

EFG Wealth Management (Israel) Ltd Privacy Notification to Clients and Prospective Clients Regarding Recorded Telephone Communications (Israel)

1. Introduction

EFG Wealth Management (Israel) Ltd, 3 Rothschild Blv. Tel Aviv Israel (“we”) is committed to protecting your privacy and personal data by complying with the Israeli Protection of Privacy Law, 1981 and Privacy Protection Regulations (Data Security), 2017 (together, “**Israeli Privacy Law**”). This Privacy Notification (the “**Notice**”) applies to our clients and prospective clients (“you”) whose telephone conversations with our representatives are being recorded. It applies to both incoming and outgoing voice calls made via telephone. This Notice is to be read in conjunction with our main privacy notice, EFG Wealth Management (Israel) Ltd – *Notification to clients and prospective clients*, which is available on our website at: <https://www.efginternational.com> (the “*Main Privacy Notice*”). Together, they provide a comprehensive overview of how we collect, use and process your personal data.

2. Types of personal data collected

In the course of our telephone communication with you, we may process the following personal data relating to you, among others:

(A) Identification and contact details, including:

- full name and title; and
- telephone number.

(b) Call recording and audio data, including:

- voice; and
- the content of the conversation, including any information you provide during the call, such as financial, transactional, service-related, or account-related information.

In some instances, and only to the extent such information is provided by you during the call, we may also process information that may be considered “sensitive information” under Israeli Privacy Law.

3. Sources of personal data

We collect your personal data directly from you during our telephone conversation.

4. How we use personal data

(a) The purposes for which we may process your personal data in connection with recorded telephone communications include:

- to verify your identify;
- to manage your account or respond to your requests;
- to comply with applicable legal and regulatory requirements and to maintain records (including under financial regulation, anti-money laundering requirements, and record-keeping rules); to maintain accurate client records and document communications and instructions;
- to provide banking or investment services and support;
- to carry out call quality monitoring and perform security checks;
- to detect and address security incidents, suspicious activities or potential fraud;
- to ensure compliance with our policies and risk management rules;
- to resolve dispute or handle complaints; and/ or
- to establish, exercise or defend legal claims.

(c) If you fail to provide personal data

Your agreement to the recording of the call and to the collection of information during the call is voluntary and subject to your consent. However, if you object to call recording or choose not to provide certain information during the call, we may not be able to proceed with the conversation or provide certain services. Please note that we may still process personal data that has already been collected where required or permitted by applicable law.

5. Retention of personal data

We will retain personal data for as long as necessary to fulfill the purpose for which it was collected or to comply with legal, regulatory, accounting, reporting or internal policy requirements. To determine the appropriate retention period for personal data, we consider the applicable legal requirements, as well as the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means. As a general rule, telephone communications, including call recordings, will be retained for up to five years from the date of the communication, unless a longer retention period is required to comply with applicable legal, regulatory, or contractual obligations, including pending or anticipated litigation or regulatory investigations.

Further information on the applicable retention periods can be obtained by contacting our Data Protection Officer (for contact details, see below under Section 6).

6. Data recipients, international data transfers and your privacy rights

For further details regarding the recipients of your personal data, international data transfers, and your rights in connection with your personal data, please refer to Sections 5, 6, and 8 of the Main Privacy Notice. These sections provide comprehensive information on how your personal data may be shared, the safeguards applied in case of overseas transfers, and the rights you may exercise under applicable data protection laws.

Under Israeli Privacy law you have a right to request access to or obtain a copy of your personal data processed by US.

Please note that the exercise of your right will be limited to the extent required by law, and as required to avoid harming the rights or freedoms of others.

You have the right to withdraw consent. Where we have relied on your consent to process particular information and you have provided us with your consent to process that information, you have the right to withdraw such consent at any time.

If you want to exercise your rights, as per above, or if you have any queries relating to the processing of your personal data, you may contact our Data Protection Officer, by sending a letter to the mailing address: 3 Rothschild Blv. 6688106 Tel Aviv Israel, to the attention of the Data Protection Officer, or at privacy.efgwmi@efginternational.com .

7. Changes to this Notice

We reserve the right to update this Notice at any time, and we will notify you either in writing or by updating this Notice on our website at: <https://www.efginternational.com>. Any changes to this Notice are applicable by the time of its update on our website, unless otherwise provided.