

Privacy Policy for Websites of Luzerner Kantonalbank AG

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) on its website www.lukb.ch (including LUKB sub-sites), and in relation to its newsletter and the Falcon.io tool as well as any rights available to you under the applicable data protection law. It supplements the Terms and conditions of access to websites and other digital channels of LUKB, which you can find on the website in the section "Rechtliches" ("Legal"). Please refer also 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 via the websites.

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 these laws are 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 is dependent upon how you interact with the websites and the services that are requested by you, agreed upon with you and/or used by you.

We invite you to familiarise yourself with the information set out below concerning data protection, or to request any third parties to do so, should you provide us with the personal data of any other persons.

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 collect and process?

On the one hand, you may provide personal data to us (e.g. first name, surname, date of birth and contact details) via an input mask (e.g. in a form, chat or calculation tool), by uploading files or in any other manner. On the other hand, whenever a website is visited, our web servers and other applications automatically record certain details (such as e.g. the IP address, the date and time of the visit, your computer's operating system or the browser used by you). The latter will be addressed in more detail in the following chapters.

3. Which tracking technologies are used?

LUKB uses the following tracking technologies on its websites. Measurements may be made anonymously or personalised. In this regard it is possible that the data collected may be transmitted either by us or by the third party operator of the technical systems concerned for processing by third parties, which may also take place abroad. The data collected may be used for statistical purposes, marketing purposes and also in order to improve the websites and the products and services offered by LUKB. These tracking technologies are switched off by default. You can enable and disable them.

a) Google Analytics

LUKB uses Google Analytics (including integrated tools such as Google Optimize, which for instance displays variants of web pages with the aim of improving a website's functionality and user-friendliness with reference to usage statistics, or displays age-appropriate content on the website based on the user's age registered with Google). Google Analytics is a service provided by Google Ireland Ltd. based in Dublin and Google Inc. based in the USA (hereinafter "Google"). Therefore, it cannot be ruled out that collected data may be transmitted to a Google server in the USA. LUKB has configured the service in such a manner that IP addresses are anonymised via IP masking and, in general, an allocation is not possible. In addition, LUKB has disabled the "Data transfer" and "Signals" settings. Although it may be presumed that the data collected for Google does not constitute personal data, it is possible that Google may use this data for its own purposes to draw conclusions about the identity of users, create personal profiles and link this data to any Google accounts held by these persons. The data collected is used in order to assess website usage, to generate reports concerning user activities on a website and to provide further services (e.g. the needs-based design of individual pages). Further information on Google's data protection policy for Google Analytics can be found on the respective homepage.

b) Google Ads Conversion Tracking

LUKB uses Google Ads Conversion Tracking. This is also a Google service. If a user is directed to our website via an advert that Google has placed on behalf of LUKB, this is recorded and a click statistic is generated, which is passed on to LUKB. The data collected is used in order to analyse the success of a given advert and to improve the content of adverts. It is not used to identify any website users. As this is a Google service, it cannot be ruled out that the data collected may be transmitted to a Google server in the USA. Further information from Google's data protection policy for Google Ads can be found on the respective Google homepage.

c) Google Ads Remarketing

LUKB uses Google Ads Remarketing. This is also a Google service. Usage of our websites is analysed in order to establish for instance the specific content that a user was interested in. Based on this information, LUKB advertising tailored to the user's interests may be displayed to the user on our website and also on the websites of third party providers or on the Google advertising network and the success of an advertising campaign can be measured. As this is a Google service, it cannot be ruled out that data collected may be transmitted to a Google server in the USA. Further information from Google's data protection policy for Google Ads can be found on the respective Google homepage.

d) Meta or Facebook Retargeting / Remarketing

LUKB uses "Meta Pixel" of Meta Platforms Ireland Ltd., based in Dublin or Meta Platforms Inc. based in the USA (hereinafter "Facebook"). Whenever a user visits our website, this information is transmitted by their browser to Facebook's servers. Where appropriate, Facebook may allocate this information to the user's account with a Facebook social network, display interest-based advertising of LUKB on Facebook social networks and measure the success of the campaign. Information from Facebook on data protection, including in connection with this mechanism, can be found on the Facebook homepage.

e) LinkedIn retargeting / remarketing

LUKB uses retargeting and remarketing tools of LinkedIn Ireland Unlimited Company based in Dublin (hereinafter "LinkedIn"). Whenever a user visits our website, this information is transmitted by their browser in pseudonymised form to LinkedIn's servers, which may also be situated in the USA. Where appropriate, LinkedIn may allocate this information to the user's LinkedIn account, display interest-based advertising of LUKB on the LinkedIn social network and measure the success of the campaign. Information from LinkedIn on data protection can be found on the LinkedIn homepage.

f) YouTube

LUKB incorporates videos from the platform "YouTube" into its website. This is a service provided by Google, which enables the attractive presentation of video content. These include in particular videos of LUKB, which it has uploaded to its own YouTube account on YouTube. Initially, only a preview of the external video content is displayed. LUKB has enabled the enhanced data protection mode. This means that, generally speaking, YouTube will not be able to collect any data until a user has clicked on the video. However, it cannot be ruled out that partner services of Google may nonetheless collect data (e.g. DoubleClick). Whenever a user watches a video, the user's IP address is sent to YouTube. In addition, YouTube may store various cookies on the user's end device or use comparable recognition technologies (e.g. device fingerprinting). This data is used in particular to collect statistics, to improve user-friendliness and to prevent fraud attempts. If a user is logged in to YouTube, YouTube will allocate the data recorded to the user's YouTube account (which can be avoided by logging out of YouTube beforehand). Information from YouTube on data protection can be found on the YouTube homepage.

