

# **Pension Fund Bosch Switzerland**

## **Privacy statement**

Data protection is a matter of trust, and your trust is important to us. Although we have not changed the way we handle our personal data, we are obliged to inform you in accordance with the requirements of the Swiss Federal Law on Data Protection (DSG) how we handle the personal data of our insured persons and beneficiaries.

It is important to us that you are fully informed about the processing of your personal data.

This data protection declaration gives you an overview of when and what personal data the Pension Fund Bosch Switzerland CHE-104.864.075 (hereinafter either "PKCH" or "we") collects about you, for what purpose the personal data is processed, how this personal data is processed and to whom it may be disclosed. You will also find out what rights you have under applicable data protection legislation in relation to your personal data processed by us and how you can exercise these rights. The policy applies to all personal data processed by us.

By using the Bosch Switzerland Pension Fund website, you consent to the processing of your personal data and accept these data protection provisions.

We reserve the right to adjust this privacy policy from time to time (without prior notice). The current version published on our website applies. The current version of the privacy policy corresponds to the status of August 2023.

## 1. Scope

In principle, this privacy policy applies whenever you contact or have contacted the Bosch Switzerland Pension Fund. This is particularly the case if you:

- visit our website or
- visit us on site.

## 2. Responsibilities and contact

### 2.1 Website operator and owner of the data collection

Pension Fund Bosch Switzerland  
PO Box  
CH-4502 Solothurn

Phone: +41 32 686 3636

E-machine: [info@pk-bosch.ch](mailto:info@pk-bosch.ch)

Website: [www.pk-bosch.ch](http://www.pk-bosch.ch)

### 2.2 Data protection officer:

Libera AG  
Stockerstrasse 34  
CH-8022 Zurich

Phone: +41 43 817 7363

Contact: [Datenschutzberater.PK@libera.ch](mailto:Datenschutzberater.PK@libera.ch)

## 3. Terms

"Personal data" refers to data that relates to an identified or identifiable person, i.e. that allows conclusions to be drawn about that person's identity.

"Personal data requiring special protection" are categories of personal data that are particularly sensitive, which is why their processing may be subject to special requirements. Personal data requiring special protection includes, for example, health data and data relating to criminal or administrative sanctions and social assistance.

In section 7 you will find information on the data that we process within the scope of this data protection declaration.

"Processing" refers to any handling of personal data, in particular obtaining, storing, using, disclosing and deleting.

For further definitions of terms relevant under data protection law, please refer to the relevant data protection laws, in particular the Swiss Data Protection Act (Bundesgesetz über den Datenschutz (DSG); SR 235.1) and the Data Protection Ordinance (Verordnung zum Bundesgesetz über den Datenschutz (VDSG); SR 235.11) and, where applicable, the European Union's General Data Protection Regulation (GDPR).

## 4. Data subjects

In particular, our data processing operations may affect the following individuals ("data subjects"):

- Actively insured individuals who are employed by an employer affiliated with us and, as a result, are covered by an occupational pension plan
- Persons who receive retirement, disability or survivors' benefits
- Third parties who are legally associated with persons who are insured with us
- Contact persons of our affiliated and business partners
- Claimants, liable persons and other involved parties
- Members of our executive bodies

If we process data from third parties that we have received through you, we assume that the person concerned has been informed about the data processing by us and agrees to it.

## 5. Basis for the collection and processing of personal data

Your trust in us to protect your personal data and thus your personality is important to us. We are therefore guided by the following principles.

We transparently disclose to you what personal data we process for what purpose, how long we keep it and how we protect it. We collect and process your personal data carefully, only for the purposes described in this data protection declaration and only to the extent necessary for this purpose and within the framework of the applicable legal provisions. This means: We only process personal data that we have lawfully received and - in those cases where we need to - have a legal basis for the data processing.

A possible legal basis may be your consent or a law.

## 6. Purpose of processing

In the area of mandatory pension provision, we process personal data exclusively to fulfill our legal obligation. In the non-compulsory area, the processing of personal data is governed by the pension contract.

For the above-mentioned purpose, we primarily process the categories of data described below, although this list is not exhaustive. If data changes in the course of time, we keep not only the current status but also the previous status.

We collect and use personal data to the extent that it is required to respond to contact requests.

## 7. Type of processing of personal data

Depending on the occasion and purpose, we process different data from different sources.

