



Privacy Policy

Gestrust SA

Scope

This Privacy Policy applies if you are a customer, prospect, visitor to our website, partner, service provider, employee and/or candidate in the context of a job application at Gestrust SA ("Gestrust" hereinafter).

Preamble

At Gestrust, we are committed to protecting your Personal Data in accordance with applicable data protection laws and regulations.

The purpose of this Privacy Policy is to inform you how Gestrust, as a Data Controller ("we", "us" or "our" hereinafter) uses the Personal Data (as defined below) that we process about you.

"Personal Data" means any personally identifiable information that can be linked directly or indirectly to an entity or a natural person, such as a name, email address or IP address.

"Data Controller" means the entity that determines the purposes and means of the processing of Personal Data. In the context of the processing referred to in this Policy, Gestrust acts as the Data Controller.

"Processing" means any operation or set of operations which is performed on Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation, modification, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or interconnection, as well as locking, erasing or destruction.

We may make changes to this policy at our sole discretion at any time. We will alert you if there are any significant changes to the latter.

Personal Data We Collect

The Personal Data we collect about you may include the following:

If you are a client or prospect: we collect the data necessary to evaluate, manage and monitor our fiduciary, wealth structuring or advisory services. This data may include:

- Identification information: first name, last name, date and place of birth, nationality(ies), contact details (address, telephone, e-mail).
- Professional information: name of the organisation, function, legal status of the client (natural or legal person), link to existing structures (companies, trusts, foundations).
- Financial and tax information: financial situation, income, banking information, tax returns, tax identification number, tax residence.
- Official documents: copies of identity documents, proof of address, tax certificates, legal acts.
- Information from regulatory checks: KYC/AML check results, sanctions lists, risk profiles, beneficial owners, politically exposed persons (PEPs).
- Other data necessary for the performance of contractual assignments or imposed by applicable laws.

If you are a visitor to our website : we collect the data you submit via our contact forms (name, surname, email address, message), as well as certain data automatically collected through cookies and web beacons, such as IP address, browser type, operating system, pages visited, date and time of connection and other technical data used for security purposes or anonymized statistics.

If you are a Gestrust employee : we process identification data (surname, first name, date of birth, contact details), professional data (position, qualifications, career history), administrative and contractual data (employment contract, residence permit, social insurance), financial data (salary, bank details), as well as, where applicable, certain sensitive data (e.g. medical certificates) and data from connection to internal IT tools.

If you are a candidate for a position at Gestrust: we collect the data necessary to study your application, in particular your surname, first name, contact details, CV, cover letter, information on your experience, diplomas, professional references, as well as any other data provided as part of our recruitment process.

How do we use your Personal Data?

We collect and process your Personal Data listed above for the following purposes, and on the legal bases, identified:

1. Where we have entered into a contract (or take pre-contractual steps)

- Manage the contractual relationship, including the opening, administration and termination of our fiduciary and advisory services.
- Implement agreed services, such as the formation or administration of companies, trusts or other legal entities.
- To ensure invoicing, accounting management and administrative follow-up of our services.
- To respond to your requests for contact or information prior to the conclusion of a contract.
- Manage life cycle of data performing to employment contracts for employees and the processing of applications in the context of recruitment.

2. Where we have an overriding interest in processing your Personal Data

- To ensure the security of our IT infrastructure, prevent unauthorized access, fight against fraud or malicious acts.
- To meet our compliance and risk management obligations (e.g. internal documentation, quality control, archiving of certain data).
- To manage relations with our partners and service providers (e.g. contractual follow-up, evaluation of services).
- Maintain professional communication with our existing contacts and customers (e.g. invitations to events, news, corporate communication, etc...)

3. When we need to comply with a legal obligation

- We process and disclose Personal Data to the extent that we are under an obligation to cooperate and comply with relevant regulatory and government authorities.
- We also process your Personal Data to comply with certain legal requirements relating to our field of activity.

4. When you consent to the processing of your Personal Data

- When your consent is explicitly required for the processing of your Personal Data, in particular when you accept the deposit of cookies that are not strictly necessary for the operation of our website. In this case, you have the right to withdraw your consent at any time. You can send an email to info@gestrust.ch.

How long do we keep your Personal Data?

Your Personal Data is retained for as long as necessary for the purposes described above, or to meet our applicable legal and regulatory obligations.

