

# **Sibos Privacy Statement**

# Introduction

This Privacy Statement explains how your personal data is processed by SWIFT. SC ("Swift", "we", "us" or "our"), when you register and participate in the Sibos 2024 event ("Event") and use our services and tools in this context. Capitalised terms used in this Privacy Statement but not defined herein have the meaning given to these terms in the Sibos Registration Policy.

"Personal data" means any information relating to an identified or identifiable individual.

We process your personal data in several ways when you attend the Event. We process data collected via your online registration and when you use our app ("Sibos App"). With your consent, we may perform such analyses to provide you with tailored recommendations for sessions at future Sibos events.

The Badge also allows participants to share their contact details with each other, request exhibitors to send them marketing information.

# 1. Sibos Tools – Digital experience

After the availability of the Sibos digital experience, user profile is automatically created following fully completed registration (including payment if applicable).

The login to the Sibos digital experience is based on a verification code sent to the email address used to register. You are entirely responsible for maintaining the confidentiality of your account, as well as for all activities that occur under your account.

In addition, you agree to notify Swift immediately of any (suspected) unauthorised use of your account or any other breach of security. Swift will not be liable for any loss that you may incur in the event of unauthorised access or use of your account.

Subject to the Registration Policy, you will receive restricted access to the Sibos Tools – Digital experience. These Sibos Tools – Digital experience will be made available to all Sibos participants who are duly registered and include:

- The Sibos 2024 participant directory
- The Sibos chat service
- Sibos.com including the restricted pages for participants
- The Sibos Mobile Application (Sibos App developed by Swift contact: <u>sdc-mobile-sysgroup@swift.com</u>)

The Sibos Tools are made available to you for networking, preparation and planning of the event, and follow-up purposes.

The Sibos Tools allow you in particular to contact and exchange information with other Sibos participants and Sibos Partners.

By using the Sibos Tools, you hereby agree to abide by <u>Terms of Use</u> of Sibos.com & Sibos Mobile Application. In particular, you agree (i) not to use these Sibos Tools or any other related products and services for any other purposes and (ii) to comply at all times with any applicable terms of use as notified to you by Swift.

# 2. What Personal Data We Collect

We collect personal data when you use the Sibos App, badge and all other services, tools and features available at the Event ("**Services**") and from other sources as explained below.

Where applicable, we indicate whether and why you must provide us with your personal data, as well as the consequences of failing to do so. If you do not provide personal data when requested, you may not be able to benefit from all our Services.

This section describes the types of personal data we process and the sources from which we obtain them.

## 2.1. Sibos Registration Information Provided by You

When you register to the Event, you are directed to perform online registration on our website. When you fill in a form and register for the Event, we may collect your last name, first name, job title, company name, contact details (company email address and mobile number, postal address including country, emergency contact), passport information, BIC/PIC, VAT number, photograph, accreditation, type of institution, age range, primary business / market focus, primary area of responsibility, function within the institution and optional personal interests.

All mandatory data needed for your registration are indicated with an asterisk. Failing to provide this information will prevent us from registering you for the Event (in accordance with the <u>Sibos Registration Policy</u>).

Some sections in the registration form will be prefilled if you've participated in a Sibos event before. You may confirm or amend this information e.g., your country, institution type, category of function, primary business focus, primary area of responsibility and age range.

## 2.2. Personal Data Collected via the Sibos App and Sibos.com

We collect your personal data when you log on the Sibos App or Sibos.com and use the functionalities like your favorites (speakers, sessions, delegates), your ratings (sessions).

#### 2.3. Speakers

Every year, Swift receives names and email addresses of potential speakers directly from either the members of its community or its staff (e.g., relationship managers). The speakers are typically – but not only – industry leaders or influencers who might be invited to speak during the Sibos conference.

If you are a (potential) speaker at the Event we may collect additional information such as details about your work history and education.

Selected speakers will be asked to register to Sibos and therefore comply with the <u>Sibos Registration Policy</u>.

