Swiss Finance Corporation Limited

Privacy Notice

1. Who we are

Swiss Finance Corporation Limited is a company registered in England and Wales under company number 02278043. Our registered office is 58 Grosvenor Street, London, England, W1K 3JB.

Swiss Finance Corporation Limited is authorised and regulated by the Financial Conduct Authority under firm reference number 142903.

In this notice, “SFC”, “we”, “us” and “our” means Swiss Finance Corporation Limited, including the trading names, websites and services operated by it.

We are the controller of the personal data we collect and use for the purposes described in this notice. This means we decide why and how your personal data is used.

You can contact us about this notice, or about the personal data we hold about you, using the details below:

Privacy contact: Paul Hayward (Director & Data Privacy Lead)
Email: paul.hayward@sfc-uk.com
Telephone: +44 20 7412 0500
Post: Swiss Finance Corporation Limited, 58 Grosvenor Street, London, England, W1K 3JB

2. What this notice covers

This notice explains how we collect, use and share personal data relating to:

- clients and prospective clients;
- directors, officers, beneficial owners, trustees, partners, employees, traders, authorised representatives, signatories and other individuals connected with corporate, trust, fund, partnership or institutional clients;
- individuals who use or are authorised to use our trading, custody, advisory, investment or other services;
- contacts at counterparties, banks, brokers, exchanges, custodians, payment providers, suppliers, professional advisers and other business contacts;
- visitors to our websites and premises; and
- individuals who contact us with enquiries or complaints.

This notice also applies to individuals who send us recruitment enquiries or apply for roles with us.

This notice does not form part of any contract with you. It is provided to explain how we use personal data and what rights you have.

3. Personal data we collect

The personal data we collect depends on your relationship with us and the services you use or enquire about. It may include:

Identity and contact details

- name, title, date of birth, gender, nationality and country of residence;
- home, business and correspondence addresses;
- email addresses and telephone numbers;
- passport, driving licence, national identity card, residence permit and other identification details;
- photographs and copies of identification documents.

Client, account and relationship information

- client number, account details, usernames and access credentials;
- your role or relationship with a corporate, trust, fund, partnership or institutional client;
- information about authorised signatories, traders, representatives, beneficial owners and persons with control;
- suitability, appropriateness, client categorisation, investment knowledge and experience, investment objectives and risk-related information, where relevant;
- source of funds, source of wealth, financial position, bank account information, payment details and settlement instructions;
- tax residence, tax identification numbers and information required for tax reporting;
- information provided in account opening forms, due diligence questionnaires, declarations and other client documentation.

Transaction and service information

- orders, trades, payment instructions, confirmations, statements, margin, collateral, settlement, custody and portfolio information;
- records of products and services requested or provided;
- communications with you, including emails, letters, meeting notes and messages;
- telephone and electronic communications recordings, where calls or electronic communications are recorded for regulatory, monitoring, training, dispute resolution or record-keeping purposes.

Financial crime, sanctions and regulatory information

- identity verification results;
- politically exposed person status and connected-person information;
- sanctions, watchlist and adverse media screening results;
- information relevant to anti-money laundering, counter-terrorist financing, fraud prevention, market abuse, sanctions, tax, regulatory reporting and other compliance checks.

Website and technical information

- IP address, device information, browser type, operating system and website usage information;
- cookie and similar technology data;
- online enquiry form information and marketing preferences.

Premises and security information

- visitor logs and meeting records;

Special category data

We do not usually need to collect special category personal data, such as health data, biometric data, racial or ethnic origin, religious beliefs, political opinions, trade union membership or sexual orientation.

However, we may process limited special category data where necessary, for example:

- health or disability information if you ask us to make an adjustment or provide assistance;
- information revealed incidentally through due diligence, sanctions, politically exposed person or adverse media checks;
- special category information included in recruitment or employment-related information.

We will only process special category data where data protection law allows us to do so, including where it is necessary for legal claims, substantial public interest reasons, regulatory compliance, employment law purposes, vital interests or where you have given explicit consent.

