

Information for clients regarding the risks involved in payment traffic and in securities trading - data of bank clients

With regard to payment traffic and in securities trading, Banca Popolare di Sondrio (SUISSE) is obliged to observe statutory requirements and both Swiss and international regulations.

As regards national and international payments, and in accordance with the provisions established to combat money laundering and the financing of terrorism, the banks involved and managers of payment systems in Switzerland and abroad will be provided with **the last name and first name (or the company name) as well as the address and account number (IBAN) of the party placing the order**. In case of joint account our bank will disclose the aforementioned data of all account holders.

The banks and system managers mentioned above include primarily correspondent banks of the issuing bank and managers of payment systems (e.g. in Switzerland SIX Interbank Clearing SA) or SWIFT. Moreover, it is possible that the parties involved in the transaction will in turn transmit data to third parties tasked with processing or protecting data in other countries. Finally, the beneficiary in Switzerland or abroad also receives the data of the issuing party.

As regards execution of transactions involving national and international securities and with regard to the checks that these transactions entail, both for deposits and withdrawals of securities to or from a custody account and for custody account transfers, **the custody account number and the name and address of the end beneficiary** who is the holder of the custody account in Switzerland may be transmitted abroad if the banks and centralized securities custodial systems transmit such data via SWIFT as part of regular execution. Furthermore, if the order issued by the client includes securities held abroad, the SWIFT messages will include **the name of the securities holder or the name of the registered shareholder and, in some cases, the address**.

For other transactions, e.g. documentary credits, guarantees, collections and forex transactions, all the data relating to the transaction (e.g. name, address, account numbers of the parties involved) will be transmitted via SWIFT to the banks and system managers. These data will be transmitted abroad. As with payment and securities transactions, in this case too, checks may be carried out on transactions effected via SWIFT.

As of the time the data are transmitted abroad they are no longer protected by Swiss law but are governed by the respective international jurisdiction. Foreign laws or regulations may stipulate, for example, that these data be divulged to the authorities or to third parties.

For further information please consult the information published by the Swiss Bankers Association at www.swissbanking.org and www.finma.ch or contact your advisor.