



## Data Protection Notice for Customers due to the EU-General Data Protection Regulation and Data Protection

With the following data protection information, we would like to give you an overview of the processing of personal data held by our asset management company and the resulting rights in accordance with the provisions of the new EU General Data Protection Regulation, hereinafter "GDPR" and the Data Protection Act, hereinafter "DPA". Which data is processed in detail and how it is used depends largely on the services and products to be provided or agreed in each case. The asset management company is legally obliged to protect your privacy and confidentiality and for this reason takes many technical and organisational data protection precautions for all data processing of personal data.

As part of our business relationship, we are required to process personal data that is necessary for the establishment and implementation of the business relationship and the fulfilment of the associated legal or contractual obligations as well as for the provision of services or the execution of orders. Without this data, we will generally not be able to enter or maintain a business relationship, process an order or offer services and products.

If you have any questions regarding individual data processing or wish to exercise your rights as described in point 5 below, please contact us.

### **Responsible Body:**

Anchorage Asset Management AG  
Austrasse 15  
9495 Triesen, Liechtenstein  
Phone: +423 237 60 50  
E-Mail: [info@anchorage.li](mailto:info@anchorage.li)

### **Contact of the data protection officer:**

Gruenenfelder Consulting AG  
Manuela Gruenenfelder  
Bahnhofstrasse 9  
8194 Hüntwangen  
Phone: +41 43 422 55 66  
E-Mail: [gruenenfelder@gruenenfelder-consulting.ch](mailto:gruenenfelder@gruenenfelder-consulting.ch)

## **1. Which data is processed (data categories) and from which sources does it originate in terms of origin?**

We collect and process personal data that we receive as part of our business relationship with our customers. Personal data may be processed at any stage of the business relationship and may differ depending on the group of people involved.

In principle, we process personal data that you provide to us by means of submitted contracts, forms, your correspondence or other documents. If necessary for the provision of the service, we also process personal data that is generated or transmitted due to the use of products or services or that we have legitimately received from third

parties, e.g. a trust company, from public bodies, e.g. UN and EU sanctions lists. Finally, personal data may be processed from publicly accessible sources, e.g. commercial and association registers, press, internet.

In addition to customer data, we may also process personal data of third parties involved in the business relationship, such as data of other authorised agents, representatives, legal successors, or beneficial owners of a business relationship. We request that you also inform any third parties about this data protection notice.

We understand personal data to include the following data categories in particular:

#### Master data

- Personal details, such as name, date of birth and nationality
- Address and contact details, such as home address, telephone number and e-mail address
- Identification data, such as passport or identity card and authentication data, such as specimen signature
- Data from publicly accessible sources, such as tax number

#### Additional basic data

- Information on services and products used, such as investment experience and investment profile, advisory records, data on transactions carried out
- Information on household composition and relationships, such as information on spouses or life partners and other family details, authorised signatories, legal representatives
- Information on financial characteristics and financial situation, such as portfolio and account number, origin of assets
- Information about the professional and personal background, such as professional activity, hobbies, wishes, preferences
- Technical data and information on electronic communication with the asset management company, such as records of access or changes
- Image and sound files, such as video or telephone recordings

## 2. For what purpose and on what legal basis is your data processed

We process personal data in accordance with the provisions of the GDPR and the FADP for the following purposes respectively based on the following legal bases:

- **For the fulfilment of a contract or for the implementation of pre-contractual measures** in the context of the provision and mediation of asset management, investment advice and other financial services that can be provided by an asset management company. The purposes of data processing depend primarily on the specific service or product, e.g. securities, and may include needs, analyses, advice, asset management and support as well as the execution of transactions.
- **To fulfil legal obligations**, in particular compliance with legal and regulatory requirements, e.g. compliance with the GDPR, the DPA, the Asset Management Act, due diligence and anti-money laundering provisions, market abuse provisions, tax laws and agreements, control and reporting obligations, risk management. If you do not provide us with the necessary data, we will have to fulfil the corresponding regulatory obligations and may be forced to terminate the business relationship.
- **To safeguard the legitimate interests by third parties or ourselves** for specifically defined purposes, in particular to determine product development, marketing and advertising, business auditing and risk management, reporting, statistics and planning, prevention and investigation of criminal offences, video surveillance to safeguard domiciliary rights and to defend against threats.

- **On the basis of your consent**, which you have given us for the provision of asset management services or on the basis of orders, such as the forwarding of data to service providers or contractual partners of the asset management company. You have the right to withdraw your consent at any time. This also applies to the revocation of declarations of consent given to the asset management company before the GDPR came into force, i.e. before 25 May 2018. The withdrawal of consent is only effective for the future and does not affect the lawfulness of the data processed prior to the withdrawal.

We reserve the right to continue processing personal data that was collected for one of the above purposes for other purposes if this is compatible with the original purpose or is authorised or required by law, e.g. reporting obligations.

