:

<b>Kepler Cheuvreux entity</b>	<b>Adress</b>
Kepler Cheuvreux Paris	112 avenue Kleber,75116 Paris, France
Kepler Services SA	Avenue Perdttemps 23, 1260 Nyon, Suisse
Kepler Services SA	P° de la Castellana,52 2°B, 28046 Madrid, Espagne
Ellipsis AM	112 avenue Kleber,75116 Paris, France
Kepler Cheuvreux Invest	112 avenue Kleber,75116 Paris, France

Article 3 – Personal data processed by Kepler Cheuvreux.

- Kepler Cheuvreux uses a number of tools to process personal data. The list of personal data processed, the technical environments in which the processing is carried out, the types of persons concerned, the service providers involved as well as cross-border data exchanges, are detailed in a regularly updated register of processing activities.

- Kepler Cheuvreux may process the following types of personal data :
  - Data relating to the identification of individuals, such as: surname, first name, e-mail address, gender, nationality, national identification number, date of birth, home address.
  - Financial identification data such as: bank details, tax data.
  - Professional identification data such as: job title, business telephone number, business e-mail address.
  - Internet browsing data: cookies, Kepler Cheuvreux website connection log.

#### Article 4 – Purpose of processing and legal basis.

- Kepler Cheuvreux processes the personal data mentioned in article 3 exclusively for the following operational purposes :
  - To ensure the customer relationship is established, particularly in the context of Know Your Customer procedures.
  - To ensure optimum management of customer relations.
  - Subscribing to the services and products provided by Kepler Cheuvreux and ensuring their proper execution.
  - Ensuring the proper functioning of compliance and risk management systems.
  - Deploying the technical and organisational measures necessary to guarantee an adequate level of security for the processing carried out (particularly in terms of information systems and infrastructure).
  - Ensuring that payments and invoicing are properly managed.
  - To ensure proper personnel administration.
  - To analyse its marketing activities in order to improve service and commercial positioning.
- Kepler Cheuvreux processes personal data on the following legal bases :
  - To ensure that the services provided meet the needs expressed by the client.
  - To meet its regulatory obligations.
  - To fulfil its duties as an employer.

#### Article 5 – Technical and organisational means implemented to guarantee the protection of personal data.

- Kepler Cheuvreux undertakes to deploy the following technical and organisational measures in order to guarantee the security of the personal data processed:
  - Measures to ensure the confidentiality, integrity, availability and resilience of processing systems and services at all times;
  - Measures to ensure that means are available to restore the availability of and access to personal data within an appropriate timeframe in the event of a physical or technical incident;
  - Procedures for regularly testing, analysing and evaluating the effectiveness of technical and organisational measures to ensure the security of processing;
  - User identification and authorisation measures;
  - Data protection measures during transmission;
  - Measures to protect data during storage;
  - Measures to guarantee the physical security of the sites where personal data is processed;

- Measures to guarantee the recording of events;
- Measures to ensure system configuration, including default configuration;
- Measures for the governance and management of internal IT and IT security;
- Process and product certification/assurance measures;
- Measures to ensure data quality;
- Measures enabling data portability and guaranteeing deletion;

#### Article 6 – Sharing of personal data.

- Your personal data may be shared with other entities of the Kepler Cheuvreux group, always within the limits of the purposes described in article 4.
- Kepler Cheuvreux may also share your personal data with organisations outside the Kepler Cheuvreux group :
  - Third parties : in the context of the purposes described in article 4, Kepler Cheuvreux may transfer your personal data to certain third party companies of the following types :
    - Issuers ;
    - Third party brokers ;
    - Supervisory authorities ;
    - External auditors ;
  - Service providers Kepler Cheuvreux may also share your personal data with a number of service providers in the following areas :
    - Logistics, IT and infrastructure management ;
    - Marketing and communication services ;
    - Payroll service providers ;
    - Financial service providers (clearing and settlement agents, payment systems, clearing houses, etc.) ;

Each processing of personal data carried out as part of a service is subject to a specific contract between Kepler Cheuvreux (acting as data controller) and the service provider (acting as data processor), so that the latter is committed to processing your personal data to the necessary security standards. The subcontractors of your personal data act exclusively within the framework of the processing strictly necessary for the purposes of the service contract and on the written instruction of Kepler Cheuvreux.

- Other : As part of its regulatory obligations, Kepler Cheuvreux may share your personal data with the relevant supervisory authorities such as regulators or federal bodies, in particular FINMA and the Swiss Federal Data Protection and Information Commissioner.
- As part of the processing described in Article 3, certain personal data may be transferred abroad, either within the Kepler Cheuvreux Group or via its network of service providers. Kepler Cheuvreux undertakes to ensure that such transfers are made to countries recognised as offering an adequate level of protection for personal data, in accordance with Annex 1 of the Data Protection Ordinance (OPDo). In the event of transfers to countries recognised as not

offering an adequate level of protection, Kepler Cheuvreux undertakes to require its service providers to implement appropriate technical and organisational measures in order to guarantee an equivalent level of personal data security.

#### Article 7 – Retention period of personal data.

- Personal data is kept for a period of time that is proportionate to the needs of the processing carried out by Kepler Cheuvreux and to the purposes for which it is processed.
- Personal data processed by Kepler Cheuvreux is kept for a period of up to 10 years, in accordance with the regulatory obligations in force with which Kepler Cheuvreux is required to comply.

#### Article 8 – Rights of data subjects.

- Right of access : any individual may ask the data controller whether personal data concerning him or her is being processed (Art 25 of the LPD law of September 2020). In this context, any individual has the right to access the following information :
  - The identity and contact details of the data controller responsible for processing the said personal data.
  - Details of the personal data processed as such.
  - The purpose of the processing.
  - The period for which the personal data will be kept, or at least the criteria for determining this period.
  - The origin of the personal data.
  - The existence of an automated individual decision, if applicable.
  - The recipients, or category of recipients, to whom the personal data is communicated.

Kepler Cheuvreux reserves the right to refuse, restrict or defer any request for access in accordance with the provisions of Article 26 of the Federal Data Protection Act (LPD).

- Right to the return or transmission of personal data: Kepler Cheuvreux undertakes to return to the data subject, upon request, the personal data concerning him or her in an electronic format, or to transmit it to another data controller if the data subject clearly and explicitly so requests, without charging a fee, unless this operation requires disproportionate efforts. Kepler Cheuvreux reserves the right to refuse any such request in accordance with the provisions of Article 29 of the Federal Data Protection Act (LPD).
- Correction of inaccurate personal data the person concerned by the processing of his/her personal data has the right to have his/her data corrected if it is found to be inaccurate.
- Protection of personality: the data subject may ask Kepler Cheuvreux to refrain from processing personal data. The data subject must specify to Kepler Cheuvreux which of the said processing operations he or she wishes to discontinue.
- You may request to exercise your rights to obtain the information detailed above for the personal data concerning you, by writing to the following address : [Dpo-ch@keplercheuvreux.com](mailto:Dpo-ch@keplercheuvreux.com) .

- Kepler Cheuvreux will process the requests of the persons concerned within the limits provided by the strict framework imposed by the Federal Law on Data Protection (LPD).

Article 9 – Data Protection Advisor.

Kepler Cheuvreux has appointed a personal data protection advisor, who can be contacted at the following dedicated address : [dpo-ch@keplercheuvreux.com](mailto:dpo-ch@keplercheuvreux.com).