



## **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:

- DRJ HOLDING ANSTALT
- David Vogt & Partner Treuunternehmen reg.
- Vogt Asset Management AG
- Vogt Family Office AG
- 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 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](mailto: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)
- 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)
- 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)
- 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**

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.
- 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.

#### **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).



#### **a) 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.

#### **b) 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.

#### **c) 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.

#### **d) Adobe Typekit Web Fonts**

In order to ensure the uniform depiction of certain fonts, the websites of DRJ HOLDING use fonts called Adobe Typekit Web Fonts provided by Adobe Systems Incorporated, 345 Park Avenue, San Jose, CA 95110-2704, USA (Adobe).

When you access pages of websites of the DRJ HOLDING, your browser will automatically load the required fonts directly from the Adobe site to be able to display them correctly on your device. As a result, your browser will establish a connection with Adobe's servers in the United States. Hence, Adobe learns that your IP address was used to access our website. According to the information provided by Adobe, no cookies will be stored in conjunction with the provision of the fonts.



Adobe is in possession of a certification in accordance with the EU-US Privacy Shield. The Privacy Shield is a compact ratified between the United States of America and the European Union, aiming to warrant compliance with European Data Protection Standards. For more information, please follow this link: <https://www.adobe.com/de/privacy/eudatatransfers.html>.

The use of Adobe Typekit Web Fonts is necessary to ensure the uniform presentation of fonts on the websites of DRJ HOLDING.

For more information about Adobe Typekit Web Fonts, please read the policies under: <https://www.adobe.com/de/privacy/policies/typekit.html>.

Adobe's Data Privacy Declaration may be reviewed under: <https://www.adobe.com/de/privacy/policy.html>.

#### **e) Google Maps**

Via an API, the websites of DRJ HOLDING use the mapping service Google Maps. The provider is Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

To enable the use of the Google Maps features, your IP address must be stored. As a rule, this information is transferred to one of Google's servers in the United States, where it is archived. The operator of this website has no control over the data transfer.

The DRJ HOLDING uses Google Maps to present the online content in an appealing manner and to make the locations disclosed on the websites of DRJ HOLDING easy to find.

For more information on the handling of user data, please review Google's Data Privacy Declaration under: <https://policies.google.com/privacy?hl=en>.

#### **f) WordFence**

The websites of DRJ HOLDING use the wordpress plugin WordFence for security purposes. Provider is Defiant, Inc., 800 5th Ave Ste 4100, Seattle, WA 98104, United States. The plugin protects the websites from attempts by third parties to gain unauthorized access to the websites and thereby gain access to personal data, to integrate malicious software on the websites or to carry out other illegal activities.

To use the security plugin WordFence it is necessary to save your IP address. This information is also transmitted to a Defiant server in the US and stored there. The provider of this site has no influence on this data transfer.

Defiant has applied for certification under the EU-US Privacy Shield (as of June 6, 2018). The Privacy Shield is an agreement between the European Union (EU) and the US to ensure compliance with European privacy standards in the United States.

DRJ HOLDING uses WordFence to increase the security of the websites and thus also for the safety of website users.



More information on how to deal with user data can be found at <https://www.wordfence.com/blog/2018/05/wordfence-is-gdpr-compliant/> and in Defiant's privacy policy: <https://www.wordfence.com/privacy-policy/>

## **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, Städtle 38, Postfach 684, 9490 Vaduz, Principality of Liechtenstein, Phone: +423 236 60 90, e-mail: [info.dss@llv.li](mailto: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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