

Privacy Policy

Background

This privacy policy of ISP Securities Ltd. ("ISP Sec") explains how ISP Sec processes personal data within the scope of its business activities and your rights in relation to personal data.

ISP Sec protects the confidentiality and security of the personal data that ISP Sec collects and processes. ISP Sec processes data in accordance with the Swiss Data Protection Act ("DSG") and, where applicable, the European General Data Protection Regulation ("GDPR").

Please read this privacy policy carefully.

If you provide ISP Sec with personal data of other persons, please make sure that you are allowed to share this personal data and that this personal data is correct.

1. Controller and responsibility

Responsible for the processing of personal data and thereby the controller, in accordance with this privacy policy is ISP Securities Ltd, Bellerivestrasse 45, 8008 Zurich (@: compliance@ispgroup.com).

2. Definitions

Personal data is all information relating to a specific or identifiable (i.e. identified or identifiable) natural person, such as in particular, but not exclusively name, mailing address, telephone number, e-mail address, date of birth, etc.

Processing means any operation with personal data, irrespective of the means applied and the procedure, and in particular the collection, storage, use, revision, disclosure, archiving or destruction of data.

The processing of data is solely for the *purpose* of carrying out the resulting contractual or pre-contractual relationship.

3. Events and mailings

ISP Sec processes in particular, but not exclusively the following personal data with regard to our events and mailings: first name, surname, home address, telephone number and e-mail address. Optionally, for events and mailings, you can also provide us with information on salutation and additional information, academic titles, company and telephone numbers. ISP Sec may use this personal data for marketing purposes (using any means of communication such as e-mail, social media, post, fax or telephone) to inform you about publications, events, news, services, products, projects, training and/or related information of ISP Sec or third parties that may be of interest to you.

4. Recruitment

ISP Sec collects, stores and processes in particular, but not exclusively the following data from its applicants:

- first name and surname;
- date of birth;
- address;
- curriculum vitae;
- school- university- and job certificates;
- civil status;
- references and other application documents/information submitted by the applicant.

ISP Sec will process personal data, only for the purposes mentioned herein, eg for assessing the candidate's suitability for the job. The applicant agrees that his personal data may, in particular, be processed for the purposes of, personnel administration, accounting and selection decisions.

ISP Sec will ensure that personal and other confidential data mentioned herein, will only be accessed by those employees or representatives of ISP Sec who need to know the information to do their jobs. Employees or representatives of ISP Sec who are entrusted with such data will not disclose it to unauthorized persons and will take all necessary measures to prevent access to such data by unauthorized persons.

With your application to ISP Sec, you expressly consent to the processing of this personal data. Your data will be processed for the purpose of the application procedure and to fulfil legal obligations only.

5. Storage

To the extent required by applicable data protection laws, your personal data will be deleted with respect to the purpose of processing for which they were collected as soon as they are not required anymore to meet such purpose of processing. The storage of your personal data in accordance with the legal storage and documentation obligations remains reserved.

6. Basis for processing your personal data

If required by applicable data protection laws, we request your consent for the processing of your personal data. The consent then constitutes the legal basis for the processing. Furthermore, the legal basis for the processing - depending on the circumstances and the applicable data protection laws - may also lie in the fulfilment of the contract, the implementation of contractual measures or the safeguarding of legitimate interests. Legitimate interests are in particular direct advertising or direct marketing and the safeguarding of network and information security.

7. Your rights

You can revoke/withdraw your consent at any time without affecting the lawfulness of the processing carried out on the basis of the consent given until the revocation/withdrawal. In addition, you have - depending on the circumstances and applicable data protection laws - in particular the right to access free of charge and to correction of your stored personal data. According to individual foreign data protection laws - insofar as they apply - you may be entitled to further rights such as the right to disclosure of or access to your personal data concerned, the right to correction, deletion or restriction of the processing of personal data, the right to object to processing, the right to appeal to a competent supervisory authority and the right to data transmission/portability.

These rights do not apply to personal data that we may or must process for you within the scope of a client activity or that we may or must store for legal reasons.

Concerning revocation, exercise of your other data protection rights as well as further questions, suggestions and comments on the subject of data protection, please contact ISP Sec using the contact details given above or by e-mail at compliance@ispgroup.com.

8. Data transfers to third parties

ISP Sec will not pass on your personal data to third parties unless

- it is necessary to protect your interests;
- it is necessary to maintain or uphold your relationship with ISP Sec;
- it is expressly stipulated by law; or
- you have given your prior consent.

You herewith acknowledge and agree that your personal data (in particular your personal details and contact details) may be processed on a cloud-based platform (or similar) outside of Switzerland and the EU/EFTA. ISP Sec will take all necessary state-of-the-art measures of the Swiss Data Protection Law to protect the data from unauthorized access.

ISP Sec will appoint and is appointing processors to host, maintain, manage and store (e.g. backup and/or cloud storage) your personal data which will process personal data to the extent necessary to fulfill such hosting, maintenance, managerial, backup, and/or related purposes.

9. Security and liability

ISP Sec protects personal data against loss, misuse, unauthorized access, disclosure, modification or destruction by taking appropriate measures. For this purpose, ISP Sec uses appropriate technical and organizational security measures, which are continuously improved in line with technological developments. However, ISP Sec cannot guarantee the absolute security of the data it processes.

10. Final provisions

ISP Sec reserves the right to amend the content of this privacy policy at any time without prior notification. If any one or more sections or parts of a section of this privacy policy shall be found to be illegal or unenforceable in any respect, the validity, legality and enforceability of the remaining provisions shall not in any way be affected or impaired thereby. The invalid, illegal or unenforceable provision(s) shall be replaced by valid provisions which best correspond to the economic purpose of the invalid provisions. Subject to potential mandatory applicable data protection laws, this privacy policy shall be governed by, and construed and enforced in accordance with, the laws of Switzerland, excluding its conflicts of law provisions. Subject to potential (additional) foreign places of jurisdiction which apply by mandatory foreign law, the exclusive place of jurisdiction shall be Zurich 1, Switzerland.

ISP Securities Ltd.

Declaration for applicants

Dear Candidate,

We at ISP Securities Ltd. would like to keep your application documents so that we can come back to you for future vacancies.

This affects in particular, but not exclusively:

- first name and surname;
- date of birth;
- address;
- curriculum vitae;
- school;
- university and job references;
- civil status; and
- references and other application documents/information submitted by the applicant.

Should you not agree with the processing and storage of your personal data, please let us know so that we can delete your documents immediately.