



## Data Protection Notice

Valid from 14.09.2018

The following data protection notice (referred to as "notice») describes how personal data is handled and later processed by Zehenter & Partner Invest AG (referred to as «ZPI») in the course of their daily business. The valid laws and regulations regarding data protection in Liechtenstein apply. ZPI especially points out the terms and your rights in relation to the EU General Data Protection Regulation (GDPR) and the Liechtenstein Data Protection Act (DPA):

ZPI reserves the right to amend this notice at any time and recommends to visit the company website [ww.zpi.li](http://ww.zpi.li) regularly to check for updates. ZPI is legally bound to protect your privacy and keep your information confidential and will therefore implement a range of technical and organizational measures to ensure data security for all processing of personal data.

ZPI informs you upfront about your right to withdraw your consent according with the GDPR. Nevertheless, ZPI points out, that in the course of its regular business personal data is required for the purpose of setting up and conducting client business relationships, meeting applicable statutory or contractual requirements, providing services and executing orders. Without having this data, ZPI would generally be unable to enter into or maintain a business relationship.

If you still wish to withdraw your consent, please send your objection in written to the address mentioned under point 7. In case no objection is received your consent to collect, store and process your data in accordance with the hereafter explained terms and conditions is assumed.

Please note as well our disclaimer in regard to our company website, which you can find in the imprint. It captures all relevant information about the terms and conditions of use as well as all relevant details to data collection and processing on the ZPI website.

### 1. What categories of data are referred to as personal data?

In general, personal data is always related to a specific person and concerns the following categories of master data in particular: name, e-mail address, phone number, date of birth, nationality, IBAN, IP address, tax identification number, etc.. Special personal data include information about ethnic and cultural origin, political, religious and philosophical opinions, health, sexuality, etc.. These data are especially sensitive and therefore particularly worthy of protection. In addition, further basic data is seen as personal data, for example information about used services and products, information about the clients' life, household, work and financial situation, authorised signatories as well as image and sound files from conversation recording if applicable.

### 2. What personal data is collected and for which purpose will it be used?

ZPI collects and processes collect and process personal data that is obtained in the course of its business relationship with its clients. Generally but not exhaustive, ZPI processes personal data that you provide in the course of submitting agreements/ contracts, forms, correspondence or other documents from third parties, which are necessary to perform our services. Personal data are an essential part to perform our services for our clients, which make the primary tasks and responsibilities of an asset management company (risk assessment, suitability of strategies and investments, individual customer service, etc.) possible in the first place.

In addition, there are regulatory and legal requirements for licenced asset management companies to collect, process and forward certain personal data. Special personal data as mentioned under point 1 are not collected by ZPI. Apart from client data, we may, where appropriate, also process personal data of other third parties involved in the business relationship, including data pertaining to (further) authorized agents, representatives, legal successors or beneficial owners under a business relationship. Please ensure that such third parties are also aware of this data protection notice.

In general, ZPI does not make decisions based solely on the automated processing of personal data. We will inform you separately in accordance with the statutory regulations of any intention to use this method in particular circumstances.

### 3. Who has access to personal data?

Personal data collect in the course of daily business by ZPI is not forwarded to any third party, except

- you explicitly confirm the forwarding and access to your personal data by the respective third party;
- doing so is necessary in order to perform services for the clients (in particular other financial institutions, custody banks, stock exchanges, etc.);
- ZPI is obligated by law to make the data accessible for public authorities; or
- the data processing is done on behalf and order of ZPI by a third party contractually bound to confidentiality of the provided data.

Parties, which are directly or indirectly linked to ZPI are not referred to as third parties, as stated before.

### 4. How will your personal data be protected?

In the course of daily business as well as the data processing adequate and various technical and organizational measures to



ensure data security, to prevent data loss or data abuse are implemented.

