



Data protection declaration

Thank you for your interest in our company DRJ Holding Anstalt and their member companies ("DRJ HOLDING"). Data protection is important to us. Below you will find explanations on the subject of data protection based on the EU Basic Data Protection Regulation (DSGVO).

1. General

This data protection declaration provides information on how the member companies of DRJ Holding process personal data. The following companies belong to DRJ HOLDING:

- David Vogt & Partner Treuunternehmen reg.
- DRJ Holding Anstalt
- Hand in Hand Anstalt
- Vogt Asset Management AG

„Personal data” means any information relating to an identified or identifiable natural or legal person. “Processing” means any handling of personal data, irrespective of the means and procedures used, in particular the procurement, storage, use, modification, disclosure, archiving, deletion or destruction of personal data.

For certain data processing, e.g. in the context of concluding contracts with DRJ Holding or in connection with the websites of DRJ HOLDING, there are further regulations (e.g. terms of use). These are available in the relevant contracts or on the relevant websites. In addition, the General Terms and Conditions (GTC) contain general information on data protection.

2. Responsible and representative

DRJ Holding is responsible for processing your personal data. The contact details of DRJ Holding are as follows:

DRJ Holding Anstalt
Zweistäpfle 6
9496 Balzers
Principality of Liechtenstein

Phone: +423 388 07 70

e-mail: datenschutz@vogt.li



3. Categories of personal data

DRJ Holding processes the following categories of personal data. We always process as little personal data as possible.

Data of the partners of DRJ HOLDING, such as:

- Master and inventory data (e.g. name, address, nationality, date of birth, career)
- Technical data (e.g. business numbers, IP addresses, internal and external identifiers, access records)
- Image and sound data (e.g. video and voice recordings)
- Marketing data (e.g. preferences, needs)

Customer data, such as:

- Master and inventory data (e.g. name, address, nationality, date of birth, information regarding account, securities account, concluded transactions and contracts, information about third parties who are also affected by data processing, such as spouses, authorised representatives and consultants)
- Identification information (Identity documents including copies of passports and official ID papers, tax numbers, death certificates)
- Due diligence documentation (identification of contracting partners and beneficial owners, business relationship profiles, World-Check data, checks pursuant to the Liechtenstein Due Diligence Act [DDA; Sorgfaltspflichtgesetz – SPG])
- Transaction, order and risk management data (e.g. information on the beneficiaries of transfers, beneficiary bank, amount of transfers, risk and investment profile, information on investment products)
- Tax reporting data: Reports based on FATCA and the automatic exchange of information (AEOI)
- Correspondence (Client orders, general)
- Legal entity information (Articles of Association, by-laws, mandate contracts)
- Technical data (e.g. business numbers, IP addresses, internal and external identifiers, access records)
- Image and sound data (e.g. video and voice recordings)
- Marketing data (e.g. preferences, needs)

Visitor and interested party data (e.g. visitors of DRJ Holding or of websites of DRJ Holding), such as:

- Master and inventory data (e.g. name, address, date of birth)
- Technical data (e.g. IP addresses, internal and external identifiers, access records)
- Image data (e.g. video recordings)
- Marketing data (e.g. preferences, needs)



Supplier data, such as:

- Master and inventory data (e.g. name, address, date of birth, information on concluded transactions and contracts)
- Technical data (e.g. IP addresses, internal and external identifiers, access records)
- Image data (e.g. video recordings)

4. Origin of personal data

DRJ Holding may collect personal data from the following sources in order to fulfil the purposes set out in Section 5:

- Personal data provided to DRJ Holding, e.g. in connection with the opening of business relationships, the execution of contracts, the use of products and services or on websites.
- Personal data arising in connection with the use of products or services and transmitted to DRJ Holding through the technical infrastructure or through processes based on the division of labour, e.g. on websites or in connection with cooperation with other financial or IT service providers, marketplaces and stock exchanges, recordings (video/sound).
- Personal data from third parties, e.g. from authorities or sanction lists of the UN and the EU.

5. Purposes of processing

DRJ Holding can process personal data for the provision of its own services as well as for its own or statutory purposes. In particular:

- Conclusion and performance of contracts, execution, processing and administration of products and services (e.g. accounting, tax returns, commercial register entries and changes, invoices, account openings, payments, financing, financial planning, investments, provision, insurance, consolidation).
- Monitoring and controlling risks (e.g. investment profiles, combating money laundering, limits, utilisation figures, market, credit or operational risks).
- Statistics, planning, business decisions (e.g. development of new services, products, processes, technologies).
- Marketing, communication, information about the services offered and verification of the same (e.g. advertising in the print and online area, customer, prospective customer or other occasions, determination of future customer needs, assessment of customer, market or product potential).
- Fulfilment of legal or regulatory duties of disclosure, information or reporting to courts and authorities, fulfilment of official orders (e.g. reporting obligations to the FMA and foreign supervisory authorities, automatic exchange of information with foreign tax authorities, reporting obligations to the Office of Justice - List of beneficial owners, orders



of public prosecutor's offices in connection with money laundering and terrorist financing).