4. Which cookies are stored and how can you disable cookies?

Whenever you access any LUKB website our web server will record certain details concerning your visit (e.g. the LUKB website visited by you, your IP address, the date and duration of your visit and the website you were referred from). LUKB also uses in particular the cookies mentioned in this Privacy Policy and/or on the cookie page. Cookies are small data files that are stored on your computer and are used to record user data.

The cookies necessary for website operation (e.g. to guarantee security or proper functionality) are enabled and cannot be disabled. Preference, statistical and marketing cookies are disabled and are only enabled if the user has clicked to consent to the usage of cookies (e.g. in the cookie banner). Further information on these individual cookie groups can be found on our cookie page. You can enable and disable preference, statistical and marketing cookies.

The cookie page and the cookie banner are available in four languages (German, English, French and Italian) and are displayed in the language that you have set in your browser. We use the Cookiebot service of Usercentrics A/S, Havnegade 39, 1058 Copenhagen, Denmark for cookie consent management. For this purpose, Cookiebot processes your IP address (whereby the last three digits are set to 0), the date and time of your consent, browser information, the URL from which any consent was transmitted, an anonymous, random key as well as the user's status in terms of consent or refusal. Your status can be identified using the key. Keys and status details are stored in the browser for twelve months. Further information concerning Cookiebot can be found on the Cookiebot homepage.

5. Which newsletter tool is used?

On the basis of your consent, your contact data (title, first name, surname and email address) as well as details concerning the newsletter that you have subscribed to are collected and processed in order to ensure the dispatch and administration of our newsletter.

LUKB uses XCampaign provided by KünzlerBachmann Directmarketing SIG AG (Theaterstrasse 17, CH-8400 Winterthur; hereinafter "XCampaign") in order to dispatch newsletters. The data is encrypted in Switzerland and stored on the servers of MAILPROFILER Development s.r.o., Reznicka 1332/7, 460 01 Liberec, Czech Republic. Alongside the

dispatch of newsletters, the tool is also used for statistical analysis of user behaviour and the optimisation of newsletters. A newsletter may contain a web beacon (tracking pixel) or similar technical features. A web beacon is a data file associated with the user ID of the respective newsletter subscriber. These technical features can be used in particular to identify the address to which a newsletter was sent, the addresses at which a newsletter has not been received, who has opened the newsletter, who has clicked on the respective link and who has unsubscribed from the newsletter. The web beacon is deleted when a user cancels the newsletter. A user can prevent web beacons from being used by configuring their email program so that no HTML content is processed in messages .

The newsletter may be subscribed to by providing written consent or via the double opt-in procedure. A user can unsubscribe from the newsletter at any time by clicking on a link provided at the end of each newsletter. Further information on data protection can be found on the KünzlerBachmann homepage.

6. Which social media management tool is used?

LUKB uses the social media management tool of Falcon.io ApS (H.C. Andersens boulevard 27, 1st floor, 1553 Copenhagen V, Denmark). This software enables LUKB to manage its social media profiles and activities in a standardised manner, to plan and execute its social media contributions and to analyse its publications. Further information on Falcon.io's data protection can be found on its homepage.

7. Which chatbot tool is used?

LUKB uses a chatbot called 'Lou' on lukb.ch. Lou is a latest-generation chatbot from swiss moonshot AG. It uses artificial intelligence (ChatGPT from OpenAI) and large language models (LLMs) to understand and answer users' questions automatically. Answers may not be complete, correct or up-to-date and are therefore not legally binding. Lou's knowledge relates exclusively to information about Luzerner Kantonalbank AG, its products and services, as well as information on lukb.ch.

When a user interacts with Lou, a random chat-number is assigned and stored in a cookie. This number cannot be used to establish a relation to the IP address. Based on the chat history, it is not possible to trace back to the user as a natural person, unless the user provides information in the chat that enables them to be identified. Technical filters are in effect to prevent, insofar as possible, sensitive personal data from being entered. These technical filters encompass data such as dates of birth, telephone numbers, IBANs, credit card numbers and more. However, it is not possible to ensure that this kind of input will be prevented in all cases.

LUKB processes data that users enter into the chat as free text. This information is exclusively processed and stored in Switzerland and is used for the continuous optimisation of Lou by LUKB and swiss moonshot AG. In particular, it is processed in the form of analyses and evaluations of the data entered into the chat by a user. Only authorised employees of LUKB, swiss moonshot AG (the developer of Lou) and Microsoft Schweiz GmbH (ChatGPT service provider) have access to the data. Data entered by users is automatically deleted after 6 months.

8. 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, the right to object to data processing (in particular to direct marketing or profiling for direct advertising purposes) 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).

9. 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"). LUKB reserves the right to amend this Privacy Policy at any time without prior notice.

Version: valid as at 19 April 2024