Regardless of any undertaken measures for data security, you have to be aware of the fact, that data transmission via internet – on website as well as by mail – is uncontrolled and can be cross-border. Even though sender and receiver are located in the same country, the transmission can happen cross-border. If you disclose personal data in the internet, you have to be aware, that third parties can access, read, alter, falsify, monitor, destroy or abuse these data. The data transmission can additionally be delayed, or the data can be lost while transmitting. As a matter of fact, ZPI and any directly or indirectly linked company, does not take any responsibility data transmission in the internet and ZPI cannot be held liable for any indirect and direct damage caused by doing so.

#### **5. Where and how long are personal data stored?**

All technical systems for data processing are primarily located in Liechtenstein, or at least in the European Union. All personal data provided by you and collected by ZPI is stored as long as necessary for the given purpose, and/or as long as ZPI is obligated to do so by law in regard to documentation duties and retention periods.

#### **6. Which rights do you have?**

##### Access and data portability:

You may obtain information from ZPI about whether and to what extent personal data concerning you are being processed (e.g. categories of personal data being processed, purpose of processing, etc.). The request has to be send with a valid copy of your identification card to data protection manager at ZPI, as mentioned under point 7. After receiving your request, you will get a response within the legal timeframe of 30 (thirty) days. The disclosure of information can be refused, limited or deferred if legally required or due to substantial and prevailing interest of third parties. You have the right to receive the personal data concerning you, which you have provided to the controller, in a structured, commonly used and machine-readable format, and to have the data transmitted to another controller.

##### Rectification or erasure:

You have the right to obtain the rectification of inaccurate or incomplete personal data concerning you. In addition, your personal data must be erased if the data are no longer necessary in relation to the purposes for which they were collected or processed, if you have withdrawn your consent, or if the data have been unlawfully processed. The request has to be send with a valid copy of your identification card to data protection manager at ZPI, as mentioned under point 7. Your request will be processed in lawful time and the settling of the matter will be confirmed in written to you. Several legal requirements regarding data processing might limit the possibility of erasure. In that case ZPI will only process personal data related to you as to extend ZPI is obligated by law to do so.

##### Withdraw of consent and right to object:

You have the right to withdraw your consent to the processing of personal data concerning you for one or more specific purposes at any time, where the processing is based on your explicit consent. You have the right to object, on grounds relating to your particular situation, without any formal requirements, to the processing of personal data concerning you, if such processing is in the public interest or in pursuit of the legitimate interests of the Asset Management Company or a third party. Please note that consent may only be withdrawn with effect for the future and does not affect any data processing undertaken prior to withdrawing consent. Moreover, the withdrawal of consent has no effect in relation to data processing undertaken on other legal grounds. The request has to be send with a valid copy of your identification card to data protection manager at ZPI, as mentioned under point 7.

##### Restriction of processing:

You also have the right to obtain restriction of processing and forwarding your data to third parties. The request has to be send with a valid copy of your identification card to data protection manager at ZPI, as mentioned under point 7. Your request will be processed in lawful time and the settling of the matter will be confirmed in written to you. Several legal requirements regarding data processing might limit the possibility of data processing restriction. In that case ZPI will only forward personal data related to you as to extend ZPI is obligated by law to do so.

Please note, that an erasure, withdrawal of consent, restriction or objection will strictly limit ZPI's possibilities to provide you with necessary services. In the course of ZPI's regular business personal data is required for the purpose of setting up and conducting client business relationships, meeting applicable statutory or contractual requirements, providing services and executing orders. Without having this data, ZPI would generally be unable to enter into or maintain a business relationship.

#### **7. Further questions to data security and protection?**

If you have any further questions regarding data protection or data processing please send us your request in written to the following address:

Zehenter & Partner Invest AG  
co/ Data Protection Manager  
Im alten Riet 153, 9494 Schaan, Liechtenstein  
[office@zpi.li](mailto:office@zpi.li)

or visit our website [www.zpi.li](http://www.zpi.li) for more contact details and information. In addition, our relationship managers are happy to answer your questions.