- Protecting the interests and securing the claims of DRJ Holding, e.g. in the case of claims against DRJ Holding or claims of DRJ Holding against third parties, prevention and investigation of criminal offences, video surveillance to safeguard house rights and the prevention of dangers, telephone recordings.

6. Disclosure to third parties, categories of recipients

DRJ Holding discloses customer data to the following third parties in the following cases:

- For outsourcing in accordance with Section 7 and for the purpose of comprehensive customer service to other service providers.
- For the execution of orders, i.e. for the use of products or services, e.g. to service providers, stock exchange or market places, notifications of stock exchange transactions to (international) trade repositories.
- Due to legal obligations, legal justification or official orders, e.g. to courts, supervisory authorities, tax authorities or other third parties.
- To the extent necessary to protect the legitimate interests of DRJ Holding, e.g. in the event of legal action threatened or initiated by customers against DRJ Holding, in the event of public statements, to secure DRJ Holding's claims against customers or third parties, in the collection of claims of DRJ Holding, etc.
- With the consent of the persons concerned to other third parties.

In particular when using certain products or services of DRJ Holding, personal data may also have to be disclosed to third parties in countries where there is no adequate level of data protection. If transmission to such a country is necessary, DRJ Holding will, if possible, take appropriate precautions to continue to adequately protect personal data.

7. Outsourcing of business areas or services

DRJ Holding outsources certain business areas and services in whole or in part to third parties (e.g. account management including payment transactions, custody account management, preparation of consolidation reports, fund limit checks, definitions of fund limit rules, opening of securities, updating of restriction rules, IT systems etc.).

The service providers who process personal data for this purpose on behalf of DRJ Holding (so-called contract processors) are carefully selected. Wherever possible, DRJ Holding uses contractors domiciled in Liechtenstein and Switzerland. Contract processors may be entitled to have certain services (e.g. electronic data processing, securities settlement, etc.) provided by third parties.

The contract processors may only process personal data received in the same way as DRJ Holding itself and are contractually obliged to guarantee the confidentiality and security of the data.



8. Automated decisions in individual cases including profiling

DRJ Holding reserves the right to process customer data automatically in the future, in particular to identify essential personal characteristics of the customer, to predict developments and to create customer profiles. This serves in particular the review and further development of offers and the optimization of service provision.

9. Use of our websites

When visiting websites of DRJ Holding, the web server automatically registers details of your visit (e.g. the website from which the visit takes place, the IP address of the visitor, the contents of the website that are accessed, including date and duration of the visit).

When you visit the DRJ Holding websites, your browsing behaviour may be analysed for statistical purposes. This is primarily done using so-called analytics tools.

Detailed information about these analytics tools is summarised below.

a) External Hosting

DRJ Holding's websites are hosted externally. The personal data collected on these websites is stored on the servers of a hosting provider. This may include, in particular, IP addresses, contact enquiries, metadata and communication data, contractual data, contact details, names, website visits and other data generated via a website.

External hosting is carried out for the purpose of fulfilling contracts with potential and existing customers (Art. 6(1)(b) GDPR) and in the interest of providing a secure, fast and efficient online service through a professional provider (Art. 6(1)(f) GDPR).

Where consent has been sought, processing is carried out exclusively on the basis of Article 6(1)(a) of the GDPR. Consent may be withdrawn at any time.

The hosting provider will only process data to the extent necessary to fulfil its contractual obligations and will comply with our instructions regarding such data.

We use the following hosting provider:

walsermedia AG
Meierhofstrasse 4
9490 Vaduz
Liechtenstein



walsermedia may use subcontractors who are technically necessary for the provision of its services. An up-to-date list of the subcontractors used is available in walsermedia's Trust Centre: <https://trust.walsermedia.com>

b) Cookies

DRJ Holding uses cookies on their websites to ensure a user-friendly experience. Cookies are small files that are managed by the user's web browser and are directly stored on the respective device (Laptop, Tablet, Smartphone etc.) whenever you visit websites of the DRJ Holding. Cookies are stored as long as you do not delete them. This process allows DRJ Holding to recognize your browser on your next visit.