#### 2.4. Communication

If you choose to contact us for any purpose via email, mail, in-app chat or any other means, we will collect your contact details, your name, and the content, date and time of your message, as well as our reply and any follow up action we take in relation to your inquiry. We also collect information regarding any ratings or comments you make in the Sibos App or online regarding any sessions you have attended during the Event.

#### 2.5. Photographs and Videos

The Company may photograph or videotape its own promotional events and materials at its own stand space at its own discretion but subject to all applicable laws, in particular but not limited to any and all personal data protection regulations. All other photography and videotaping is strictly prohibited. The Company shall ensure that their staff members, agents, sub- contractors as well as any Participants are informed about and do not object to their image being used for these purposes.

Any photography or videotaping outside of your stand space must be performed by the Sibos Exhibitors Media Services or approved by Sibos Exhibitions Office if you wish to bring in your own suppliers. The Organiser, the official show photographer and accredited Press are exempted from this rule. Accredited members of the press are authorized to selectively capture and share portions of the conference sessions in accordance with fair use principles.

However, it is strictly prohibited for all participants to record and publicly distribute the entire sessions as this would compromise the integrity of the event's content and speakers. In accordance with the Sibos Registration Policy, Swift reserves the right to photograph and videotape all Sibos events and participants and to use such photographs and videos in any internal and external communication referring to Sibos or to Swift services and products, such as on its websites and intranet, in the Sibos Issues, Sibos Programme, Sibos tools – Digital experience, Wrap-up reports and in its annual reports as well as on social media channels such as LinkedIn, X (Twitter), SmugMug, SoundCloud, Instagram or YouTube. Swift may use AI capabilities to facilitate the content editing process, which remains subject to manual review.

## 2.6. Sibos Chat Service

When you use the "Sibos Chat Service" feature embedded in the Sibos App or Sibos.com, we will process your messages as necessary to enable this feature.

## 2.7. Cookies and Similar Technologies

For a description of the use of cookies and similar technologies in the Sibos App or Sibos.com, please consult the <u>Sibos Cookie Policy</u>.

# 3. Use of Your Personal Data

## 3.1. Event Organisation and Administration

We process your personal data to register you for the Event and manage your participation in the Event, including Event administration, accounting, records keeping, offering Sibos related products and services, responding to your queries and providing customer support.

Swift may process personal data of (potential) speakers for the purposes of identifying, selecting and/or confirming speakers, managing the invitations and related logistics (e.g., visa) and keeping information and statistics about the speakers' history at Sibos (e.g., to ensure a broad variety of speakers throughout the years).

## 3.2. Providing Sibos App, Chat Service and All Related Features

We process your personal data to provide all the Sibos App features as well as any other tools or features available in connection with the Event. For instance, we may process your activities registered by the Sibos App to give you points to be converted into a charity donation.

Swift may process your personal data as necessary to enable the Sibos Chat Service. For more information on this feature, please read the Sibos application's <u>Terms of Use</u>.

## 3.3. Direct Marketing

#### Sibos Insider

During the online registration process, you can subscribe to the official Sibos newsletter ("Sibos Insider"). You may additionally subscribe to the Sibos Insider at any time through Sibos.com.

#### Swift Marketing

You can also subscribe to other commercial mailings and newsletters related to Swift's business, products, and services by selecting "Yes" in the privacy settings. If you choose "No", you may still share your contact details for marketing purposes with Swift by sharing your contact details (QR displayed on your badge) at a Swift stand at Sibos.

#### Third Parties Marketing

Finally, you can as well – in the "privacy settings" step – choose "Yes" to share your contact details with the Sibos Exhibiting Companies and the Sibos Global Media Partners for the purpose of allowing them to contact you directly to present their products and services.

By choosing "No" you do not authorize such data sharing. However, even if you choose "no", you may still share your contact details with Exhibiting Companies by allowing them to scan your badge at Sibos. The Exhibiting Companies will then automatically receive your contact details to send you marketing communications. Swift is not responsible for such data disclosure to Exhibiting Companies and Exhibiting Companies' subsequent processing of your personal data.

