

## **Data Protection Statement regarding the E-Banking Application of Volksbank AG, Schaan**

Dear Sir or Madam  
Dear clients

Volksbank AG places a great deal of emphasis on careful handling, security and confidentiality aspects of your data. Of course this also applies to the e-banking application of Volksbank AG.

Our e-banking application has been specifically designed for our clients to guarantee functionality and security and is based on state-of-the-art technology.

We collect and process your personal data within our e-banking application in compliance with the strict rules of Liechtenstein's banking secrecy and the currently applicable data protection legislation. Therefore, the new data protection provisions set forth in the GDPR (applicable in the EU as of 25 May 2018 and in Liechtenstein presumably as of July 2018) will not bring about any changes for you with regard to security or confidentiality aspects of your data. Rather, your rights in respect of your personal data will be enhanced.

This data protection statement is intended to inform you of the processing of your personal data within our e-banking application and of the related rights that you have.

### **Information on data processing**

Our e-banking application processes personal data that you have provided upon the initiation or in the subsequent course of your business relationship with Volksbank AG and upon installation of the e-banking application.

"Personal data" means any information relating to an identified or identifiable natural person. This can include, for example, the name, date of birth and contact data (master data), your user name and additional identity verification data, authentication data, order data or log data (in particular, IP address, date and time of access, data volume transmitted, browser type, requesting provider).

"Processing" in particular means the collection, storage, adaptation or alteration, use, making available, erasure or destruction of data.

In line with the security concept of Volksbank AG, your personal data is generally not accessible for anyone outside the bank. Any and all data processed by our e-banking application are located on internal servers of the bank in Liechtenstein.

We transmit data to recipients outside the bank only if this is necessary for the provision of our banking services, in particular for carrying out payment transactions. For example, recipients in this connection possibly include other banks or other financial service providers involved in payment transactions. Furthermore, we are under a statutory obligation to process personal data and, where applicable, transmit such data to recipients outside the bank, in particular to domestic and/or foreign authorities and/or courts or external auditors. These recipients may be located in the EEA and in Switzerland, including, in exceptional cases, third countries.

When you use the e-banking application, a list of your usage activities is prepared automatically.

During the use of the e-banking application, temporary and permanent cookies, *i.e.* small data stored on the users' devices, are used. Cookies are conducive to security and/or are necessary to improve the operation of the e-banking application. If you do not want cookies to be stored on your device, you can deactivate the relevant option in the system settings of your browser and/or erase any stored cookies. The exclusion of cookies may result in the restricted functioning of your e-banking application.

Volksbank AG analyses the risks involved with any and all business processes, and such risk analysis also includes a data protection impact assessment.

### **Purposes and lawfulness of data processing**

The data is processed in our e-banking application for the following purposes:

- to enable the use of our e-banking application and to enable us to provide our banking services;
- to guarantee effective client service and/or technical support;
- to provide information on our e-banking application (updates, new features, maintenance);
- to comply with our statutory obligations, in particular under the Banking Act, the Due Diligence Act and the Act on the International Automatic Exchange of Information in Tax Matters.

With regard to the lawfulness of data processing, we primarily rely on the fulfilment of our contractual and statutory obligations to provide banking services and on your specific consent to data processing upon your use of our e-banking application. Furthermore, it is in our interest to guarantee smooth and efficient business operations.

### **Duration of data processing**

This data will in any case be stored as long as the business relationship has not been terminated. Beyond that period, the data will be stored only during the statutory preservation period which is currently 10 years for banks, but this is done only to the extent necessary.

### **Your rights as data subject**

To an extent that is proportionate, you have the right to obtain information on data processing, the right to obtain the rectification of incorrect data, the right to erasure, to restriction of data processing, to data portability, the right to withdraw your consent and to object data processing with regard to the processing of your personal data in the e-banking application of Volksbank AG. The statutory rights and obligations of Volksbank AG remain reserved.

The withdrawal of your consent or objection to the processing of necessary data might result in the fact that Volksbank AG might (no longer) make the e-banking application available or that it might be prohibited from maintaining the business relationship. We will inform you in each individual case, if the exercise of your rights available under data protection legislation might have any effects of this kind.

If you want to discuss any matters with us that are relevant for data protection purposes, please do not hesitate to contact our mentioned data protection officer or your client advisor.

In case of any data protection violation or any danger to your personal data, Volksbank AG will, after having obtained knowledge thereof, become immediately active on its own initiative and submit a report to the data protection authority.

In case of any suspected violation of your data protection rights or if you want to exercise your rights, please do not hesitate to contact any time. In any case you may contact the Liechtenstein Data Protection Office (*Städtle 38, P.O. box 684, 9490 Vaduz; email [info.dss@llv.li](mailto:info.dss@llv.li); +423 236 60 90*) which clarifies matters of relevance for data protection purposes and gives recommendations. Furthermore, you may contact the Princely Court of Justice (*Spaniagasse 1, 9490 Vaduz; telephone: +423 236 60 90; fax: +423 236 65 39*) which punishes deliberate data protection violations.

Upon using our e-banking application, you give your express consent to the further processing of your personal data within the framework of e-banking and as set out above until further notice.

Yours sincerely,

Volksbank AG