

PRIVACY POLICY

22.03.2022 Version

The protection of personal data has the highest priority at OZL AG. The collection of personal data takes place at OZL AG in accordance with the legal provisions of the European Data Protection Regulation (DSGVO) and the national laws in the current version. Compliance with the legal provisions on data protection and data security is a matter of course for us. The present data protection declaration is intended to provide you with an overview of the processing of your personal data by OZL AG and to outline your rights. Since the type of data processing depends on the agreed services, not all notices and information must necessarily apply to you in full.

In the following, OZL AG informs you in accordance with DSGVO and the national laws in the current version. Contractual and business partners are requested, insofar as they are legal entities, to bring this data protection declaration to the attention of the persons concerned (e.g. bodies and employees of companies).

A. Data controller and point of contact:

OZL Offenes Zolllager in Liechtenstein AG
Philip Plath
Schliessa 16
9495 Triesen
Liechtenstein
Email: info@ozl.li
Telephone: [+423] 392 61 01

B. Processing of personal data: (for internal information: the term processing according to Art. 4 No. 2 DSGVO includes any form of processing; therefore, only this term shall be used. Please correct independently in the following text of the DSE).

1. What categories of personal data are collected?

The following categories of personal data are processed by us about you:

- a. Name, contact details, home and/or business address, email address, telephone number, fax number, legitimization data (e.g. ID data), nationality, authentication data (e.g. specimen signature);
- b. Identity and biographical information including nationality, date of birth, tax return data, passport data, residence, marital status, current and former employment and other relevant information for the performance of our service and contract activities;
- c. information concerning the financial situation, such as income, expenses, assets and debts, information concerning the origin of the assets, the bank account and other information necessary for the processing of the payment and the fight against fraud and money laundering (e.g. through a World-Check query);

2. how is your personal data collected?

- 2.1. OZL AG processes those personal data that we receive from you or from a third party commissioned by you (e.g. intermediaries, cooperation partners, etc.) in the course of our business relationship. In addition, we process - insofar as necessary for the provision of our service - personal data that we receive from other companies and service providers (order processors pursuant to Art. 28 DSGVO) or from publicly accessible sources (e.g. commercial register, media, Internet, etc.) may also provide personal data that we process.

3. On what basis is the processing of your personal data based and how is this data used?

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3.1. We process your personal data in order to:

- a. to provide you with an offer in connection with our service and contract activities (including the performance of background checks) in accordance with Art. 6 para. 1 let. b and f DSGVO;
- b. to perform our service and contract activities pursuant to Art. 6 (1) (b) GDPR (including related consulting activities) and to comply with industry standards;
- c. to serve and manage the customer relationship pursuant to Art. 6 para. 1 let. b DSGVO (including invoicing) and for documentation reasons;
- d. for the exercise and defense of our lawful rights under Article 6(1)(f) of the GDPR;
- e. to comply with legal and regulatory obligations pursuant to Art. 6 (1)(c) DPA, such as any due diligence obligations under the DDA or DDA and other anti-money laundering and anti-terrorist financing laws, data protection laws, tax reporting obligations and / or to support investigations by the police and / or any other competent authority (where such investigation is justified by relevant laws) and to comply with court orders and requests;
- f. to ensure the security of our system and communications;
- g. for general security reasons and to ensure the safety of our employees and visitors;
- h. for any other reason for which you provide us with personal data.

3.2. We process your personal data for the above reasons if one (or more) of the following reasons apply:

- a. (a) the processing is necessary for the performance of the contractual relationship with the customers;0
- b. (b) the processing is necessary for us to comply with our legal obligations;
- c. (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. (d) the processing is necessary for our legitimate interests (including business development), unless your legitimate interests override our interests (e.g. by virtue of a fundamental right); and/or
- e. (e) express consent has been given by you for the use of the data.

