

Privacy Policy for Video Surveillance

Data protection is important for us - please take note of the following Privacy Policy.

Below you can find an overview of the collection and processing of your personal data by Luzerner Kantonalbank AG (LUKB) in relation to the video monitoring of its branches and ATMs as well as any rights available to you under the applicable data protection law. Please refer to the Privacy Policy for Customers and interested Customers, which can also be found on the website in the section "Rechtliches" ("Legal") and, insofar as appropriate, also applies to the personal data collected by means of video surveillance.

This Privacy Policy is based on Swiss data protection law and the relevant provisions of the European Union General Data Protection Regulation (EU GDPR). The issue as to whether and to what extent this law is applicable is dependent upon the circumstances of the specific individual case.

Personal data means any information concerning an identified or identifiable person. Processing means any handling of data, irrespective of the instruments and procedures used. The issue as to which specific data we process in each individual case and how we use them is dependent on how you engage with monitored zones.

We invite you to familiarise yourself with the information set out below concerning data protection.

1. Who is responsible for the processing of personal data and whom can you contact?

Luzerner Kantonalbank AG, Pilatusstrasse 12, 6003 Lucerne, is responsible for the processing of personal data by LUKB. Please submit any questions or requests for information concerning data protection either by letter or email to the LUKB Data Protection Officer:

Luzerner Kantonalbank AG
Legal & Compliance
Data Protection Advisor
Pilatusstrasse 12
6003 Lucerne
datenschutz@lukb.ch

2. What categories of personal data do we process and where do we collect this data?

LUKB continuously uses cameras and video recordings to monitor its ATMs and branches, in particular for security reasons. Video recordings generally cover entrances and exits, the surrounding area, garages, stairways, client areas (e.g. counters or self-service zones) and other sensitive areas.

Video surveillance involves the recording of moving pictures, which can also be stored as images if necessary. As a general rule, cameras are permanently (24/7) in operation and do not make sound recordings. Recording functions are reduced to the necessary minimum. However, the possibility that specific persons (as well as particular categories of person, such as e.g. children) may be identifiable in certain recordings cannot be ruled out. The related technical information is recorded at the same time as the moving pictures (e.g. location, model, date and time).

In addition, there are sensors and certain cameras with a sensor function installed in the customer area at the head office, which are used exclusively to measure user frequency (customer frequency system). The customer frequency system is designed in such a way that no personal data is stored. The bank processes the non-personal metadata obtained from the customer frequency system in an anonymous form. The system can be used to evaluate the customer area usage and the demographics (biological gender and age groups) of customer area visitors.

3. On what basis and for what purposes is personal data processed?

Personal data is collected and processed on the basis of legitimate interests. Processing may occur in particular for the following purposes:

- protecting of property (e.g. against vandalism)
- protecting of security (including of clients and employees)
- protecting against abuses (e.g. breach of house rules)
- upholding and ensuring compliance with domiciliary rights
- preventing and investigating crime or administrative violations
- transaction and functional controls
- securing evidence

4. Who receives personal data?

LUKB processes and stores the personal data collected through video surveillance in Switzerland. They will only be shared with a third party if there is a legal (in particular a statutory) basis for doing so, in relation to the operation and maintenance of cameras, with your consent or with official authorisation (e.g. under the terms of a surrender order issued by criminal prosecution authorities situated either in Switzerland or abroad).

Within LUKB your personal data may be accessed by any persons who require them in order to comply with the obligations referred to above. These persons include, alongside our own employees, also the service providers and auxiliary agents appointed by us (including in particular "data processors"). Such persons are obliged under contract to comply with data protection rules and to uphold confidentiality.

5. How long will the personal data be stored?

LUKB processes and stores the personal data collected within the ambit of video surveillance for as long as it is necessary for the purposes described in section 3 or for the duration of any legal obligation. Thereafter, it is regularly erased, as far as technically possible.

6. What data protection rights do you have?

Under the terms of the applicable data protection law and insofar as provided for thereunder, each data subject has the right to **information**, the right to **correction**, the right to **deletion**, the right to **restriction of processing** and - insofar as applicable - the right to **data portability**.

LUKB reserves the right to invoke the restrictions provided for by law, for instance if it is obliged to store or process certain data, if it has an overriding interest (insofar as it is permitted to rely on it), if it is able to demonstrate compelling legitimate grounds for processing that override your interests, rights and freedoms, or if it requires the personal data for the establishment, exercise or defence of claims.

Please contact the body referred to in section 1 in order to exercise your rights. Each data subject also has, where applicable, the right to enforce their claims through court action or to involve the competent data protection authority. The competent data protection authority in Switzerland is the Federal Data Protection and Information Commissioner (www.edoeb.admin.ch).

7. Version and amendment of this Privacy Policy

The relevant up-to-date and valid version of this Privacy Policy is published on the LUKB homepage in the section "Rechtliches" ("Legal"). It can also be obtained using the QR code available at ATMs. LUKB reserves the right to amend this Privacy Policy at any time without prior notice.

Version: valid as at 1 April 2025