Who do we share your Personal Data with?

As part of the management of our services and in particular our website, we may call on third parties and subcontractors to support us in this mission. When we provide Personal Data to these third parties, they are not permitted to use it for any reason outside the scope for which we engaged them. To do this, we ensure that these third parties apply certain requirements relating to the processing and security of your Personal Data, including by signing confidentiality agreements and Data Processing Agreements (DPAs). If we become aware that any of our Processors are in breach of this Privacy Policy and/or the relevant agreements, we will take appropriate steps to prevent or stop the unauthorised use or disclosure of your Personal Data.

We also reserve the right to disclose your Personal Data in the following situations:

- (1) where permitted or required by law.
- (2) when we are trying to protect against or prevent actual or potential fraud.
- (3) when we investigate suspected or past fraud.

However, we do not and will never sell your Personal Data.

International Transfers of Personal Data

Your Personal Data will be collected, transferred and stored by Gestrust to the extent possible in Switzerland. In the event that your Personal Data is processed outside of Switzerland, the European Union or a country not recognized as having an adequate level of protection of Personal Data by the Federal Data Protection Commissioner (FDPIC), we will ensure that a mechanism is in place that is approved by the appropriate regulatory bodies, for example according to Article 16 of the Federal Data Protection Act.

Use of cookies and other trackers

Gestrust uses cookies and other tracking technologies when users browse our internal site. Cookies are small text files that are placed on your browser by a website. Each of these cookies may contain an identification number, an IP address, and the time and date of the last access. These cookies can allow us to operate our site, recognize you and remember your preferences each time you visit our site.

We use different types of cookies for various purposes:

1. **Strictly necessary cookies:** These cookies are necessary for the website to function. They allow you to use core features, such as secure access to your account. Without these cookies, the site cannot function properly.

2. **Performance Cookies:** These cookies collect information about how visitors use our site, such as which pages are visited most and any error messages. They allow us to improve the way the site works.
3. **Functionality Cookies:** These cookies are used to remember your choices (such as your language or the region you are in) and provide personalized features.
4. **Advertising and Targeting Cookies:** These cookies are used to show you more relevant advertisements based on your interests. They also help us limit the number of times you see an advertisement and measure the effectiveness of advertising campaigns.

You have the ability to manage your cookie preferences and disable certain types of cookies in your browser settings or through [our Cookie Preference Center](#). Please note that disabling certain cookies may affect the optimal functioning of our site.

Cookies can be either temporary (session cookies) or persistent. Session cookies are deleted when you close your browser, while persistent cookies remain on your device until they expire. The retention period varies depending on the type of cookie and your browser settings. Their maximum lifespan is 13 months.

Security of Personal Data

Your Personal Data is kept by Gestrust in complete security. Only our authorized employees and contractors (who have agreed to treat Personal Data securely and confidentially by signing a data protection agreement) have access to this information.

We implement a variety of industry-standard security measures to prevent unauthorized access, use, or disclosure of your Personal Data. While no method of electronic transmission or storage is 100% secure, we strive to implement best practices to protect your Personal Data.

Your rights

In accordance with applicable data protection laws and regulations subject to local data protection laws, you have the following rights:

- Right of access: you have the right to view the personal information collected by Gestrust about you and to obtain a copy of it.
- Right to rectification: you have the right to request the correction of inaccurate or incomplete data we hold about you.
- Right to erasure: you have the right to request the deletion of your Personal Data under certain conditions.
- Right to object: you may object to the processing of some of your Personal Data.
- Right to portability: you have the option to obtain a copy of some of your Personal Data in a structured format.
- Right to withdraw consent: you have the right to withdraw your consent to the processing of some of your Personal Data to the extent that the collection of the relevant data is based on your consent.
- Right not to be subject to automated individual decision-making (decision-making without human intervention). It should be noted that automated decision-making does not currently take place in our services.

For more information on your rights over your Personal Data, we invite you to consult the website of the Federal Data Protection and Information Commissioner: <https://www.edoeb.admin.ch/edoeb/fr/home.html>.

Exercising your rights and contacting us

To exercise your rights regarding your Personal Data, or if you have any questions about this Privacy Policy or our Personal Data protection practices, please send an email to info@gestrust.ch or a postal mail to:

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