

PRIVACY POLICY

01.12.2018 Version

At OZL Offenes Zolllager in Liechtenstein AG („OZL AG“), the protection of personal data is given top priority. The collection of personal data by OZL AG is done in accordance with the statutory provisions of the European General Data Protection Regulation (GDPR) and with national legislation currently in force. Compliance with statutory provisions governing data protection and data security is given as far as we are concerned. The purpose of this privacy policy is to give you an overview of the processing of your personal data by OZL AG and of your rights. Since the type of data processing depends on the agreed services to be provided, not all indications and information shall necessarily fully apply to you.

OZL AG is pleased to provide you hereafter with information in accordance with GDPR and with national legislation currently in force. Where they are legal persons, contractual and business partners are asked to bring this privacy policy to the attention of the persons concerned (e.g. firms' executive bodies and staff).

A. Data controller and point of contact:

OZL AG

Axel Diegelmann

Im Schliessa 16

9495 Triesen

Liechtenstein

Email: info@ozl.li

Telephone: [+423] 392 61 01

B. processing of personal data:

1. Which categories of personal data are collected?

We collect the following categories of personal data on you:

- (a) name, contact details, home and/or business address, email address, telephone number, fax number, proof of identity (e.g. identification data), authentication data (e.g. specimen signature);
- (b) identity and biographical information, including nationality, date of birth, tax return details, passport details, place of residence, civil status, current and former occupation, together with further, relevant information required to provide our services and complete our assignment;
- (c) information on your net asset position such as, for example, income, outgo, assets and debts, information on the source of the assets, the bank account and other information required for processing the payment and combating fraud and money-laundering (e.g. via a World Check enquiry);

2. How are your personal data collected?

- 2.1. OZL AG processes personal data that we receive from customers or third parties (e.g. intermediaries, collaboration partners, etc.) through our business dealings with them. Publicly available sources (e.g. companies' registers, media, etc.) may moreover provide personal data, which is then processed by us.

3. What is the basis for processing your personal data and how are these data used?

3.1 We process your personal data to:

- (a) submit a quotation to you in relation to the services to be provided and assignments to be performed by us (including

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the completion of background checks);

- (b) ensure that we provide our services and perform our assignments (including any related consultancy activities) and that we maintain industry standards;
- (c) look after and administer the customer relationship (including billing) and for reasons of documentation;
- (d) exercise and defend our lawful rights;
- (e) observe statutory and regulatory obligations such as any duties of care pursuant to SPG [Due Diligence Act] and/or SPV [Due Diligence Ordinance] and other legislation serving to combat money laundering and the funding of terrorism, data protection laws, duties of disclosure for the purposes of tax law and/or to assist investigations by the police and/or any other relevant competent authority (justified in conducting such an investigation by corresponding legislation) and to comply with court injunctions and court orders
- (f) to ensure the security of our system and our communications;
- (g) for general security reasons and to guarantee the safety of our staff and visitors;
- (h) for all other reasons for which you provide us with personal data.

3.2 We process your personal data for the aforementioned reasons, provided one (or more) of the following reasons applies:

- (a) processing is necessary for the performance of the contractual relationship with the customer;
- (b) processing is necessary to ensure that we can comply with our legal obligations;
- (c) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us;
- (d) processing is necessary to safeguard our legitimate interests (including business development), except where such interests are overridden by your legitimate interests (e.g. a fundamental right); and/or
- (e) you have expressly consented to the use of the data.

4. With whom may we share your personal data?

4.1 Your personal data may be shared with:

- (a) businesses with which OZL AG is in a relationship of cooperation;
- (b) third parties who support us in the provision of our services and performance of our assignments, such as for example lawyers, accounting firms, logistics, telecommunications and IT providers, and other consultants, translators, consultancy, distribution or marketing firms, or collections and/or messenger services;
- (c) intermediaries whom we introduce to you;
- (d) third party providers who have business dealings with us, as well as service providers for anti-money-laundering and background checks services, who perform data processing tasks on our behalf, banks and insurance companies;

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- (e) public bodies, institutions, authorities, courts in connection with meeting contractual and statutory obligations and safeguarding contractual and statutory rights.

