



# Privacy Statement SIX Exfeed

This Privacy Statement explains how and why SIX Exfeed (“SIX”) processes personal data of SIX Exfeed Reporting Portal Users.<sup>1</sup>

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## What’s the purpose of this Privacy Statement?

This Privacy Statement explains how and why SIX Exfeed of SIX processes personal data. It applies to all natural persons with whom we come into contact (referred to as “you” in this document). This includes employees, officers, directors, beneficial owners and other personnel of our customers as well as service providers, authorities, and other business counterparties.

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## Who is responsible?

The legal entity listed below is the controller of your personal data and responsible for processing your data.

SIX Exfeed AG  
Hardturmstrasse 201  
8005 Zurich  
Switzerland

Below you will find our EU and UK representatives:

EU representative: SIX Financial Information Deutschland GmbH in Frankfurt (Theodor-Heuss-Allee 108, D-60486 Frankfurt am Main).

UK representative: SIX Financial Information UK Ltd. in London (6 Devonshire Square, Spitalfields, London EC2M 4YE).

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## Why do we process personal data and what categories?

SIX processes personal data about you where:

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<sup>1</sup> Legal or contractual duties to maintain confidentiality to which SIX is subject in relation to the User's personal data are not affected by this Privacy Statement. The websites of SIX may contain hyperlinks to other websites which are not operated or monitored by SIX. Third-party websites are not subject to this Privacy Statement. SIX is not responsible for their content or how they handle personal data.



- It is necessary to enter into a contract or carry out a contract with our customer
- It is necessary to comply with our legal obligations, or
- It is in our legitimate business interests, e.g. for security compliance if you visit our office, or to protect our IT infrastructure.

SIX processed your personal data for the following reasons:

- To undertake corporate marketing
- To enter into contract
- To provide services and products to our customers including any communication required to render them
- To ensure fair and orderly markets
- To receive customer requests and improved services/products accordingly
- To receive, investigate and respond to customer complaints
- To inform customers, suppliers and authorities about incidents and their impacts and resolution
- To manage relationships with our business partners, customers and service providers
- To carry out analyses with the intention to strengthen our relationships and improve the quality of our services and products
- For testing and support purposes
- To operate and maintain our information technology
- To establish, exercise and/or defend legal claims and rights
- To protect, exercise and enforce our rights, property or safety, or to assist our customers or others to do so
- For other purpose

SIX processes in general the personal data such as Name, Address, Tel. Number, Title, and Role etc.

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### **What is the legal basis?**



By processing personal data according to this Privacy Statement, SIX is able to improve the quality of its products and services. Depending from the processing purpose, the legal basis for the processing of your personal data will be one of the following:

- Consent of you
- Contractual Basis
- Legal Obligation
- Legitimate Interest

in each case provided such interests are not overridden by your privacy interests.

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### **Where do we get personal data from?**

We collect data from the following sources:

- Personal data obtained from customers when you
  - Give us contact data for relationship management, sales or any other purpose
  - Send us your data on forms, e-forms, e-mail or by post
  - Send us information for client on-boarding or admission
  - Provide us data to enter into a contract or service level agreement including billing
  - Provide us with data during the performance of our services for issue management, collection of customer experience, service improvement and other legitimate reasons
- Personal data obtained from service providers required to
  - Establish and maintain a contact
  - Enter into and maintain contracts, service level agreements and other types of service descriptions
  - Facilitate billing and payment
  - Monitor and control service delivery to ensure and enhance quality
  - Collaborate on solution design and delivery
- Personal data we receive from other sources
  - Background information from third party providers



- Information from authorities
- Information from publicly available sources

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## **To whom do we disclose your personal data?**

Your personal data may be disclosed to and / or transferred to

- Our business partners (e.g. custodians, correspondent banks) if your data is included in business transactions which need to be processed by them
- Your own organization in connection with issue and problem resolution, contract management, service and billing requests, requests of your compliance office, client relationship management concerns
- The Swiss National Bank (SNB)
- Competent regulatory (e.g. FINMA), prosecuting or tax authorities
- Our auditors and legal advisors involved in or contemplating legal proceedings
- Our technology suppliers that provide support for incident handling
- Other persons where disclosure is required by law

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## **Where do we transfer your data to?**

We may transfer your personal data to SIX entities, regulatory, prosecuting, tax and governmental authorities, courts and other tribunals, service providers and other business counterparties located in countries inside or outside the European Economic Area (EEA), including countries which have different data protection standards to those which apply in the EEA. When we transfer your personal data to service providers or other business counterparties in these countries, we will ensure that they protect your personal data in accordance with EEA-approved standard data transfer agreements or other appropriate safeguards.

SIX reserves the right to disclose personal data to regulatory and supervisory authorities, as well as, pursuant to this Privacy Statement, to Analysis Service Providers. In so doing, SIX will comply at all times with applicable regulations, laws, court orders or official requests.

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## **How long do we keep personal data?**



As a general rule, we keep personal data as long as we have a client relationship. After a client relationship ends, we usually must keep it for a period of 10 years. In cases where the relevant client or counterparty informs us that employment of a certain persons has ceased, the retention period starts from that point in time.

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### **What rights do you have in relation to personal data?**

Users whose personal data is processed within the scope of this Privacy Statement have the following rights:

- to receive **information** on whether SIX may save personal data and what form this personal data may take (which categories of data, recipients or categories of recipients, retention periods for personal data or criteria governing retention periods)
- to request the **rectification** of personal data if it is incorrect
- to request the **deletion** of personal data
- to request **restrictions** on processing personal data
- to receive personal data in a structured, accessible and machine-readable **format** (if available)
- to submit an **objection** to processing, especially for the purpose of direct advertising

The rights specified above may be denied or restricted if the interests, rights and freedoms of third parties take precedence or if processing is necessary to establish, exercise or defend legal claims of SIX.

Queries in relation to processing personal data are to be directed to the Data Protection Officers of SIX:

To exercise your rights with regards to data protection please use [this link](#).

You can also direct your queries to:

SIX Group Services Ltd.  
Data Protection Officer  
Hardturmstrasse 20  
8005 Zurich  
Switzerland  
E-Mail: [dataprotection@six-group.com](mailto:dataprotection@six-group.com)



Users have also the right to make a complaint to the data protection authority responsible for them or in the place where they think an issue in relation to the Data has arisen