

# Privacy Policy

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## ZEUS Institution for Asset Management

Compliance with data protection laws, namely the EU General Data Protection Regulation (hereinafter "GDPR") and thus the protection and confidentiality of your personal data is an important concern for our company. This Privacy Policy informs you about how our company collects and handles personal data in our role as data controller and it sets out in particular what rights you have in relation to the personal data.

### 1. General

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the General Data Protection Regulation and in accordance with the country-specific data protection provisions applicable to our enterprise. By means of this data protection declaration, our company would like to inform the public about the type, scope and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed of their rights by means of this data protection declaration.

### 2. Definitions

The data protection declaration of ZEUS Anstalt für Vermögensverwaltung is based on the notions used by the European Directive and the Regulation when adopting the Data Protection Regulation. Our data protection declaration should be easy to read and understand for the public as well as for our clients and business partners. To ensure this, we would like to explain the terms used in advance.

We use the following terms, among others, in this data protection declaration:

#### 2.1 Personal data

Personal data is any information relating to an identified or identifiable natural person (hereinafter "data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

#### 2.2 Data subject

Data subject means any identified or identifiable natural person whose personal data are processed by the controller.

#### 2.3 Processing

Processing means any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organisation, filing, storage,



adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

#### 2.4 Restriction of processing

Restriction of processing is the marking of stored personal data with the aim of limiting their future processing.

#### 2.5 Profiling

Profiling is any type of automated processing of personal data which consists of using such personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects relating to that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or change of location.

#### 2.6 Recipient

Recipient means a natural or legal person, public authority, agency or other body to whom personal data are disclosed, whether or not a third party. However, public authorities that may receive personal data in the context of a specific investigative task under Union or Member State law shall not be considered as recipients.

#### 2.7 Third party

Third party means any natural or legal person, public authority, agency or other body other than the data subject, the controller, the processor and the persons authorised to process the personal data under the direct responsibility of the controller or the processor.

#### 2.8 Consent

Consent means any freely given specific and informed indication of the data subject's wishes in the form of a statement or other unambiguous affirmative act by which the data subject signifies his or her agreement to the processing of personal data relating to him or her.

### **3. Name and address of the controller or whom you can contact**

Controller or data controller is the natural or legal person, public authority, agency or other body which alone or jointly with others determines the purposes and means of the processing of personal data.

The controller within the meaning of the General Data Protection Regulation is the:

ZEUS Anstalt für Vermögensverwaltung

Industriestrasse 2

FL-9487 Bendern

T +423 2220011

F +423 2220018

E-mail: [info@zeus-management.li](mailto:info@zeus-management.li)



## 4. Framework of data processing

### 4.1 Categories of data processed and origin

We collect and process personal data that we receive in the course of our business relationship with our customers. In principle, as little personal data as possible is processed. Depending on the groups of persons, the data processed may differ. Personal data can be collected or (further) processed in every phase of the business relationship, from the initiation to the termination of the business relationship.

In addition to customer data, we may also process personal data of other third parties involved in the business relationship.

By personal data we mean the following categories of data:

- Personal data
- Legitimation data and authentication data
- Information from the fulfilment of our legal obligations
- Other master data
- Data from the fulfilment of contractual obligations
- Information on financial situation and professional background
- Documentation data
- Marketing data
- Technical data
- Information from your electronic communications with our company
- Data from publicly available sources

We process personal data from the following sources:

- Personal data we receive from you by means of submitted contracts, forms, your correspondence or other documents
- Personal data that is collected or transmitted as a result of the use of our products or services.
- Personal data which are transmitted to us by third parties, by public authorities (e.g. sanction lists of the UN and the EU) or by other companies in a permissible manner (e.g. for the execution of orders or for the fulfilment of contracts).
- Personal data - to the extent necessary for the provision of our services - which we have permissibly obtained from publicly accessible sources or other sources, such as databases for the verification and monitoring of business relationships (e.g. judicial, official or administrative measures, memberships and offices).

### 4.2 Legal basis and purposes for processing personal data

We process personal data in accordance with the provisions of the GDPR on the following legal basis and for the following purposes:

#### 4.2.1 For the performance of a contract or for the implementation of pre-contractual measures

If the processing of personal data is necessary for the performance of a contract (such as the provision of financial services) to which the data subject is a party, the processing is based on Article 6(1)(b) DSGVO. The same applies to such processing operations that are necessary for the implementation of pre-contractual measures, for example in cases of enquiries about our services.

#### 4.2.2 For the fulfilment of legal obligations



If our company is subject to a legal obligation by which the processing of personal data becomes necessary, such as for the fulfilment of tax, supervisory or money laundering obligations, the processing is based on Art. 6 (1) lit. c DSGVO.

