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## Privacy Policy for the Investment Services Website

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This website and mobile app when available (the “**Platform**”) provide a portal, or gateway, to the Investment Services Website (the “**Investment Services Website**”) offered by HSBC Private Bank (Suisse) SA.

The Investment Services Website is owned and operated by HSBC Private Bank (Suisse) SA, a Swiss limited company registered in the Trade Register of the Canton of Geneva (Switzerland) under Company Registration Number (IDE) CHE-101.727.921 and with its registered office at 9-17, quai des Bergues, 1201 Geneva (Switzerland). For the purpose of the applicable data protection rules (the “**Applicable Data Protection Rules**”), the data controller (or equivalent role) is HSBC Private Bank (Suisse) SA (referred to as the “**Bank**”, “**we**”, “**us**” or “**our**” in this Privacy Policy for the Investment Services Website). References to “**you**”, “**your**” and “**yours**” are references to the person accessing the Investment Services Website or, where that person is acting on behalf of any accountholder(s), then to the person accessing the Investment Services Website and to the relevant accountholder(s).

We recognise the importance of respecting your information and maintaining its confidentiality. This policy (the “**Privacy Policy for the Investment Services Website**”), together with the terms and conditions applicable to the Platform (the “**Terms and Conditions for the Investment Services Website**”) and any other document referred to in it, sets out how we collect and process your information in connection with the Platform. Please read the following carefully to understand our practices regarding your information and how we will treat it.

This Privacy Policy for the Investment Services Website does not apply to the information that we collect in connection with our banking services. The Bank’s General Terms and Conditions, any other agreement entered into between you and ourselves and our Privacy Policy (the “**General Privacy Policy**”) set out how we collect and process your information in that context. This Privacy Policy for the Investment Services Website supplements the General Privacy Policy. To the extent that there is any conflict between these documents, the order of priority is as follows: (i) our General Terms and Conditions, (ii) our General Privacy Policy and (iii) our Privacy Policy for the Investment Services Website. If you require a further copy of our General Terms and Conditions or of our General Privacy Notice, please contact your Relationship Manager. Our General Privacy Notice is also accessible at the following link: [www.hsbcprivatebank.com](http://www.hsbcprivatebank.com).

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### Information we may collect about you

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We may collect information in order to provide you with access to the Platform and in order to verify you are authorised to do so. We may also collect information during your visit of the Platform, including the pages you view, the links you click and other actions taken in connection with the Platform. We also collect certain standard information that your web browser sends to every website you visit, such as your IP address, browser type, access times and referring website addresses. In addition, if you wish to receive information from us, you will be asked to provide us with personal information, such as your email address, name, address and telephone number. We may also collect demographic information, such as your post code, preferences and interests. We have ensured that third parties with whom we contract to assist us in providing services have agreed to maintain the confidentiality of your data and process your information in line with the instructions that we give them. The contractual relationships entered into with such third parties are structured in accordance with the Applicable Data Protection Rules.

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### Why we process your information

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We process your information for the following purposes:

- ▶ to ensure that you are authorised to access the Platform in accordance with the Terms and Conditions for the Investment Services Website;
  - ▶ to ensure that content on the Platform is presented in the most effective manner for you on your computer (or smartphone or other device for accessing the internet), including by eliminating the need for you to repeatedly enter the same information and by displaying content customised to your interests and preferences;
  - ▶ to perform research and analysis aimed at improving our services;
  - ▶ to provide you with products, services or information that you request from us or to carry out our obligations arising from any contracts entered into between you and us;
  - ▶ to provide you with information on products and services that we feel may interest you (by post, telephone, email or text message), where you have consented to be contacted for such purposes;
  - ▶ to allow you to participate in any interactive features of the Platform, when you choose to do so; and
  - ▶ to notify you about changes to the Platform.
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### Disclosure of your information

Please refer to the Section “Who we might share your information with” of the General Privacy Policy, which is accessible at the following link: [www.hsbcprivatebank.com](http://www.hsbcprivatebank.com)

We intend to achieve a high level of security in the context of the Investment Services Website. For this purpose, we have implemented a multi-factor authentication process involving a username/password and a code transmitted via SMS (or another channel). We cooperate with other HSBC Group entities and third party service providers and their subcontractors (the “**Recipients**”) for purposes of this authentication process. The Recipients will have access to the mobile number you provide us with and will process this information for purposes of the authentication process. Therefore, the Recipients may infer the existence of a bank-client relationship between you and us. The Recipients are bound by confidentiality obligations. The Recipients will store and access your mobile number in and from Switzerland and European Economic Area (EEA) Member States, in particular in Czech Republic and in Ireland, as well as the location in which your telecom service provider is operating. Some of these jurisdictions do not offer a level of data protection which is equivalent to the Swiss data protection regulations. Should you have any further question, you can contact us at the email mentioned in the section “Contact” below.

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### Where we store your information

Please refer to the Section “Transferring your information outside of Switzerland” of the General Privacy Policy, which is accessible at the following link: [www.hsbcprivatebank.com](http://www.hsbcprivatebank.com)

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### Security

We are committed to protecting the security of your information. A variety of security technologies and procedures are used to protect your information from unauthorised access, use or disclosure.

We maintain strict security standards and procedures with a view to preventing unauthorised access to your data by anyone, including our staff. We use leading technologies such as (but not limited to) data encryption, firewalls and server authentication to protect the security of your data. As indicated above, the contractual relationships entered into with any third parties are structured in accordance with the Applicable Data Protection Rules.

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### Third Party Sites

We provide financial products and services through our affiliated companies and branches located worldwide. Privacy and data protection principles vary from one country to another. When you access or link to any website other than the Platform, please read the privacy and data protection statements or agreements issued by such other website to determine the policies that apply to information or data maintained by that website.

Furthermore, the Platform may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates (the “**Third Party Sites**”). If you follow a link to any of these Third Party Sites, please note that these Third Party Sites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit your information to these Third Party Sites.

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### Your rights

Please refer to the Section “Your rights” of the General Privacy Policy, which is accessible at the following link: [www.hsbcprivatebank.com](http://www.hsbcprivatebank.com).

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### Changes to our Privacy Policy for the Investment Services Website

We may change the content or services found on the Platform at any time without notice, and consequently our Privacy Policy for the Investment Services Website may change at any time in the future. Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you.

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### Contact

If you would like further information on any of the information above, please address questions, comments and requests to our Data Protection Officer via email at: [dataprotection.ch@hsbcpb.com](mailto:dataprotection.ch@hsbcpb.com)

We welcome online feedback and we provide various services whereby users of the Platform can provide feedback. Any communication transmitted to us via a public forum or other means, such as a publicly accessible comment on any website or social networking site (a “**Submission**”), is understood to be non-confidential and non-proprietary. We have no obligation with respect to any Submission and may freely copy, reproduce, incorporate, distribute or use such Submission.