#### 3.4. Personalizing our Services

We will use the personal data you provide upon registration and in your account to tailor our Services (e.g., based on your profession, demographics, or service area). This includes recommending you via the Sibos App other sessions that you might be interested in.

With your consent, we may also analyse your activities at the Event, at the Event Venue, attended sessions, sessions/speakers/participants flagged as favourites, session ratings and comments, booths visited, contact exchanges, and consumed content on the Sibos App and website, to provide you with tailored recommendations for future Sibos events.

#### 3.5. Product and Service Development

Swift may analyse participants' demographic information provided upon registration or in their account, and their activities at the Event Venue, for the purpose of evaluating attendance to sessions, performance of the exhibition floor and the Event in general. We will use such data to evaluate the Event, improve and develop Swift products and services and organize future Sibos editions.

#### 3.6. Ratings and surveys

Any Sibos participant using Sibos Tools – Digital experience will, on a voluntary basis, be invited to rate the sessions to participate to any surveys related to Sibos. The rating and survey results will be aggregated and processed by Swift for statistical purposes and published through the Sibos Tools – Digital experience in aggregated form.

#### 3.7. Statistics

Based on your registration data and demographics, statistics will be published on the Event website <u>www.sibos.com</u>. These statistics will only include aggregated data pertaining to the pre-filled sections in the registration form to be selected by the participant.

In addition, Swift may create statistical reports based on participants' demographic data and their activities at the Event including their movements at the Event Venue and share such anonymous reports with exhibitors and other participants (e.g., to show the demographics of participants attending a session), and Swift employees.

#### 3.8. Security

#### Access control

Swift will scan the QR code on the badge to check if the Participant is entitled to attend Sibos.

#### Security Monitoring

Swift may also process personal data for the purpose of event security management (e.g., to prevent security incidents at the Event).

#### IT Monitoring

Swift will monitor the IT infrastructure of Sibos (e.g., Wi-Fi) to verify the adherence to the Sibos <u>Wi-Fi Acceptable Use Policy</u>.

## 3.9. Legal

We may use your personal data to enforce this Privacy Statement, <u>Sibos</u> <u>Registration Policy</u>, or our <u>Terms of Use</u>, or as necessary to establish, exercise and defend legal rights, and to comply with applicable legal requirements, industry standards and our policies.

# 4. Legal Basis for Using Your Personal Data

We only process your personal data based on a valid legal ground:

## 4.1. Contract

We need your personal data to provide you with our Services, for example for account registration and management or to respond to your inquiries.

#### 4.2. Legitimate Interest

We have a legitimate interest to use your personal data. In particular, we have a legitimate interest to use your personal data for product development and analytics purposes, to conduct surveys, to personalize our offering, and otherwise to improve the safety, security, and performance of the Services.

We only rely on our legitimate interests to process your personal data when our interests are not overridden by your interests or fundamental rights and freedoms requiring protection of your personal data.

#### 4.3. Consent

We may process your personal data based on your consent as explained in this Privacy Statement, for example to send you marketing communications, to use cookies and similar technologies, or to analyse your activities at the Event to provide you with tailored recommendations for sessions at future Sibos events.

#### 4.4. Legal Obligation

We have a legal obligation to use your personal data for certain purposes, for example to comply with tax and accounting obligations.

# 5. Disclosure of Your Personal Data

We may share your personal data as described in this Section 4, or as otherwise notified to you.

#### 5.1. Exhibitors

When you register to the Event you can choose to give your consent to your contact details being shared by Swift with all Exhibitors and Sibos Media Partners through the Sibos Participant list for marketing purposes. The Sibos 2024 participants list includes title, first name, last name, company, job title, company email, postal address, business focus, responsibility, function, institution type.

