

As of May 2018

Privacy Notice

The protection of your personal data is of particular importance to us. We process your data solely on the basis of the data protection provisions. This applies regardless of whether you are a member of a committee or working group of the Liechtenstein Bankers Association (LBA) as an employee of a member bank, are a business partner or service provider of the LBA, or simply use any of our wide range of information offerings. With this privacy notice, we would like to give you a brief overview of the processing of personal data maintained at the LBA and the resulting rights under the provisions of the new European Union General Data Protection Regulation (GDPR).

Within the scope of our work as an interest group and as a lobbying organisation, we rely on the processing of personal data that is necessary for the admission of new association members, for the administration of membership and related tasks, for participation in LBA committees and working groups or external representative functions, or for public affairs. The data used in these contexts is primarily business contact information and addresses.

To protect personal data, we take all necessary organisational, contractual, and technical measures to ensure that data protection provisions are observed and that the data processed by us is protected against accidental or intentional manipulation, loss, destruction, or access by unauthorised persons.

If you have any questions regarding individual data processings or wish to exercise your rights, please contact us:

Liechtenstein Bankers Association
P.O. Box 254
Austrasse 46
FL-9490 Vaduz
Phone: +423 230 13 23
info@bankenverband.li

What data is processed (categories of data) and from what sources (origin)?

In principle, we collect and process personal data provided by you, in particular data that we receive within the scope of the work of our association from our members, their representatives and employees, from contact persons in the context of external representation functions, or on the basis of personal contact, the fulfilment of contracts, e.g. with service providers and suppliers, the registration for events, or the placement of orders for information material. As to the extent necessary in order to provide our services, personal data may be obtained from third parties or processed from publicly accessible sources (e.g. press, internet) in the context of public affairs.

Relevant personal data collected and processed may be in particular information about persons (e.g. first name, surname, possibly date of birth, nationality etc.) as well as address and contact data (e.g. business address, telephone number, e-mail address), information about the professional background (e.g. job title, professional function, possibly career background, relationships and contacts) and information on personal contact or electronic communication (e.g. date and occasion of the contact, content discussed, copies of correspondence, event registrations).

For what purposes and on what legal basis is your data processed?

We process the aforementioned personal data in accordance with the data protection regulations

- *for the performance of contractual obligations in accordance with Article 6(1)(b) GDPR*

The processing of personal data is carried out in order to provide our services and for the provision of our association obligations (admission and administration of a membership with the LBA) and in the context of the performance of contracts with third parties, service providers, and suppliers. The purposes of our association are based on our Articles.

Our tasks are in particular:

- the assertion and representation of the rights and interests of the banking services sector
- the engagement in self-regulation, in particular in order to protect the financial centre, creditors and investors
- the preservation and promotion of Liechtenstein as a banking and financial centre;
- the promotion of professional training and continuing education in the banking industry

- *for the purposes of our legitimate interests or those of third parties in accordance with Article 6(1)(f) GDPR*

To the extent necessary, we process your data to protect our legitimate interests or those of a third party for specifically defined purposes (e.g. to assert and represent the rights and interests of our members to promote the Liechtenstein banking and financial centre; to inform members; to participate in forming opinions in politics, administration, and the general public and to maintain relations with decision-makers in the political sphere and a dialogue in relation to political processes; to assert legal claims and defence in legal disputes; and to market our events). If your contact data is collected in the context of an event, we store that data as part of the event management and to enter into contact with you again in connection with future events.

- *on the basis of your consent in accordance with Article 6(1)(a) GDPR*

To the extent that you have given us your consent to process personal data for specific purposes (e.g. to receive information material), the data will be processed on this legal

basis. Any consent granted may be revoked at any time without any formal requirements. This also applies to the withdrawal of declarations of consent that are granted to us prior to the entry into force of the GDPR, i.e. before 25 May 2018. Please note that the withdrawal of declarations shall only have effect for the future. Any processing that was carried out prior to the withdrawal shall not be affected thereby. The withdrawal also has no influence on any data processed on another legal basis.

Who has access to the personal data and for how long is it stored?

In principle, only those employees of the LBA Secretariat who require your data in order to fulfil our association's purposes have access to it. In addition, in the context of the association's work as a interest group, knowledge of your personal data may be obtained by members' employees through their work in LBA committees or working groups or by external bodies when performing external representation functions (e.g. sending information to e-mail distribution lists, Doodle surveys, etc.). In the context of public affairs, third parties may be recipients of personal data in individual cases for the purpose of recommendations or to maintain contacts.

While complying with data secrecy, LBA service providers, that process data on behalf of LBA, may also gain access to personal data in order to fulfil the purposes set out in point 2. In particular, the LBA has outsourced its IT infrastructure and accounting to a service provider (processor). Processing by these services providers is governed by a GDPR data processing contract, obliging them to comply with data protection provisions.

In principle, we process and store personal data only as long as necessary in relation to the purposes for which they were collected or otherwise processed. In the context of LBA membership, we store the personal data of our members, their representatives, and their employees for the entire duration of the undertaking's LBA membership. If the data is no longer required for lobbying purposes or to protect our legitimate interests (achievement of purpose) or if consent once given is withdrawn, the data will be deleted immediately, unless its – time-limited – storage is still necessary to comply with legal retention periods.

What data protection rights do you have?

With regard to the personal data concerning you, you are entitled to the data protection rights under Article 7 GDPR and Articles 15 to 21 GDPR. You have the right of data access and may request *confirmation* as to whether and to what extent personal data concerning you is processed. You have the right to *rectification* of incorrect or incomplete personal data concerning you and to *erasure* of your personal data if the purpose is achieved or consent is withdrawn, or to *restriction* of the processing thereof. You also have the right to *withdraw* your *consent* to the processing of your personal data for one or more specific purposes at any time if the processing is based exclusively on your explicit consent. Furthermore you have the right to *data portability* and the right to *lodge a complaint* with the competent supervisory authority.

The contact details of the Liechtenstein Data Protection Office are:

Liechtenstein Data Protection Office
Städtle 38
P.O. Box 684
FL-9490 Vaduz
Phone: +423 236 60 90
E-mail: info.dss@llv.li

Information on your right to object

You have the right to object, on grounds relating to your particular situation, at any time and without any formal requirements, to processing of personal data concerning you which is for the purposes of legitimate interests. In addition, you have the right to object without any formal requirements to the use of personal data for marketing. If you object to processing for direct marketing purposes, we will no longer process your personal data for such purposes.

If you object to the processing of your personal data, we will no longer process personal data concerning you unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights, and freedoms

The current version of this privacy notice can be accessed at any time on the LBA website at <https://www.bankenverband.li/Privacy Notice>.