If you do not wish to use cookies you can change the settings in your browser accordingly. You will then be notified whenever your browser attempts to create a cookie and you can decide whether you want to allow the cookie. However, please note that a deactivation of cookies may result in a limited user experience and you may not be able to use every function of our websites.

c) Contact form

If you fill out a contact form, send an e-mail or another form of electronic message to DRJ Holding, your data will only be used to process your inquiry and possible further questions you might have.

d) Server log files

The provider of the websites of DRJ Holding and its pages automatically collects and stores information in so-called server log files, which your browser communicates to us automatically. The information comprises:

- 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

This data is not merged with other data sources.

The operator of the websites has a legitimate interest in the technically error free depiction and the optimization of the operator's website. In order to achieve this, server log files must be recorded.



e) WordFence

DRJ Holding has integrated Wordfence into its websites. The provider is Defiant Inc., Defiant, Inc., 800 5th Ave Ste 4100, Seattle, WA 98104, USA (hereinafter “Wordfence”).

Wordfence serves to protect DRJ Holding’s websites from unauthorised access or malicious cyber attacks. To this end, DRJ Holding’s websites establish a permanent connection to Wordfence’s servers so that Wordfence can compare its databases with the access attempts made on its websites and block them where necessary.

The use of Wordfence is based on Article 6(1)(f) of the GDPR. The website operator has a legitimate interest in protecting its websites as effectively as possible against cyber attacks. Where consent has been sought, processing is carried out exclusively on the basis of Article 6(1)(a) of the GDPR and Section 25(1) of the TDDDG, insofar as the consent covers the storage of cookies or access to information on the user’s device (e.g. device fingerprinting) within the meaning of the TDDDG. Consent may be withdrawn at any time.

Data transfers to the USA are based on the EU Commission’s Standard Contractual Clauses. Details can be found here: <https://www.wordfence.com/help/general-data-protection-regulation/>.

f) Matomo

The DRJ Holding websites use the open-source web analytics service Matomo.

Matomo is used to collect and analyse data on how visitors use the DRJ Holding websites. This makes it possible, amongst other things, to determine when specific pages were viewed and from which region the visitors are accessing the site. In addition, various log files are recorded (e.g. IP address, referrer, browsers and operating systems used) and it is measured whether visitors to the DRJ Holding websites perform certain actions (e.g. clicks, purchases, etc.).

The use of this analytics tool is based on Article 6(1)(f) of the GDPR. The website operator has a legitimate interest in analysing user behaviour in order to optimise both its website and its advertising. Where consent has been obtained, processing is carried out exclusively on the basis of Article 6(1)(a) of the GDPR. Consent may be withdrawn at any time.

IP anonymisation is used when analysing data with Matomo. This involves truncating the IP address prior to analysis so that it can no longer be uniquely identified.

Matomo has been configured so that it does not store any cookies in users’ browsers.

Matomo is hosted by the following third-party provider:

walsermedia AG
Meierhofstrasse 4
9490 Vaduz
Liechtenstein



g) Newsletter data

If you subscribe to newsletters offered on the DRJ Holding websites, an email address and information are required to verify that the owner of the email address provided consents to receiving the newsletter. No further data is collected, or is collected only on a voluntary basis. The newsletter service providers described below are used to manage the newsletters.

Brevo

The DRJ Holding websites use Brevo to send newsletters. The provider is Sendinblue GmbH, Köpenicker Straße 126, 10179 Berlin, Germany.

Brevo is a service that can be used, amongst other things, to organise and analyse the sending of newsletters. The data entered for the purpose of subscribing to the newsletter is stored on the servers of Sendinblue GmbH in Germany.

Brevo enables the analysis of newsletter campaigns. For example, it is possible to see whether a newsletter message has been opened and which links, if any, have been clicked. In this way, it is possible to determine, amongst other things, which links have been clicked particularly frequently.

You can also see whether certain predefined actions were carried out after the newsletter was opened or clicked on (conversion rate). For example, you can see whether a purchase was made after the newsletter was clicked on.

Brevo also allows newsletter recipients to be divided into different categories ('clustered'). Recipients can be grouped, for example, by age, gender or place of residence. This makes it easier to tailor newsletters to specific target groups.

If you do not wish Brevo to carry out this analysis, you must unsubscribe from the newsletter. A link for this purpose is provided in every newsletter message.

Detailed information on Brevo's functions can be found at the following link: <https://www.brevo.com/de/newsletter-software/>.

Data processing is carried out on the basis of consent (Art. 6(1)(a) GDPR).

The data provided for the purpose of subscribing to the newsletter will be stored by the newsletter service provider until you unsubscribe from the newsletter, and will be deleted from the newsletter distribution list once you have unsubscribed. Data stored for other purposes remains unaffected by this. (See section 11.)