4. How we collect personal data

We collect personal data from:

- you directly, including when you complete forms, contact us, request information, open an account, give instructions or use our services;
- corporate clients, funds, trusts, partnerships, employers or other organisations you are connected with;
- introducers, advisers, brokers, counterparties, banks, custodians and other service providers;
- identity verification, credit reference, fraud prevention, sanctions screening, politically exposed person screening and adverse media providers;
- public sources, including Companies House, insolvency registers, regulatory registers, sanctions lists, court records, public websites and professional networking platforms;
- regulators, tax authorities, law enforcement agencies, courts, exchanges, trading venues and clearing or settlement systems;
- our websites, systems, cookies and similar technologies.

5. Why we use personal data and our lawful bases

We only use personal data where we have a lawful basis to do so. Most commonly, we use personal data because it is necessary:

- to take steps before entering into a contract with you or to perform a contract with you;
- to comply with legal and regulatory obligations;
- for our legitimate interests or those of a third party, provided those interests are not overridden by your rights and freedoms;
- where you have given consent; or
- in limited cases, to establish, exercise or defend legal claims, protect vital interests, or meet other conditions allowed by law.

The table below summarises the main ways we use personal data.

Purpose	Personal data used	Lawful basis
To assess enquiries, open accounts and onboard clients	Identity, contact, role, account, financial, corporate ownership, source of funds/wealth and due diligence information	Contract steps; legal and regulatory obligations; legitimate interests in assessing and managing client relationships
To verify identity and carry out AML, sanctions, fraud, PEP, adverse media and other financial crime checks	Identity documents, beneficial ownership, screening results, public-source data, financial crime information	Legal and regulatory obligations; legitimate interests in preventing fraud, crime and misuse of our services
To provide financial, trading, execution, custody, payment, investment advisory, asset management, platform and related services	Account, transaction, payment, trading, communications, settlement, custody and portfolio information	Contract performance; legal and regulatory obligations; legitimate interests in providing and administering services
To assess suitability, appropriateness, client classification, risk, credit, margin, counterparty exposure and regulatory eligibility	Financial position, experience, investment objectives, knowledge, risk profile, corporate information and transaction history	Legal and regulatory obligations; contract performance; legitimate interests in managing risk
To process transactions, orders, payments, confirmations, reporting, settlement, custody and reconciliations	Transaction, bank, payment, account, trading, custody and counterparty information	Contract performance; legal and regulatory obligations; legitimate interests in operating our business
To communicate with you about your account, services, changes to terms, regulatory notices, statements and service updates	Identity, contact, account and communications data	Contract performance; legal and regulatory obligations; legitimate interests in managing our relationship
To keep records of instructions, calls, electronic communications, meetings, transactions and decisions	Communications, call recordings, transaction records, account records and meeting notes	Legal and regulatory obligations; legitimate interests in record-keeping, quality control, training and dispute resolution
To comply with laws, regulations, FCA rules, AML and sanctions requirements, tax reporting, accounting, audit, market abuse, transaction reporting and requests from regulators or authorities	Any relevant personal data depending on the requirement	Legal and regulatory obligations; legitimate interests in compliance and risk management
To prevent, detect and investigate fraud, financial crime, cyber incidents, unauthorised access, misuse of services, complaints or disputes	Identity, contact, technical, transaction, communications, screening and account data	Legal and regulatory obligations; legitimate interests in protecting clients, SFC and the financial system
To manage complaints, legal claims, regulatory enquiries, investigations and enforcement matters	Account, transaction, communications, due diligence, records and relevant supporting information	Legal and regulatory obligations; legitimate interests in protecting our rights and responding to disputes
To manage IT systems, cybersecurity, business continuity and premises security	Technical data, access records, visitor records, [CCTV images if used], audit logs and account access data	Legal and regulatory obligations; legitimate interests in keeping systems, premises and data secure
To manage supplier, counterparty, professional adviser and business relationships	Business contact details, communications, due diligence and payment information	Contract performance; legitimate interests in operating and managing our business
To send marketing, event invitations, market commentary or information about our services	Name, business contact details, marketing preferences, role, services used or requested	Legitimate interests; consent where required by law;

		compliance with direct marketing rules
To operate and improve our websites and online services	Cookie data, device data, IP address, website usage and enquiry information	Consent for non-essential cookies; legitimate interests for essential website security and functionality
To consider recruitment enquiries or applications	CV, contact details, application information, references, interview notes and right-to-work information	Contract steps; legal obligations; legitimate interests in recruitment; explicit consent where required for special category data
To support a sale, transfer, restructuring or corporate transaction involving our business	Relevant client, supplier, contract and business records	Legitimate interests in managing corporate transactions; legal obligations where applicable

6. Where we need personal data from you

Some personal data is required by law, regulation or contract. For example, we may need identity, address, beneficial ownership, source of funds, tax, bank account, sanctions and due diligence information before we can open or maintain an account or provide services.