#### 4.2.3 For the protection of legitimate interests

Likewise, processing operations may be based on Art. 6(1)(f) DSGVO. Processing operations which are not covered by any of the aforementioned legal bases are based on this legal basis if the processing is necessary to safeguard a legitimate interest of our company or a third party, provided that the interests, fundamental rights and freedoms of you are not overridden. Such legitimate interests include in particular the following processing activities:

- Prevention of fraud
- Direct marketing
- Transfer of data within a group of companies for internal administrative purposes
- Ensuring network and information security
- Prevention of possible criminal offences

In addition, we collect personal data from publicly accessible sources for the purposes of customer acquisition and money laundering prevention.

#### 4.2.4 Based on your consent

Art. 6 para. 1 lit. a DSGVO serves our company as the legal basis for processing operations in which we obtain consent for a specific processing purpose.

### 4.3 Use and storage of your personal data

#### 4.3.1 Disclosure of data

Access to your data may be given both to bodies within and outside our company. Within the company, only offices or employees may process your data if they need it to fulfil our contractual, legal and supervisory obligations and to protect legitimate interests.

If business areas and services of the company are outsourced in whole or in part to external service providers or if these provide services (such as payment transactions, subscription and redemption of fund units, printing and dispatch of documents, IT systems and other support functions), this is done in accordance with the applicable legal provisions. All external service providers or vicarious agents to whom personal data is transferred are contractually obliged to maintain data protection, to process your data only within the scope of providing the service and to comply with data protection instructions and legal requirements. Processors may be companies in the categories of banking services, sales agreements, IT services, logistics, printing services, telecommunications, debt collection, advice and consulting as well as sales and marketing.

#### 4.3.2 Data deletion and storage

We process and store your personal data for the duration of the entire business relationship, i.e. from the initial initiation to the termination of the contract. After termination of a contract and thus with the discontinuation of the purpose of storage, the duration of storage is determined on the basis of statutory retention and documentation obligations. These retention periods are in some cases 10 years or more.

#### 4.3.3 Automated decision-making including profiling

As a matter of principle, our decisions are not based exclusively on automated processing of personal data. In particular, we do not use automated decision-making for the establishment and implementation of the business relationship. Nor do we use profiling measures.

## 5. Rights and obligations

### 5.1 Data protection rights available

#### 5.1.1 Right to confirmation

You have the right to request confirmation as to whether personal data relating to you is being processed. If you wish to exercise this right of confirmation, you may contact the data controller at any time.

#### 5.1.2 Right of access

You have the right to obtain information about the personal data stored about you and a copy of this information free of charge at any time. This right of access includes the following information:

- the purposes of processing
- the categories of personal data processed
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular in the case of recipients in third countries or international organisations
- if possible, the planned duration for which the personal data will be stored or, if this is not possible, the criteria for determining this duration
- the existence of the right to obtain the rectification or erasure of personal data concerning him or her, or the restriction of processing by the controller, or the right to object to such processing
- the existence of a right of appeal to a supervisory authority
- if the personal data are not collected from the data subject: any available information on the origin of the data
- the existence of automated decision-making, including profiling, pursuant to Article 22(1) and (4) of the GDPR and - at least in these cases - meaningful information about the logic involved and the scope and intended effects of such processing for the data subject.

Furthermore, you have the right to be informed whether personal data have been transferred to a third country or to an international organisation. If this is the case, you also have the right to obtain information about the appropriate safeguards in connection with the transfer.

If you would like to make use of this right to information, you can contact the data controller at any time.

#### 5.1.3 Right to rectification

You have the right to request that inaccurate personal data relating to you be rectified without delay. You also have the right to request that incomplete personal data be completed, including by means of a supplementary declaration, taking into account the purposes of the processing.

If you wish to exercise this right of rectification, you may contact the data controller at any time.

#### 5.1.4 Right to erasure

You have the right to have the personal data concerning you deleted without delay if one of the following reasons applies and insofar as the processing is not necessary:

- The personal data were collected or otherwise processed for purposes for which they are no longer necessary
- You have revoked your consent on which the processing was based pursuant to Art. 6 para. 1 lit. a DSGVO or Art. 9 para. 2 lit. a DSGVO and there is no other legal basis for the processing



- You object to the processing pursuant to Art. 21 (1) DSGVO and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Art. 21 (2) DSGVO
- The personal data has been processed unlawfully
- The erasure of the personal data is necessary for compliance with a legal obligation under Union or Member State law to which the controller is subject

If one of the above reasons applies and you wish to arrange for the deletion of personal data stored by our company, you can contact the controller at any time. The latter will arrange for the deletion request to be complied with immediately.

#### 5.1.5 Right to restrict processing

You have the right to request the restriction of processing if one of the following conditions is met:

- The accuracy of the personal data is contested for a period enabling the controller to verify the accuracy of the personal data
- The processing is unlawful, but you object to the erasure of the personal data and request instead the restriction of the use of the personal data
- The controller no longer needs the personal data for the purposes of the processing, but you need the personal data to assert, exercise or defend legal claims
- You have objected to the processing pursuant to Article 21(1) of the GDPR and it is not yet clear whether the legitimate grounds of the controller override those of the data subject

If one of the aforementioned conditions is met and you wish to request the restriction of personal data stored by our company, you may contact the controller at any time. The controller will arrange for the restriction of the processing.

