

## **Data protection declaration**

### **1. General**

This data protection declaration provides information on how the member companies of David Vogt Holding ("Vogt Holding") process personal data. The following companies belong to Vogt Holding:

David Vogt Holding Anstalt  
David Vogt & Partner Treuunternehmen reg.  
DJD Partners Trust reg.  
Vogt Asset Management Trust reg.  
Vogt Family Office AG  
DV Immobilien Trust reg.  
Hand in Hand Anstalt

« 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 Vogt Holding or in connection with the websites of Vogt 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. Data security**

Vogt 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, Vogt 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.).

### **3. Categories of personal data**

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

Data of the partners of Vogt 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)
- 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)
- 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)

- Technical data (e.g. business numbers, IP addresses, internal and external identifiers, access records)
- Marketing data (e.g. preferences, needs)

Visitor and interested party data (e.g. visitors of Vogt Holding or of websites of Vogt 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)
- 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)

#### **4. Origin of personal data**

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

- Personal data provided to Vogt 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 Vogt 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.
- Personal data from third parties, e.g. from authorities or sanction lists of the UN and the EU.

#### **5. Purposes of processing**

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

- Protecting the interests and securing the claims of Vogt Holding, e.g. in the case of claims against Vogt Holding or claims of Vogt Holding against third parties.

## **6. Disclosure to third parties, categories of recipients**

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

- For outsourcing in accordance with item 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 Vogt Holding, e.g. in the event of legal action threatened or initiated by customers against Vogt Holding, in the event of public statements, to secure Vogt Holding's claims against customers or third parties, in the collection of claims of Vogt Holding, etc.
- With the consent of the persons concerned to other third parties.

In particular when using certain products or services of Vogt 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, Vogt Holding will, if possible, take appropriate precautions to continue to adequately protect personal data.

## **7. Outsourcing of business areas or services**

Vogt 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 Vogt Holding (so-called order processors) are carefully selected. Wherever possible, Vogt Holding uses contractors domiciled in Liechtenstein and Switzerland. Order processors may be entitled to have certain services (e.g. electronic data processing, securities settlement, etc.) provided by third parties.

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

## **8. Automated decisions in individual cases including profiling**

Vogt 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 websites and cookie policy**

When a person visits websites of Vogt Holding, the web server automatically registers details of their 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). Such tracking data serve to

optimize the websites of Vogt Holding and provide information on how visitors inform themselves about and use the products, services and offers of Vogt Holding. As a rule, however, they do not allow any conclusions to be drawn about the identity of the visitor. In this respect, no personal data will be processed.

However, if the visitor provides personal data, e.g. by filling out a registration form or message field for newsletters etc., Vogt Holding may use this data in addition to the purposes mentioned under item 5 in particular for the following purposes:

- for customer and user administration;
- to inform the visitor about services and products;
- for marketing purposes (e.g. sending newsletters);
- technical "hosting" and the further development of the websites of Vogt Holding.

When visiting the websites of Vogt Holding, the visitor's data is transported via the Internet, i.e. an open network accessible to everyone. Data transmitted via electronic media (including e-mail) cannot be effectively protected against access by third parties. Among other things, this involves the risk that the data may be disclosed or the content changed, that the identity of the sender (e.g. e-mail) as well as the content of the message may be simulated or otherwise manipulated by unauthorized persons, that viruses may be released, that technical transmission errors, delays or interruptions may occur, that data may be sent abroad without control, where lower data protection requirements may apply than in Liechtenstein, etc., etc.

By using the websites of Vogt Holding, a visitor confirms his express agreement with this data protection declaration and the risks mentioned.

In addition, by using the Vogt Holding website, a visitor agrees to the use of cookies. Cookies are small files that are stored on the visitor's computer in order to track the corresponding website visit and navigation between different pages and/or to save settings (e.g. selected language). Cookies are used to collect statistical data about the frequency and time of visits to individual areas of the website and help to design tailor-made, useful and user-friendly websites. The visitor can decide at any time against the use of cookies by deleting the cookies set by the Vogt Holding website. Deletion is possible via the settings in the visitor's Internet browser.

Occasionally Vogt Holding uses third party components (such as plug-ins) to improve the user experience and online advertising campaigns. These components may also use cookies for similar purposes. Neither these third parties nor Vogt Holding have access to the data collected by the other via cookies. Finally, Vogt Holding also uses cookies in the context of advertisements of Vogt Holding on third-party websites with which Vogt Holding maintains marketing relationships. If third parties collect anonymous information about the use of the websites of Vogt Holding and other websites, Vogt Holding can use this anonymous data to improve the effectiveness of advertising.

This title of this data protection declaration only applies to data that Vogt Holding receives as a result of the use of Vogt Holding websites. It is not applicable to websites of third parties, even if the visitor reaches them via links on a website of Vogt Holding. Vogt Holding has no influence on the content and data protection handling of third party websites and cannot assume any responsibility for these.

## **10. Storage time**

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.

## **11. Rights of data subjects**

Everyone can request information from Vogt Holding as to whether personal data about him or her are being processed. Incorrect data can be corrected. Furthermore, the deletion of personal data may be requested, unless legal or regulatory regulations (e.g. statutory retention obligations for business-relevant data) or technical hurdles stand in the way. The deletion of data may result in Vogt Holding no longer being able to provide certain services.

Requests for information are accepted in writing, together with a legible copy of a valid official ID.

## **12. Contact**

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

David Vogt Holding Anstalt  
Zweistäpfle 6  
9496 Balzers  
Principality of Liechtenstein