In accordance with the <u>Sibos Registration Policy</u>, Exhibiting Companies can obtain a Lead Retrieval Service by renting a device for the purpose of scanning Sibos participants' badges only on their stand location or at a location where the Exhibiting Company is organizing an event, cocktail or dinner. The Exhibiting Companies are not authorized to use the device in any other area, such as in conference rooms. Scanning of your badge by an Exhibiting Company should only be done with your express consent. By allowing the Exhibiting Company to scan your badge, you will disclose to the Exhibiting Company your first name, last name, institution, country, and email address. Exhibiting Companies may only use such information for the purpose of evaluating attendance and to present their products and services.

## 5.2. Sibos 2024 Participant Directory

Swift will also process your personal data to create the Sibos 2024 Participants Directory. This directory is available on Sibos.com and in the Sibos App when a participant is logged in and allows every person who registered to the Event to get to know all the other participants. It includes participant picture uploaded by the registrant during the registration, participant first name, last name, job title.

As part of the Participant Search/Filter networking functionality, the following categories will be used as search criteria/filters: Business interests, type of institution, are or responsibility, function within the institution, company name, type of participant (speaker, delegate, stand representative)

#### 5.3. Service Providers

We use third-party service providers to operate and provide our Services. In particular, we work with third parties to provide development, hosting, maintenance, and other services for us. We also use a third-party provider to power the Sibos Instant Messenger (e.g., storing the messages on our behalf).

These third-party service providers may have access to or process your personal data as part of providing those services for us. We require such providers to only process your personal data on behalf of and under the instructions of Swift, and only as necessary to provide their services to us.

Your personal data may be disclosed and otherwise transferred to an acquirer, successor, or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets.

## 5.4. Legal

We reserve the right to disclose your personal data that we believe, in good faith, is appropriate or necessary to (i) take precautions against liability, (ii) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity, (iii) investigate and defend ourselves against any third-party claims or allegations, (iv) protect the security or integrity of the Services and any facilities or equipment used to make the Services such as Sibos App and Badge features available, or (v) protect our property or other legal rights (including, but not limited to, enforcement of our agreements), or the rights, property, or safety of others.

We may be required by law or requested by (foreign) government agencies, such as law enforcement authorities or customs authorities, for example in the framework of a judicial procedure, to disclose your personal data.

#### 5.5 Swift's group companies

We may share personal data with our affiliates, subsidiaries and branch offices to which it is reasonably necessary or desirable for us to disclose personal data in order to carry out the above-mentioned data processing purposes.

# 6. Your Rights and Choices

You may request access to and receive information about the personal data we maintain about you, update and correct inaccuracies in your personal data, restrict or object to the processing of your personal data, have the information anonymized or deleted, as appropriate, or exercise your right to data portability to easily transfer your personal data to another company. In addition, you may also have the right to lodge a complaint with a supervisory authority, including in your country of residence, place of work or where an incident took place.

You may withdraw any consent you previously provided to us regarding the processing of your personal data, at any time and free of charge. We will apply your preferences going forward and this will not affect the lawfulness of the processing before you withdrew your consent.

You may exercise these rights by sending your request together with a proof of your identity to Swift's Privacy Officer (<u>privacy.officer@Swift.com</u>).

Until the end of September 2024, you can update your own privacy settings and change your personal data at any time through Sibos.com.

You may at any time disable your badge by making such request at the registration desk at the Event Venue, or via email to <u>registration@sibos.com</u>. Swift will then deactivate the link between the Badge and its system. You can then only use your badge as your name tag for security checks. This is a permanent choice (i.e., it will not be possible to reactive the link with the Badge).

# 7. International Data Transfers

When necessary to deliver the Sibos experience, we may transfer your personal data internally at Swift or externally to a country located in or outside the European Economic Area (EEA) or the United Kingdom. When transferring personal data outside of the EEA, we use different data transfer instruments. We may transfer your personal data to countries for which adequacy decisions have been issued (e.g., Switzerland), or use contractual protections for the transfer of personal data, such as Standard Contractual Clauses where applicable. For instance, the entities belonging to the Swift group (including in China) have signed an Intra-Group Data Transfer Agreement based on the EU standards.