The correction or deletion of data or a restriction of processing will be communicated to the recipients to whom personal data have been disclosed. This obligation to notify does not apply if this proves impossible or involves a disproportionate effort.

#### 5.1.6 Right of withdrawal

You have the right to revoke consent to the processing of personal data at any time. This also applies to the revocation of declarations of consent given before the DSGVO came into force, i.e. before 25 May 2018. Please note that the revocation only takes effect for the future. Processing that took place before the revocation is not affected. If you wish to exercise your right to withdraw your consent, you can contact the data controller at any time.

#### 5.1.7 Right to data portability

You have the right to receive the personal data concerning you that has been provided in a structured, common and machine-readable format. You also have the right to have this data transferred to another controller by the controller to whom the personal data was provided, provided that the processing is based on consent pursuant to Article 6(1)(a) of the GDPR or Article 9(2)(a) of the GDPR or on a contract pursuant to Article 6(1)(b) of the GDPR and the processing is carried out with the aid of automated procedures, unless the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

To assert the right to data portability, you can contact the controller at any time.

#### 5.1.8 Right of objection

You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is carried out on the basis of Article 6(1)(f) DSGVO.



Our company shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the assertion, exercise or defence of legal claims.

If our company processes personal data for the purposes of direct marketing, you have the right to object at any time to processing of personal data for the purpose of such advertising. If you object to our company processing your personal data for direct marketing purposes, we will no longer process the personal data for these purposes.

## 5.2 Exercise of rights

We accept requests for information in written, together with a clearly legible copy of a valid official form of identification (e.g. passport, identity card, driver's licence).

You can exercise other rights, such as the right to rectification, the right to erasure, the right to restriction of processing, as well as - where applicable - the right to data portability, by sending us a corresponding notification. Please address this notification to the controller within the meaning of the GDPR at the address given under point 3.

## 6. Right to complain to the supervisory authority

You have the right to lodge a complaint with a supervisory authority in an EU or EEA member state, in particular in your place of residence, place of work or the place of the alleged breach of the provisions of the GDPR. The supervisory authority responsible for our company is the Liechtenstein Data Protection Authority, Städtle 38, P.O. Box 684, 9490 Vaduz.

Should you require the contact details of a supervisory authority in another EU or EEA member state, you can contact the controller within the meaning of the GDPR at the address given under point 3.

## 7. Obligation to provide personal data

We inform you that the provision of personal data is sometimes required by law (e.g. tax regulations, money laundering prevention, etc.) or may also result from contractual regulations (e.g. information on the contractual partner). Sometimes it may be necessary for the conclusion of a contract that you provide us with personal data, which must subsequently be processed by us. For example, you are obliged to provide us with personal data if our company concludes a contract with you. Failure to provide the personal data would mean that the contract could not be concluded.

You are not obliged to give consent to data processing with regard to those data that are not relevant to the performance of the contract or are not required by law and/or regulation.

## 8. Contact form and contact via e-mail

The website of our company contains information that enables a quick electronic contact to our company as well as a direct communication with us, which also includes a general address of the so-called electronic mail (e-mail address). If you contact our company by e-mail or via a contact form, the personal data you provide will be stored automatically. Such personal data transmitted on a voluntary basis will be stored for the purpose of processing or contacting you. This personal data will not be passed on to third parties.



## 9. Information on the use of cookies

When accessing our website, the user is informed about the use of cookies for analysis purposes and his consent to the processing of personal data used in this context is obtained. In this context, a reference to this data protection declaration is also made.

### 9.1 Why are cookies used?

All of our company's websites use cookies for statistical purposes as well as to improve the user experience. By using this website, you consent to the use of cookies for this purpose.

### 9.2 What are cookies?

Cookies are text files that are stored on your electronic device to track your use of the e-services and your preference settings as you navigate between web pages and, where appropriate, to remember settings between your visits. Cookies help the developers of the electronic services to compile statistical information about the frequency of visits to certain areas of the website and help them to make the electronic services even more useful and user-friendly. A cookie contains a distinctive string of characters that allows the browser to be uniquely identified when the website is revisited.

Please note that most internet browsers automatically accept cookies. You can configure your browsers so that no cookies are stored on your electronic device, cookies can only be accepted by certain websites or there is always a notice before you receive a new cookie. If cookies are deactivated for our website, it may no longer be possible to use all the functions of the website to their full extent.

Through our website, we inform our customers and interested parties about the services and products of our company and offer information on specific topics. Contact details such as telephone number and e-mail address, etc. are also published on our website.