### 3. Who has access to the personal data and how long is it stored?

Access to your data may be granted to bodies both within and outside the asset management company. Within the asset management company, only departments or employees may process your data if they need it to fulfil our contractual, legal, and supervisory obligations and to protect legitimate interests. In compliance with the relevant legal provisions, other companies, service providers or vicarious agents may also receive personal data for these purposes. Processors may be companies in the categories of asset management services, distribution agreements, IT services, logistics, printing services, advice, and consulting as well as sales and marketing. Furthermore, recipients of your data in this context may be other financial services institutions or comparable organisations to which we transfer personal data to carry out the business relationship, e.g. custodian banks, brokers, stock exchanges, information centres.

If there is a legal or regulatory obligation, public bodies and institutions, e.g. supervisory authorities, tax authorities, etc., may also receive your personal data.

Data is only transferred to countries outside the EU or the EEA, so-called third countries, if,

- this is necessary to carry out pre-contractual measures or to fulfil a contract, to provide services or to process orders, e.g. execution of securities transactions,
- you have given us your consent, e.g. for customer service by another company,
- this is necessary for important reasons of public interest or
- this is required by law, e.g. transaction reporting obligations

However, this concerns only countries for which the EU Commission has decided that they have an adequate level of data protection or we take measures to ensure that all recipients have an adequate level of data protection. To this end, we may conclude standard contractual clauses, which are available on request in such case.

We process and store personal data for the entire duration of the business relationship unless there are shorter mandatory deletion obligations for certain data. It should be noted that our business relationships can last for many years. In addition, the duration of storage is determined by the necessity and purpose of the respective data processing. If the data is no longer required for the fulfilment of contractual or legal obligations or to safeguard our legitimate interests, for example when the purpose has been achieved or if consent has been revoked, it is regularly deleted unless further processing is necessary due to contractual or legal retention periods and documentation obligations or for reasons of preserving evidence for the duration of the applicable statute of limitations. The retention period pursuant to the Asset Management Act is generally five years, and up to seven years at the request of the Liechtenstein Financial Market Authority. The retention period pursuant to the Due Diligence Act is ten years.

#### 4. Is there an automated decision-making, including a so-called profiling?

In principle, our decisions are not based exclusively on the automated processing of personal data. Should we use these procedures in individual cases, we will inform you of this separately in accordance with the statutory provisions. There are business areas in which personal data is processed at least partially automatically. This is done with the aim of evaluating certain personal aspects where we are required to do so by law and regulations, e.g. to prevent money laundering, to analyse requirements for services and products and as part of risk management.

The asset management company reserves the right to automatically analyse and evaluate client data in the future, including data of affected third parties, to identify key personal characteristics of the client or to predict developments and create client profiles. These are used for business reviews, personalised advice and the provision of offers and information that the asset management company may make available to the client.

#### 5. What data protection rights are you entitled to?

Regarding the personal data concerning you, you have the following data protection rights in accordance with the GDPR:

- **Right to information:** You can request information from the asset management company as to whether and to what extent personal data concerning you is being processed, e.g. categories of personal data processed, purpose of processing, etc.
- **Right to rectification, erasure and restriction of processing:** You have the right to request the rectification of inaccurate or incomplete personal data concerning you. In addition, your personal data must be erased if the data is no longer necessary for the purposes for which it was collected or processed, if you have withdrawn your consent or if this data is being processed unlawfully. Furthermore, you have the right to demand the restriction of processing.
- **Right of revocation:** You have the right to revoke your consent to the processing of personal data concerning you for one or more specific purposes at any time if the processing is based on your express consent. This also applies to the revocation of declarations of consent given before the GDPR came into force, i.e. before 25 May 2018. Please note that the revocation is only effective for the future. Processing that took place before the revocation is not affected. The revocation also has no influence on data processing on any other legal basis.
- **Right to data portability:** You have the right to receive the personal data concerning you, which you have provided to the controller, in a structured, commonly used, and readable format and have the right to transmit those data to another controller.
- **Right to object:** You have the right to object informally to data processing in individual cases for reasons arising from your situation, provided that the processing is in the public interest or is carried out to protect the legitimate interests of the asset management company or a third party. In addition, you have the right to object informally to the use of personal data for advertising purposes. If you object to the processing of your personal data for direct marketing purposes, we will no longer process your personal data for this purpose.
- **Right to lodge a complaint:** You have the right to lodge a complaint with the competent Liechtenstein supervisory authority. You can also contact another supervisory authority in an EU or EEA member state, for example at your place of residence or work or at the place of the alleged infringement.

**Contact details of the Liechtenstein Data Protection Authority:**

Datenschutzstelle Liechtenstein

Staedtli 38, P.O.Box

9490 Vaduz, Liechtenstein

Phone: + 423 236 60 90

E-Mail: [info.dss@llv.li](mailto:info.dss@llv.li)

Requests for information or objections should preferably be submitted in writing to the Data Protection Officer. This person is also available to you as a contact for all other data protection matters.

January 2024