

Privacy Policy of Marbling Financial Group AG

1. General provisions

Marbling Financial Group AG ("Marbling" or "we") has committed itself to handling personal data in a transparent and customer-friendly manner. Protecting such personal data is important for us.

This Privacy Policy provides you with an overview of how Marbling handles such personal data. It also informs you of your rights under the Swiss Data Protection Act.

"Personal data" means any information relating to an identified or identifiable person. This includes contact and master data, such as names, telephone numbers, postal addresses, and email addresses. "Processing of personal data" includes any handling of personal data, including but not limited to the procurement, storage, use, modification, disclosure, or deletion of such personal data.

This Privacy Policy is for your information. It does not constitute part of any contract concluded between you and Marbling and may be amended from time to time.

This Privacy Policy is addressed to all interested parties, clients and persons associated with them (e.g. family members).

2. Origin and categories of personal data

Marbling processes personal data which is (1) provided by you (e.g. during a visit, during a consultancy meeting, in the course of providing asset management services, when accessing our websites), (2) publicly available (e.g. in address books and/or the commercial registers), (3) obtained from third parties (e.g. from address brokers and/or credit agencies), (4) received from co-operation and business partners (e.g. from banks).

This personal data is mainly comprised of communication data (e.g. data in written, telephone or electronic correspondence), documentation data (e.g. minutes of consultancy meetings or conversations), registration data (e.g. user name, e-mail), master data (e.g. personal details, authorised representatives), tax and pension data (e.g. information on income and assets), contract data (e.g. information on services used), financial data (e.g. information on assets and their origin, scoring and creditworthiness data within the context of financial services), transaction data (e.g. information on payment transactions within the context of financial services), behavioural and preference data (e.g. visits to websites, interest in services) or technical data (e.g. IP addresses and logs recording the use of our systems).

If you disclose personal data of third parties to Marbling (e.g. family members and authorised representatives in case asset management services, Marbling assumes that you are authorised to do so and that this personal data is correct.

3. Legal basis and purpose of processing

Marbling only processes personal data in accordance with data protection law:

For the conclusion and performance of our contracts

Marbling processes personal data in connection with the initiation of business and the business relationship with you.

To comply with statutory or regulatory requirements

Marbling processes personal data if required by statutory or regulatory requirements.

To safeguard the legitimate interests of Marbling or third parties

Marbling processes personal data to safeguard its legitimate interests (e.g. to initiate and maintain contact or communication, for market research, to develop and manage services, for quality assurance (e.g. for training and education), for advertising and marketing, for investigating or preventing criminal offences or other misconduct, for preventing damage and losses (e.g. to combat fraud and misuse and to conduct internal investigations), to defend against and/or enforce legal claims in proceedings and litigation, to ensure operations and infrastructure (e.g. in the IT sector), to protect persons and assets (e.g. to create visitor lists, access controls or other records), and to manage business and risk (e.g. for business organisation and corporate development) or for compliance with foreign law.

With your consent

We may process your personal data with your agreement.

4. Data security

Marbling processes only such personal data as is strictly necessary. It protects all personal data against loss and misuse (e.g. against access, alteration or disclosure by unauthorised persons). The technical and organisational measures for data security are appropriate and meet stringent requirements (e.g. use of current firewall and anti-virus products, personal passwords with multifactor authentication technologies, as well as encryption and access restrictions, and awareness raising and training of employees). All data protection measures are continuously adjusted to take account of specific hazards. The level of protection is according to the state of the art and corresponds to the type and extent of data processed.

5. Recipients of personal data

Marbling complies with the confidentiality obligations under data protection law and any other regulations (e.g. bank-client confidentiality). These duties apply to all employees and governing officers of Marbling, as well as to any persons working on its behalf in the context of the outsourcing of certain tasks. Personal data may only be accessed within Marbling by person requiring them for the purpose for which they are being processed.

Personal data may be disclosed to third parties if this is necessary to fulfil contractual obligations (e.g. to payees as well as stock exchanges and brokers within the context of asset management services, to comply with statutory or regulatory requirements (e.g. to authorities, courts), to safeguard legitimate interests (e.g. to service providers in the context of outsourcing) or if you have given your consent.

If personal data is disclosed to service providers in the context of outsourcing (e.g. to IT service providers, marketing service providers, providers of communication and printing services, claim handlers), such service providers may only process such personal data to the extent Marbling is authorised to do so. Marbling carefully selects its service providers and contractually obligates them to comply with the applicable duties of confidentiality and to ensure data security.

6. Disclosure of personal data within Switzerland and abroad

The recipients of personal data mentioned in section 5 may be located in Switzerland or abroad. Personal data may therefore be processed anywhere in the world.

In the case of the disclosure of personal data abroad, Marbling warrants that the country in question offers adequate data protection or that adequate data protection is contractually guaranteed with the recipient, unless a disclosure abroad is made in an individual case on the basis of a statutory exception (e.g. for the conclusion and fulfilment of our contracts, for the defence or enforcement of legal claims in proceedings and litigation).

7. Profiling and automated individual decisions

Marbling does not analyse and assess personal data using automated systems to identify characteristics, predict developments and create profiles (so-called profiling).

We do not take any individual decisions based solely on the automated processing of personal data.

8. Retention period

The length of time for which personal data is processed depends on the purpose of processing in section 3. Marbling adheres to statutory or regulatory retention periods, the safeguarding of our legitimate interests (e.g. to contact and maintain contact) and data storage for technical reasons.

9. Rights

You can request information about your personal data processed by us, and, you have the right to object to the processing of your personal data or to request the deletion of your personal data.

However, these rights do not apply without restriction: In particular, statutory or regulatory obligations (e.g. in order to comply with duties to provide access and disclose information) or the safeguarding of legitimate interests (e.g. to defend or enforce legal claims in proceedings and litigation before or by authorities and courts) may make further processing of your personal data necessary in individual cases.

For Marbling to be able to comply with your request for access, you generally will have to submit your request in writing to Marbling with a copy of a valid official photographic identification (e.g. passport, identity card or driving licence).

If your personal data is processed for marketing purposes, your right to opt out also applies to marketing activities (e.g. mailings, newsletters) and to profiling for marketing purposes. You may stop any unwanted marketing activities at any time by informing us of your request.

If the processing of your personal data is based on your consent, you may withdraw this consent at any time. However, any such withdrawal of consent will only apply for the future: any data processed before will not be affected by your withdrawal of consent.

10. Contact

You can contact us with any questions relating to data protection:

Marbling Financial Group AG
Mainaustrasse 30
8008 Zürich
E-Mail: info@marbling.com

11. Version of the Privacy Policy

Marbling reserves the right to change this Privacy Policy at any time. The version published on www.marbling.com is the currently valid version.

Last update: 23 August 2023