### Master data

We refer to the basic data that we require for the processing of our contractual, legal and other relationships as master data. For example, this includes the name, gender, address, date of birth, marital status and social security number of insured persons and beneficiaries.

We receive the basic data from you.

### Financial data

We process salary data from the actively insured persons in order to determine the following values in particular:

- Contribution amount
- Purchase potential
- Benefit amount in the event of risk (death, disability and retirement)
- Retirement assets

The salary data is provided to us by your employer.

In addition, we process bank data for the benefit adjustment as well as, for example, purchases into the occupational pension plan and payment of termination benefits. We receive this data from you.

## **Health data**

In accordance with our regulatory provisions, a health examination for the supplementary area may be required before joining our pension plan. We receive the information required for this from you or from our medical examiner.

In order to clarify the obligation to pay benefits in the event of disability, we can obtain files from the Federal Disability Insurance (usually also contains files from the daily benefits insurance) and the accident insurance. In addition, we can make inquiries with your employer.

It may happen that your health becomes the subject of legal proceedings, which is why we can also obtain files from lawyers and courts.

## **Information on social assistance or criminal and administrative sanctions**

If you make use of social assistance measures or if you are subject to administrative or criminal sanctions, we will receive information in this regard from the social welfare office, the debt collection office or other competent authorities, insofar as this is relevant for us (payment of a retirement benefit to the debt collection office or similar).

## **Communication data**

When you contact us, we process your communication data (address, e-mail address, telephone number, etc.).

We receive this data primarily from you, but it may also be provided to us by third parties such as the Swiss Post (address updates), municipal offices or by employers and contractual partners.

## **Other data**

Information about relationships with third parties who are also affected by the data processing is part of this data, e.g. partnership and children in the case of beneficiary declarations or children's pensions.

We may receive personal data from authorities and offices of all kinds (unemployment insurance, tax authorities, supplementary benefits, etc.).

In addition, we may obtain knowledge of civil law matters for various processes (e.g. extract from the land register, will, divorce). However, we receive these documents exclusively from you or your descendants.

## **7.1 Automated individual decisions**

According to the Data Protection Act, automated, i.e. purely computer-based and without the intervention of an employee, individual decisions must be identified. Depending on the process, such automated individual decisions can be made in the occupational pension plan. Such automated decisions are marked by us. You can also assert your rights in accordance with section 12 with regard to these automated individual decisions.

## **7.2 Visitors to the website of the Bosch Switzerland pension fund**

No visitor data is stored when visiting the PKCH website.

## **7.3 Interested parties and customers**

In the context of a contact request to PKCH, we collect the following personal data from you in particular: First name, last name, address including house number, postal code and place of residence, telephone number (optional), e-mail address and your message.

We process this personal data for the following purposes:

- to respond to your inquiry.

You have the possibility to object to this processing at any time.

## **7.4 Building**

If you visit us on site, at most video recordings are made by us for the security of persons, buildings and objects. During the visit, your contact details will be recorded, your identity (e.g. by means of ID or passport) will be checked, your access data (date, time) will be stored and, if necessary, video recordings will be made by our surveillance cameras in which you can be recognized.

## 8. Transmission to third parties

Your personal data will not be disclosed, sold or otherwise transferred to third parties, unless this is necessary for the purpose of contract execution or for the fulfillment of our legal duties or you have expressly consented. In addition, data may be transferred to third parties if we are required to do so by law or by enforceable governmental or court order. Third parties within the meaning of this provision also include all companies of the Bosch Group.

Our associates have access to your personal data to the extent necessary for the processing purpose and the activities of the associates concerned. The associates act according to instructions and are bound to confidentiality and secrecy when handling your personal data.

Furthermore, the following institutions may gain knowledge of your data:

### Authorities and offices

It may happen that we disclose personal data of you to authorities and agencies due to legal obligations (unemployment insurance, supplementary benefits, social welfare office, specialist office in case of neglect of maintenance obligation, tax authority).

### Courts

In the event of disputes under social security law or family or inheritance law, it may be necessary for us to disclose data to the relevant court.

### Accredited pension actuary

Your personal data will be disclosed to the occupational benefits expert as required by law. You can find out who performs this activity for us in the annual report.

### Auditor

Your personal data will also be disclosed to the auditors as required by law. You can find out who performs this activity for us in the annual report.

### Financial institutions

We disclose personal data to banks, other pension funds and vested benefits institutions in the event of entry/exit, advance withdrawals, benefit payments etc.

