

## Investec Bank (Switzerland) AG - Privacy Policy

Your privacy is important to us and we are committed to safeguarding your privacy when visiting our online banking website ("ePortfolio Website"). We take care to protect your personal data collected, processed and used during visits to the ePortfolio Website.

### **Your acceptance of this Privacy Policy ("Policy")**

If you do not agree to this Policy, do not proceed to further web pages of the ePortfolio Website. This Policy may be updated from time to time. We therefore ask you to consult it on a regular basis. The last line of this Policy indicates when it was last updated.

### **What are the purpose and the scope of this Policy?**

Investec Bank (Switzerland) AG ("IBSAG") is committed to safeguarding the personal information that we collect from individuals and corporate entities that use the ePortfolio Website. Accordingly, IBSAG has developed this Policy to describe what type of data and how it will be collected from users of the ePortfolio Website and the purposes for which IBSAG may collect, share or disclose the data. IBSAG also outlines reasonable precautions which are taken to keep your data secure.

This Policy applies to any information obtained by IBSAG via your use of the ePortfolio Website. It is not applicable to any internet websites controlled by third parties not affiliated with IBSAG that the ePortfolio Website may link to. Please review the privacy policies of third party websites as IBSAG is not responsible for and has no influence on the content or the privacy practices of third party websites.

The terms of this Policy are subject to any additional terms and conditions or other contractual terms you have entered into with IBSAG, and any applicable mandatory laws and regulations.

### **What information do we collect from you and for what purpose?**

When you visit the ePortfolio Website, our web server automatically records your IP address, the type of browser software used, and the web pages you actually visit including date and duration. IBSAG will use your personal data only for the purposes of technical administration of the ePortfolio Website as well as client and user administration.

We use your personal data to inform you about our services and products only in line with applicable laws and regulations.

### **How do we collect and store information from you?**

IBSAG logs every attempt to log into ePortfolio using valid credentials, and all activity once you are logged in. This information is kept in a secure database only accessible by authorised IBSAG employees, and helps us manage and improve the usability of the ePortfolio Website, for example, by determining whether there has been any contact between your computer and us in the past and identify the most popular sections of the ePortfolio Website.

In addition, once you are logged in, we use authentication cookies to keep temporary system information about your active session, data which is not required or read after you log out of a session. Please ensure that your computer setting reflects whether you accept cookies or have disabled or deactivated them. You can set your browser to warn you before accepting cookies. The specific instructions can be found in the manual of your browser. Disabling or deactivating of this function on your browser may result in a reduced availability of the services provided by the ePortfolio Website.

All electronic messages sent to and from IBSAG are automatically retained in a distinct journaling system which preserves the evidential weight of the emails. They are protected by adequate legal, technical and organisational measures and may only be accessed in justified cases in line with applicable laws and regulations (e.g. court order, suspicion of criminal conduct, violation of regulatory obligations, material breach of employment contract) to specific persons in defined functions (e.g. Legal & Compliance, Risk). Every step of the process as well as the search criteria used, are logged in an audit trail. All emails are disposed of after the applicable retention period has expired.

**To whom do we disclose information gathered from the ePortfolio Website?**

IBSAG may disclose your information to its employees, agents and third-party service providers inside or outside your country of residence to perform services for IBSAG. The employees, agents and third-party service providers who have access to personal data obtained via the ePortfolio Website are obliged to respect privacy.

When transferring personal data internationally we make sure that we comply with applicable laws and regulations, for example, by entering into agreements which will ensure that the recipients of your information maintain an adequate level of data protection.

We may also disclose your information to competent authorities, such as governmental agencies or regulatory authorities, or other persons in line with applicable rules, orders, official requests, or similar processes as either required or permitted by applicable law.

**Which security measures have been implemented to protect information from you?**

IBSAG uses technical and organisational security measures in order to reasonably protect personal data against unauthorised access, accidental or intentional manipulation, loss and destruction.

**What is to be considered when data is transmitted via the internet?**

The internet is generally not regarded as a secure environment, and information sent via the internet can be accessed by unauthorised third parties, potentially leading to disclosures, changes in content or technical failures. Even if both sender and receiver are located in the same country, information sent via the internet may be transmitted across international borders and be forwarded to a country with a lower data protection level than exists in your country of residence.

You acknowledge that IBSAG will accept no responsibility or liability for the security of your information when transmitted via the internet to IBSAG. In order to protect your privacy we would like to remind you that you may select another means of communication with IBSAG, where you deem it appropriate.

**How do we deal with information from individuals under the age of 18?**

The ePortfolio Website does not seek to collect personal data from individuals under the age of 18. Individuals under the age of 18 should receive permission from their parent or legal guardian before providing any personal data to IBSAG on the ePortfolio Website.

**How can you access or review your personal data?**

Should you have a request regarding the processing of your personal data please send a letter to the following address:

Investec Bank (Switzerland) AG  
Legal & Compliance Department  
P.O. Box  
8022 Zurich  
Switzerland

Last update in July 2012.