

# PRIVACY POLICY FOR WEBSITE VISITORS

## 1. Preamble

The companies Euro Treuhand AG und at4you AG, all domiciled at Rhigass 1, 9487 Gamprin-Bendern, Liechtenstein (hereinafter "Companies") process information and personal data that refer to you (hereinafter "Data Subject"). Basically, such information is processed by the Companies in the context of existing or intended business relations, including the use of websites. The Companies seek the best possible protection of your personal data.

Controller within the meaning of the European Union's General Data Protection Regulation GDPR (hereinafter "GDPR") is Euro Treuhand AG, Rhigass 1, 9487 Gamprin-Bendern, Liechtenstein. The Companies have appointed a joint Data Protection Officer (see item 9).

This Data Protection Policy (hereinafter "Policy") applies to the Companies. It describes the processing of personal data in connection with the provision of services by the Companies and their websites. The basis of this Policy is the GDPR, the Data Protection Act (DPA) and the relevant special statutory provisions.

The Companies reserve the right to adjust the Policy if necessary. In case of adjustments you should check if you agree to them.

## 2. Personal Data

Personal data is any information by which a natural person can be directly or indirectly identified. This includes, for example, name, address, e-mail address, telephone number, date of birth, age, gender and tax identification number. Sensitive data (a specially protected kind of data), such as health data or data related to criminal proceedings, is also included.

The Companies collect, process and use your personal data exclusively in accordance with the requirements of Art 5 and Art 6 GDPR (performance of a contract, legal obligation, vital interest or consent of the data subject).

Only that personal data is collected which is necessary for the performance and processing of our services or which is voluntarily provided by you.

## 3. Use of Personal Data

The companies are subject to occupational confidentiality and secrecy requirements, which can be derived from data protection law, contract law or occupational secrecy regulations. When processing personal data, the Companies are bound by these requirements. Personal data is processed (i) for the performance of a contract, (ii) for compliance with our legal or regulatory duties, (iii) for the pursuit of our legitimate interests and (iv) for observing public-interest requirements (such as the prevention or detection of criminal offenses).

## 4. Cookie

The Companies apply cookies to obtain information on how their websites are used. Cookies are small files stored on your computer that serve to store page information. Therefore, certain information doesn't need to be re-entered when visiting the websites again. You can prevent the application of cookies by adjusting your browser software and delete any cookies already set by a website of the Companies. By not taking these measures, you agree to the application of cookies when using the websites of the Companies.

On using the websites of the Companies, access data (e.g., log files, IP address, date and time of access, name of the accessed file, access status, top-level domain, web browser

used, operating system used) are stored. The Companies use this data for statistical purposes and for technical evaluations, for the optimization of the server infrastructure, for the calculation of access frequencies and finally for drawing conclusions on how to improve usability and functions.

**The following cookie types and functions are distinguished:**

- **Temporary cookies (also: session cookies):**  
Temporary cookies are deleted at the latest after a user has left an online offer and closed his browser.
- **First-Party-Cookies:**  
First-Party-Cookies are set by ourselves.
- **Necessary (also: essential or absolutely necessary) cookies:**  
Cookies may be absolutely necessary for the operation of a website (e.g. to store logins or other user inputs or for security reasons).

**Notes on legal bases:**

The legal basis on which we process your personal data with the help of cookies depends on whether we ask you for your consent. If this is the case and you consent to the use of cookies, the legal basis for processing your data is your declared consent. Otherwise, the data processed with the help of cookies will be processed on the basis of our legitimate interests (e.g. in a business operation of our online service and its improvement) or, if the use of cookies is necessary to fulfill our contractual obligations.

- **Processed data types:**

Usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).

- The type and version of browser used
- The used operating system
- Referrer URL
- The hostname of the accessing computer
- The time of the server inquiry
- The IP address

- **Affected persons:**

Users (e.g. website visitors, users of online services).

- **Legal basis:**

consent (Art. 6 para. 1 lit. a GDPR), legitimate interests (Art. 6 para. 1 lit. f. GDPR).

## **5. External links and data protection declarations**

This website may contain links to websites of other providers. Please be aware that we have no control over the content and privacy practices of these sites. If you click on an external link that leads to another website, we recommend that you check the privacy policy of that website. Each external provider has its own privacy policies and practices, which may differ from ours. We assume no responsibility or liability for the content or privacy practices of external websites. Your interaction with these linked websites is governed by the respective privacy policies of those sites.

## **6. Transmission of Personal Data to Third Parties**

Personal data collected as part of the business activities of the Companies is generally not disclosed to third parties.