After unsubscribing from the newsletter distribution list, the email address may be stored on a blacklist by DRJ Holding or the newsletter service provider, if necessary, insofar as this is required to prevent future mailings. The data from the blacklist is used solely for this purpose and is not merged with other data. This serves both the interests of the newsletter recipient and the interests of DRJ Holding in complying with legal requirements when sending newsletters (legitimate



interest within the meaning of Article 6(1)(f) of the GDPR). Storage on the blacklist is not time-limited. You may object to this storage provided that the interests of the newsletter recipient outweigh the legitimate interest.

Further details on Brevo's privacy policy can be found at:
<https://www.brevo.com/de/datenschutz-uebersicht/> and
<https://www.brevo.com/de/legal/privacypolicy/>.

h) Google reCAPTCHA

DRJ Holding uses "Google reCAPTCHA" (hereinafter "reCAPTCHA") on its websites. The provider is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

The purpose of reCAPTCHA is to verify whether a visit to DRJ Holding's websites is made by a human or by an automated programme. To this end, reCAPTCHA analyses the behaviour of the website visitor based on various characteristics. This analysis begins automatically before the website visitor enters the website. For the analysis, reCAPTCHA evaluates various pieces of information (e.g. IP address). The data collected during the analysis is forwarded to Google.

The reCAPTCHA analyses run via an intermediate page that is displayed to the website visitor and indicates that the analysis is in progress.

In this context, Google acts purely as a data processor within the meaning of Article 28 of the GDPR and will not use the data collected in this way for its own purposes.

The storage and analysis of the data is based on Article 6(1)(f) of the GDPR. The website operator has a legitimate interest in protecting its web services from abusive automated access, bot attacks and DDoS attacks.

The company is certified under the 'EU-US Data Privacy Framework' (DPF). The DPF is an agreement between the European Union and the US designed to ensure compliance with European data protection standards when data is processed in the US. Every company certified under the DPF undertakes to comply with these data protection standards. Further information on this is available from the provider via the following link:
<https://www.dataprivacyframework.gov/participant/5780>.

DRJ Holding's hosting provider has entered into a data processing agreement (DPA) for the use of the aforementioned service. This is a contract required under data protection law, which ensures that the provider processes the personal data of DRJ Holding's websites visitors only in accordance with DRJ Holding's instructions and in compliance with the GDPR.

10. Data protection for applications and in the application process

DRJ Holding collects and processes personal data of applicants for the purpose of processing the application. Processing may be carried out on paper or electronically by e-mail or by filling in a web form. If an employment contract is concluded with an applicant, the



personal data received will be processed for the purpose of processing the employment relationship in compliance with regulatory obligations. Otherwise, the application documents will be deleted three months after rejection, provided that no legitimate interests on part of DRJ Holding prevail.

11. Storage period

The duration of the storage of personal data depends on the purpose of the respective data processing and/or legal storage obligations, which amount to five, ten or more years depending on the applicable legal basis.

12. Your rights

- You have the right at any time and free of charge to request information from DRJ Holding about the personal data we have stored about you, as well as about its origin, recipients or categories of recipients to whom this personal data is passed on and the purpose of its storage.
- You also have the right to demand that DRJ Holding corrects, deletes or restricts the processing of your personal data at any time. DRJ Holding commits itself to do so, unless there is a contrary legal obligation on their part.
- You also have the right to object to the processing of your personal data by DRJ Holding at any time. DRJ Holding commits itself to do so, unless there is a contrary legal obligation on their part. The cancellation of the data may result in DRJ Holding being unable to provide certain services.
- If you have given consent to the use of personal data to DRJ Holding, you can revoke it at any time without giving reasons.

If you wish to exercise any of the above rights, please contact the address provided in section 2.

Requests for information will be accepted in writing, together with a legible copy of a valid official identity document.

- Furthermore, you have the right to complain directly to the data protection office of Liechtenstein, Kirchstrasse 8, Postfach 684, 9490 Vaduz, Principality of Liechtenstein, Phone: +423 236 60 90, e-mail: info.dss@llv.li.

13. Data security

DRJ Holding undertakes to protect personal data and privacy in accordance with the applicable laws, in particular through professional secrecy and data protection law. For this purpose, DRJ Holding takes various technical and organisational security measures (e.g. access restrictions,



firewalls, personalised passwords as well as encryption and authentication technologies, staff training etc.).

14. Changes

As part of the technical development of the range of services of DRJ Holding and the legal framework, DRJ Holding will also continuously adapt their data protection declaration. Changes to the data protection declaration will be published on websites of DRJ Holding for this purpose. Please therefore regularly read the current version of this data protection declaration in force as soon as the updated data protection declaration is published. If we have already collected data about you and/or are subject to a statutory duty to provide information, we will also inform you of any significant changes to our data protection declaration and ask for your consent in case this should be required by law.

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