4. With whom can your personal data be shared?

4.1. Your personal data may be shared with:

- a. Companies that have a cooperative relationship with OZL AG and have concluded an order processing agreement;
- b. third parties who assist us in our service and contract activities, such as lawyers, accounting firms, logistics, telecommunications, IT providers and other consultants, translators, consulting/advisory, sales, marketing, debt collection and / or messengers;
- c. Intermediaries we introduce to you;

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- d. Third-party service providers that have business relationships with us and service providers regarding anti-money laundering services and background checks that perform data processing operations for us, banks and insurance companies;
- e. public bodies, institutions, authorities, courts in connection with the fulfillment of contractual and legal obligations and the exercise of contractual and legal rights.

5. Data transfer abroad or to international organizations:

- 5.1. A transfer of data to countries outside the EEA (third countries) will only take place if this is necessary for the performance of the contract, is required by law (e.g. combating money laundering, terrorism financing and other criminal acts) or if you have given us your consent. However, data will only be transferred to third countries that are covered by an adequacy decision of the Commission regarding the level of data protection, i.e. in compliance with the European level of data protection.

6. How long will your personal data be stored?

- 6.1. Your personal data will be stored for as long as necessary to fulfill our contractual and legal obligations pursuant to Art. 17 (3) DSGVO and to fulfill the purposes defined in this Privacy Policy. The respective retention periods under commercial and tax law, accounting and banking law, for example, must be taken into account.
- 6.2. In some cases, this means that we must store your personal data for the same length of time as your documents or a copy of your documents. Normally, this is a period of no more than 10 years from the end of the relevant facts.
- 6.3. The storage of your data for a longer period than the above-mentioned period may be appropriate, e.g. for the exercise or defense of our legal rights. If there is no legal reason for storage, we will delete or, in some cases, anonymize your personal data.

C. Your rights:

- 1.1. You have the following rights with respect 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 revoke this consent at any time. The revocation can be made informally to the address of OZL AG or by email to info@ozl.li.
- 1.3. When processing your personal data, we try to take into account all interests, but you still have the right to object to the processing. This is especially the case if the processing is not necessary for the fulfillment of the contract with you. If you object to the processing, we ask you to inform us of the reason for your revocation. If your revocation is justified, we will review the situation and either terminate or adapt the data processing or inform you of the lawful grounds on the basis of which we will continue the data processing. The lawfulness of the data processing carried out until receipt of the revocation remains unaffected.

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- 1.4. If you believe that our data processing violates applicable data protection law or infringes your personal right to data protection in any way, you have the right to contact the competent authority. In Liechtenstein, this is:

Data Protection Office
Städtle 38
9490 Vaduz
Liechtenstein

D. Legal or contractual obligation to provide data:

- 1.1. The personal data is required for the conclusion of the contract. For this reason, you must provide the personal data that is required for the establishment and implementation of the customer relationship and the fulfillment of the associated contractual obligations or which we are required to collect by law. If the customer does not provide required personal data, OZL AG cannot enter into a customer relationship or may have to terminate an existing customer relationship. Specific legal regulations may also oblige us to obtain certain personal data, information and documents from you before entering into and in the course of the customer relationship.

E. Automated decision making (including profiling):

- 1.1. For the establishment and implementation of the customer relationship, we generally do not use fully automated decision-making in accordance with Art. 22 DSGVO. If we should use these procedures in individual cases, we will inform you about this separately if a legal obligation should exist.

F. Data security

- 1.1. We have taken appropriate technical and organizational measures to protect your personal data from unlawful or accidental reading, processing, use, falsification, loss or destruction.
- 1.2. Despite all our efforts, however, we cannot rule out the possibility that the information you send us digitally may be read or used by other persons. Please note that unencrypted emails that you send via the Internet are not sufficiently protected against unauthorized access by third parties. We therefore recommend that you send confidential information to us by post.

G. Changes to the privacy policy:

In the event of a change in the legal situation or a service, product or user service, we will adapt the data protection declaration accordingly as required. If the change also affects the consent you have given, changes will only be made with your prior consent.