You may contact us as specified below to obtain a copy of the safeguards we use to transfer personal data outside of the EEA or UK.

For the Sibos 2024 Beijing edition:

- your personal data (first name, last name, country and company) may be processed by a third-party provider based in China, for on-site logistical support, including badge printing and distribution;
- the personal data of all registered participants (first name, last name, country, company, passport or China ID information and profile picture) will be shared upfront with the legal and telecommunication authorities in China, so they can generate (and you may receive) the credentials needed for you to access and benefit from free Wifi Access at the Sibos venue.

# 8. Links to Third Party Services

The Sibos App and Sibos website may contain features or links to websites and services provided by third parties. Any information you provide on third-party sites or services is provided directly to the operators of such services and is subject to those operators' policies, if any, governing privacy and security, even if accessed through our Services.

We are not responsible for the content or privacy and security practices and policies of third-party sites or services to which links or access are provided through the Services. We encourage you to learn about third parties' privacy and security policies before providing them with your personal data.

# 9. Data Security

Before and during the Sibos event, we use certain physical, organisational, and technical safeguards that are designed to ensure the integrity and security of the personal data that we process.

In addition to the Sibos Tools, Swift will offer all Sibos attendees free access to Wi-Fi at the China National Convention Centre (CNCC). Swift will provide each attendee with a unique and personal set of credentials to connect to the Sibos Wi-Fi network. Credentials are unique and linked to an attendee, therefore, they should not be shared with any other party, pre, during or post Sibos 2024. To generate these credentials, Swift will collect specific personal identify information during the registration process to help enable access. Once this information is acquired, Swift will transfer this data to the legal and telecommunication authorities in China, whom are sole responsible for credentials management and monitoring, as they may deem appropriate.

Based on current planning, five (5) is the maximum number of devices that can be authorised using a single set of credentials, with all of these devices able to concurrently connect.

You are required to use the Sibos Wi-Fi legally, professionally and in accordance with the <u>Wi-Fi Acceptable Use Policy</u>, in a way that would not violate the right of any third-party or create any interference on the network.

In accordance with our <u>Wi-Fi Acceptable Use Policy</u>, the Wi-Fi provided at the Event is monitored by Swift for security and quality control purposes. In this regard, only your IP address and traffic data are initially processed. Only if further investigation is needed, your personal details may be used in order to contact you to gather further information or to discuss our concerns or be able to respond to a threat. Illegal use or serious security breaches may be reported to the authorities or any competent law enforcement agency.

# 10. Data Retention

We take measures to delete your personal data or keep it in a form that does not permit identifying you when this information is no longer necessary for the purposes for which we process it, unless we are required by law to keep this information for a longer period. We generally do not retain personal data for longer than 9 years after the end of the Event. However, messages sent via the Sibos Chat Service are only kept for 3 months after the Event. Personal data of potential or confirmed speakers is kept for 5 years after they were added to our database or after the speaker's last performance at Sibos (whichever is the latest).

When determining the specific retention period, we take into account various criteria, such as the type of service provided to you, the nature and length of our relationship with you, and mandatory retention periods provided by law and the statute of limitations.

# 11. Changes to this Privacy Statement

Please revisit this page periodically to stay aware of any changes to this Privacy Statement. This Privacy Statement will be updated each year. If we modify this Privacy Statement, we will make it available through our website and Sibos App and indicate the date of the latest revision.

# 12. Contact Us

The entity responsible for the processing of your personal data as described in this Privacy Statement is Swift SC, located at Avenue Adèle 1, B-1310 La Hulpe, Belgium.

For any questions related to your privacy or this Privacy Statement, you can contact Swift's Data Protection Officer by mail at

Data Protection Officer, Avenue Adèle 1, B-1310 La Hulpe, Belgium, or by e-mail at privacy.officer@Swift.com.