In order to fulfill business assignments, it is however possible that your personal data is forwarded to third parties due to processing requirements or statutory provisions. Your personal data is forwarded according to the provisions of the GDPR.

Furthermore, we inform you that the Companies, as part of their business activities and in order to fulfill statutory due diligence requirements, may obtain information about you from third parties.

The Companies transmit your personal data only to countries to which the EU Commission attests an appropriate level of data protection. If the Companies submit your personal data to countries that do not have a reasonable, attested level of data protection, the Companies take steps to ensure that your personal data is protected by concluding an agreement with the recipients in those states on the basis of standard contractual clauses (2010/87 / EC [2]). and / or 2004/915 / EC [3]).

## **7. Protection of Personal Data**

The Companies take appropriate technical and organizational measures to protect any personal data from loss, unauthorized access or misuse, both in terms of data processing and data storage and in relation to their internet presence.

Notwithstanding the data protection measures taken, you must be aware that data transmission on the Internet - this is true both for websites and e-mail services - involves uncontrolled and cross-border transmission. Even if the sender and the recipient are in the same country, cross-border data transmission may be involved. Therefore, the Companies cannot guarantee the confidentiality of data transmitted on the internet. When you disclose personal information on the internet, you must be aware that third parties may access, read, modify, falsify, monitor, destroy or misuse this information. Data transmission may also be delayed. Moreover, data may be lost during transmission. Furthermore, third parties may draw conclusions about existing business relationships. Therefore, the Companies cannot take responsibility for the security of your data while it is being transmitted on the internet and disclaim all liability for direct and indirect damage. For data protection and security reasons, you are advised to contact the Companies through other or secure means of communication.

## **8. Personal Data Storage**

The Companies' systems required for data processing are located in Liechtenstein. The data transmitted by you will be kept for at least six months and stored for as long as it is operationally necessary or required by law.

## **9. Your Rights**

### **Right to Information**

You have the right to request information about your personal data that is stored by the Companies. A request for information, together with proof of identity, must be sent in writing to the Data Protection Officer.

Upon receipt of your request for information, you will be informed within the statutory period of 30 days. The information may be refused, restricted or postponed to the extent required by law or due to the prevailing interest of a third party or the company the request is addressed to.

The request for information may be combined with a request for rectification or erasure of data.

### **Right to Rectification or Erasure**

You have the right to request, in writing and free of charge, the rectification or erasure of your personal data, insofar as these are incorrect or stored or processed without good reason. A reasoned request for rectification or erasure must be sent to the Data Protection Officer, accompanied by a proof of identity.

Your request for rectification or erasure will be processed upon receipt within a reasonable time. Thereafter, the completion of your request for rectification or erasure will be confirmed to you.

Erasure may be prevented by legal regulations. In such a case, the Companies will process your personal data only to the extent necessary to comply with the statutory requirements.

### **Right of Objection or Cancellation**

You have the right to object in writing, in whole or in part, to the processing of your personal data or to cancel your consent to the processing of such data. The objection or cancellation must be addressed in writing to the Data Protection Officer.

The receipt of your objection or cancellation will be confirmed to you and thereafter the concerned data will be deleted.

To comply with an objection or cancellation may be contrary to statutory regulations. In such a case, the Companies will process your personal data only to the extent necessary to comply with the statutory requirements.

### **Right to Restriction**

You have the right to restrict the processing of your personal data with regard to the transmission of such data to third parties. An application for restriction must be sent in writing to the Data Protection Officer accompanied by proof of identity.

The receipt of your application for restriction will be confirmed and your application will be completed within a reasonable time.

Such restriction may conflict with legal regulations. In such a case, the Companies will only transmit your personal data to third parties to the extent necessary to comply with the statutory requirements.

### **Right of Complaint**

You have the right to file a complaint with the competent Liechtenstein supervisory authority. You may also contact another supervisory authority of an EU or EEA Member State, for example at your place of residence or work or at the place of the alleged infringement.

The contact details of the Data Protection Authority in Liechtenstein are as follows:

Liechtenstein Data Protection Authority  
Städtle 38  
P.O. Box 684  
9490 Vaduz  
Liechtenstein  
+423 236 60 90  
[info.dss@llv.li](mailto:info.dss@llv.li)

## **10. Contact**

For questions about data protection and data processing, please contact the Data Protection Officer of the controller in writing. You can contact our Data Protection Officer as follows:

Euro Treuhand AG  
Data Protection Officer  
Rhigass 1  
9487 Gamprin-Bendern  
Liechtenstein  
+423 388 10 60  
[datenschutz@eurotreuhand.com](mailto:datenschutz@eurotreuhand.com)