### Service provider

We may disclose your personal data to third parties if we want to use their services ("order processors"). This primarily involves the following areas:

- Lawyer/legal advice
- IT services

We work primarily with service providers in Germany. We disclose to the service providers the data required for their services and ensure through our selection and suitable contractual agreements that data protection is also observed by the service providers during the entire processing period.

## 8.1 Data transfer abroad

In principle, personal data is processed by us in Switzerland and may be stored on a server in Germany. As explained above, not only we process your personal data, but also our service providers. We contractually ensure that your data is not disclosed outside of Switzerland or the EU or the EEA region, even by our service providers. However, using the latest technologies (e.g. cloud solutions), there is a residual risk that your data will reach outside Switzerland or the EU or EEA area. The respective countries may not have laws that protect your personal data to the same extent as in Switzerland or the EU or EEA area (e.g. USA). We therefore take contractual precautions (or require our service providers to take such precautions) to contractually compensate for the weaker legal protection. For this purpose, we generally use the standard contractual clauses issued or recognized by the European Commission and the Swiss Data Protection and Information Commissioner (EDÖB) (for more information and a copy of these clauses, see Standard contractual clauses for controllers and processors in the EU/EEA ([europa.eu](http://europa.eu)), unless the recipient is already subject to a legally recognized set of rules for ensuring data protection.

## **9. Technologies used**

### **9.1 Server log file**

The page views are recorded in a log file of the web server. You can find out the exact details on the homepage of our hosting provider: [www.cyon.ch/support/a/speicherung-und-aufbewahrung-von-log-daten](http://www.cyon.ch/support/a/speicherung-und-aufbewahrung-von-log-daten)

### **9.2 Cookies**

When you visit our web pages, only functional cookies are used so that we can provide our home page.

### **9.3 Contact form**

When using our contact form on our website, the transmission of data is voluntary and constitutes consent to the processing of your personal data.

Entries made in the form will be forwarded internally to the appropriate persons and stored by us as explained in section 11 in case of follow-up questions.

### **9.4 Google Analytics**

We do not use Google Analytics for user analysis.

## **10. Data security**

We treat your data confidentially and take both technical (encryption, pseudonymization, logging, access restrictions, regular backups, etc.) and organizational (instruction and training of employees, confidentiality agreements, etc.) security measures to maintain the confidentiality, integrity and availability of your personal data and to protect it against unauthorized or unlawful processing.

If the relevant area is under our control, we protect your data transmitted via our websites by means of suitable encryption mechanisms.

Our web pages can only be accessed via <https://>, i.e. TLS encrypted. This ensures a secure transmission of the data you enter.

## **11. Duration of data storage**

We store personal data for as long as is necessary for the fulfillment of the purpose pursued or legal obligations. A storage period deviating from this may result from legal storage and documentation obligations, as well as for reasons of preservation of evidence or the avoidance of a limitation period for legal claims.

## **12. Data subject rights**

In order for you to retain control over your personal data, you have the right, within the framework of the data protection law applicable to you (DSG, VDSG or DSGVO), to request the following from PKCH at any time:

- information about the processing of your personal data;
- correction of your personal data;
- deletion of your personal data;
- restriction of the processing of your personal data;
- release of your personal data in a structured, common and machine-readable format.

You have the right at any time to refuse to give your consent or to revoke consent that has already been given.

If we inform you about an automated decision (section 7.1), you have the right to request a review of the respective decision by a natural person.

Please note, however, that we reserve the right to assert the restrictions provided for by law on our part. For example, if we are obliged to retain or process certain data, have an overriding interest in doing so (insofar as we are entitled to rely on this) or require it for the assertion of claims. If you incur costs, we will inform you in advance.

The exercise of the above rights usually requires that you clearly prove your identity. To exercise your rights, you may contact us as follows: You must send us your request in writing, along with a copy of an identity document (if your identity is not otherwise clear or can be verified). You can do this by e-mail ([www.pk-bosch.ch](mailto:www.pk-bosch.ch)), scanning the copy, or by letter to the address indicated in section 2.2.

Every data subject also has the right to enforce his or her claims in court or to file a complaint with the competent data protection authority. The competent data protection authority in Switzerland is the Federal Data Protection and Information Commissioner ([www.edoeb.admin.ch](http://www.edoeb.admin.ch)).