If you do not provide information we reasonably require, we may be unable to:

- assess or accept you as a client;
- open, operate or maintain an account;
- provide trading, payment, investment, custody or other services;
- process orders, payments or transactions;
- comply with our legal and regulatory obligations; or
- continue our relationship with you.

7. Marketing and your right to object

We may use your business contact details to send information about SFC, our services, market updates, events or other content we think may be relevant to you.

We will only send electronic marketing where permitted by applicable direct marketing rules. For example, we may rely on legitimate interests for business-to-business marketing where lawful, and we will obtain consent where required, including where marketing is sent to individuals, sole traders or certain partnerships and no lawful soft opt-in applies.

We do not sell your personal data for marketing purposes.

You have an absolute right to object to direct marketing at any time. You can opt out by:

- using the unsubscribe link in our marketing emails;
- contacting us at Sanjay.amin@sfc-uk.com; or
- telling your usual SFC contact.

We may keep a limited suppression record to make sure we do not send you marketing after you have opted out.

Service, regulatory and account communications are not marketing. We may still need to send these even if you opt out of marketing.

8. Cookies and similar technologies

Our website use cookies and similar technologies. Some are necessary for the website to work properly or to keep it secure. Others, such as analytics or marketing cookies, will only be used where we have obtained any consent required by law.

The categories of cookies we use are:

(1) 'strictly necessary' cookies: these cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. This category cannot be disabled.

(2)'analytical' / 'performance' cookies: these cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies do not collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works. By using our website, you agree that we can place these types of cookies on your device.

(3)'functionality' cookies: these cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites. By using our website, you agree that we can place these types of cookies on your device.

You can control how cookies are placed on your device from within your own browser. You can also delete existing cookies from your browser. However, refusing and/or deleting cookies may mean some sections of our site will not work properly

9. Who we share personal data with

We share personal data where necessary for the purposes described in this notice. Recipients may include:

- banks, brokers, dealers, counterparties, trading venues, exchanges, clearing houses, settlement systems, custodians, payment providers, e-money institutions and other financial market infrastructure providers;
- platform providers, software providers, IT support providers, cloud hosting providers, cybersecurity providers, telecommunications providers and data storage providers;
- identity verification, credit reference, sanctions screening, fraud prevention, politically exposed person screening and adverse media providers;
- payment processors, correspondent banks, banking partners and financial technology partners;
- introducing brokers, professional advisers, investment managers, fund managers, trustees, administrators, nominees, agents and representatives involved in providing services;
- auditors, accountants, lawyers, insurers, consultants and other professional advisers;
- regulators, including the FCA, HMRC, tax authorities, law enforcement agencies, courts, tribunals, ombudsmen, government bodies and other competent authorities;
- counterparties, clients, suppliers and other persons where disclosure is needed for a transaction, service or relationship involving you;
- prospective buyers, investors, funders or advisers in connection with any sale, merger, acquisition, restructuring, transfer of business or similar transaction involving SFC.

Some recipients act as our processors and may only use personal data on our instructions. Others, such as banks, brokers, regulators, payment providers and professional advisers, may act as independent controllers and will be responsible for their own use of personal data.

We require service providers who process personal data for us to protect it appropriately and to use it only for authorised purposes.

10. International transfers

We are based in the UK. Some of our service providers, counterparties, financial institutions, platforms or technology providers may process personal data outside the UK.

Where we transfer personal data outside the UK, we will do so in accordance with applicable data protection law. This may include relying on:

- a UK adequacy regulation, where the destination country is considered to provide an adequate level of protection;
- the UK International Data Transfer Agreement;
- the UK Addendum to the EU Standard Contractual Clauses;
- standard contractual clauses approved under applicable EU data protection law, where the EU GDPR applies; or
- another lawful transfer mechanism or exception.

The countries to which personal data may be transferred include the EEA and United States.

You can contact us for further information about international transfers and the safeguards we use.