5. Transfer of data abroad and/or to international organisations:

- 5.1. A data transfer to countries outside the EEA (third countries) shall take place in principle only if this is necessary for the performance of the contract, if it is prescribed by law (e.g. combating money laundering, the funding of terrorism and other criminal acts) or if you have given us your consent. A transfer shall however only be made to third countries that are included within the scope of the Commission's adequacy decision as related to the level of data protection, i.e. in compliance with the European level of data protection.

6. For how long will your personal data be stored?

- 6.1. Your personal data will be stored for as long as is necessary to meet the purposes set out in this privacy policy.
- 6.2. In some cases, this signifies that we shall have to store your personal data for the same period of time as your documents or a copy of your documents. Usually, this is a period of no more than 10 years from the conclusion of the relevant matter.
- 6.3. The storage of your data for a period longer than the period set out above may be appropriate, e.g. for the exercise or defence of our statutory rights. If there is no lawful ground for storage, we shall erase your personal data or, in some cases, anonymise the data.

C. Your rights:

- 1.1 You have the following rights with regard to your personal data:

- Right to information,
- Right to rectification or erasure,
- Right to restriction of processing,
- Right to object to processing,
- Right to data portability.

- 1.2 If you have consented to the processing of your data, you may withdraw your consent at any time. The withdrawal may be made informally by writing to OZL AG at its address or by email to info@ozl.li.

- 1.3 When processing your personal data, we endeavour to take all interests into consideration, nevertheless you shall have the right to object to the processing. This is particularly the case if the processing is not required for the performance of the contract with you. If you do object to the processing, we would ask you to let us know the reason for your withdrawal of consent. If your withdrawal is justified, we shall check the situation and either cease processing the data, adapt the process or notify you of the lawful grounds on the basis of which we shall continue to process the data. This shall not affect the lawfulness of the data processing that has taken place up until receipt of the withdrawal.

- 1.4 If you are of the opinion that our data processing breaches data protection law currently in force or somehow infringes your personal right to data protection, you shall have the right to refer the matter to the competent authority. In Liechtenstein, this is:

Datenschutzstelle [data protection authority]
Städtle 38,
9490 Vaduz,
Liechtenstein

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D. Statutory or contractual obligation to provide data:

- 1.1 Personal data are necessary for conclusion of the contract. For this reason, you must provide the personal data that are required to permit us to initiate and implement the customer relationship and meet the related contractual obligations, or that we are statutorily obliged to collect. If the customer does not provide required personal data, OZL AG cannot enter any customer relationship or must, at best, terminate an existing customer relationship. We are accordingly bound by specific statutory provisions to obtain certain personal data, information and documents from you before initiating the customer relationship and in the course of the same.

E. Automated decision-making (including profiling):

- 1.1 We do not in principle use any fully automated decision-making process pursuant to Article 22 GDPR for the initiation and implementation of the customer relationship. Should we implement this procedure where necessary in individual cases, we shall inform you of this separately, should there be a statutory obligation to do so.

F. Data security:

- 1.1 We have appropriate technical and organisational measures to protect your personal data from being unlawfully or inadvertently read, processed, used, forged, lost or destroyed.
- 1.2 Despite all our efforts, however, we cannot rule out the possibility that the information that you have sent to us by digital means might be read or used by others. Please note that unencrypted emails that you send online are not adequately protected against unlawful third party access. We would therefore recommend that you send confidential information to us by post.

G. Changes to our privacy policy:

- 1.1 In case of a change to our legal status and/or to a service, product or user service, we shall where necessary adapt the privacy policy accordingly. Should the change also affect the consent given by you, changes shall only be made once you have given your prior approval.