11. How long we keep personal data

We keep personal data only for as long as necessary for the purposes for which it was collected, including to meet legal, regulatory, accounting, tax, reporting, audit, complaints and legal claim requirements.

Our retention periods vary depending on the type of data and the reason we hold it. As a guide:

- client, account opening, KYC, AML, sanctions, tax, transaction, trading, payment, custody, advisory, communications and regulatory records are normally kept for **seven years** after the end of the client relationship, account closure, transaction completion or other relevant event, unless a longer or shorter period is required by law or regulation;
- records relevant to complaints, disputes, investigations or legal claims may be kept for longer, until the matter is fully resolved and any relevant limitation periods have expired;
- prospective client and enquiry records are normally kept for **six months** after the last meaningful contact, unless we have a lawful reason to keep them longer;
- marketing records are kept until you opt out or we decide they are no longer useful, and suppression records may be kept to ensure your opt-out is respected;
- website cookie data is kept for the periods set out in our Cookie Policy;
- recruitment records are normally kept for **six months** after the recruitment process ends, unless we have agreed to keep your details for longer or need them for legal reasons;

When personal data is no longer needed, we will delete, anonymise or securely archive it.

12. Automated decision-making

We do not make decisions about you based solely on automated processing that produce legal or similarly significant effects.

We do not use any personal data that we obtain for the purposes of making automated decisions.

We may use automated tools to help with identity verification, sanctions screening, fraud prevention, risk monitoring, transaction monitoring or cybersecurity. These tools may generate alerts or risk indicators, but material decisions are reviewed by appropriate personnel.

13. Keeping personal data secure

We use appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

These measures may include access controls, confidentiality obligations, staff training, system monitoring, secure storage, encryption or other security controls appropriate to the nature of the data and the risk.

We limit access to personal data to those who have a business need to access it. We also require relevant service providers to protect personal data and to notify us of security incidents where required.

If a personal data breach occurs and we are legally required to notify you or a regulator, we will do so.

14. Your rights

Subject to certain conditions and exemptions, you have the following rights in relation to your personal data:

- **Access:** to request a copy of the personal data we hold about you.
- **Rectification:** to ask us to correct incomplete or inaccurate personal data.
- **Erasure:** to ask us to delete personal data in certain circumstances.
- **Restriction:** to ask us to restrict our use of personal data in certain circumstances.
- **Portability:** to receive certain personal data in a structured, commonly used and machine-readable format and, where technically feasible, have it transmitted to another controller.
- **Objection:** to object to processing based on legitimate interests in certain circumstances.
- **Direct marketing objection:** to object to direct marketing at any time.
- **Withdrawal of consent:** where we rely on consent, to withdraw that consent at any time. This will not affect processing carried out before consent was withdrawn.
- **Automated decision-making:** to rights relating to solely automated decisions that produce legal or similarly significant effects, if such processing applies.

You can exercise your rights by contacting us at paul.hayward@sfc-uk.com.

We may ask for information to confirm your identity before responding. We will usually respond within one month, but this may be extended where the request is complex or where we have received a number of requests. We will tell you if an extension is needed.

Your rights are not absolute. For example, we may need to continue holding or using certain personal data to comply with legal or regulatory obligations, establish or defend legal claims, prevent fraud or maintain regulatory records.

15. Accuracy of your personal data

Please tell us if your personal data changes or if you believe the information we hold about you is inaccurate or incomplete.

This is particularly important for contact details, tax status, authorised signatories, beneficial ownership, bank details, source of funds, source of wealth and any other information relevant to account operation, transactions or regulatory compliance.

16. Complaints

Please contact us first if you have concerns about how we use your personal data. We will investigate and respond to you.

You can contact us at:

Email: Paul Hayward – paul.hayward@sfc-uk.com
Post: Swiss Finance Corporation Limited, 58 Grosvenor Street, London, England, W1K 3JB
Telephone: +44 20 7412 0500

You also have the right to complain to the Information Commissioner's Office, the UK data protection regulator.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 0303 123 1113

The ICO also provides an online complaint form on its website.

17. Changes to this notice

We may update this notice from time to time. The latest version will be available on our website.

Where changes are significant, we will take reasonable steps to bring them to your attention, for example by email, website notice or other appropriate communication.

18. Accessibility

Please contact us if you would like this notice in another format, such as large print, audio or another accessible format.