

# Data privacy notice for website visitors



# 1. An overview of data protection

#### 1.1. General information

The following information will provide you with an easy to navigate overview of what will happen with your personal data when you visit our website. The term "personal data" comprises all data that can be used to personally identify you. For detailed information about the subject matter of data protection, please consult our Data Protection Declaration, which we have included beneath this copy.

### 1.2. Data recording on our website

# Who is the responsible party for the recording of data on this website (i.e. the "controller")?

The data on this website is processed by the operator of the website, whose contact information is available under section "Information Required by Law" on this website.

# How do we record your data?

We collect your data as a result of your sharing of your data with us. This may, for instance be information you enter into our contact form.

Our IT systems automatically record other data when you visit our website. This data comprises primarily technical information (e.g. web browser, operating system or time the site was accessed). This information is recorded automatically when you access our website.

# What are the purposes we use your data for?

A portion of the information is generated to guarantee the error free provision of the website. Other data may be used to analyse your user patterns.

# What rights do you have as far as your information is concerned?

You have the right to receive information about the source, recipients and purposes of your archived personal data at any time without having to pay a fee for such disclosures. You also have the right to demand that your data are rectified, blocked or eradicated. Please do not hesitate to contact us at any time under the address disclosed in section "Information Required by Law" on this website if you have questions about this or any other data protection related issues. You also have the right to log a complaint with the competent supervising agency.

Moreover, under certain circumstances, you have the right to demand the restriction of the processing of your personal data. For details, please consult the Data Protection Declaration under section "Right to Restriction of Data Processing."

# 1.3. Analysis tools and tools provided by third parties

There is a possibility that your browsing patterns will be statistically analysed when your visit our website. Such analyses are performed primarily with cookies and with what we refer to as analysis programmes. As a rule, the analyses of your browsing patterns are conducted anonymously; i.e. the browsing patterns cannot be traced back to you.

You have the option to object to such analyses or you can prevent their performance by not using certain tools. For detailed information about the tools and about your options to object, please consult our Data Protection Declaration below.



# 2. General information and mandatory information

### 2.1. Data protection

The operators of this website and its pages take the protection of your personal data very seriously. Hence, we handle your personal data as confidential information and in compliance with the statutory data protection regulations and this Data Protection Declaration.

Whenever you use this website, a variety of personal information will be collected. Personal data comprises data that can be used to personally identify you. This Data Protection Declaration explains which data we collect as well as the purposes we use this data for. It also explains how, and for which purpose the information is collected.

We herewith advise you that the transmission of data via the Internet (i.e. through e-mail communications) may be prone to security gaps. It is not possible to completely protect data against third party access.

# 2.2. Information about the responsible party (referred to as the "controller" in the GDPR)

The data processing controller on this website is:

Unifinanz Trust reg. Im Bretscha 2 LI-9494 Schaan Phone: +423 237 47 60

E-mail: <u>info@unifinanz.li</u>

The controller is the natural person or legal entity that single-handedly or jointly with others makes decisions as to the purposes of and resources for the processing of personal data (e.g. names, e-mail addresses, etc.).

# 2.3. Designation of a data protection officer as mandated by law

We have appointed the following data protection officer for our company.

Dr. iur. Marie-Theres Frick Data Protection Officer Im Bretscha 2 LI-9494 Schaan

Phone: +423 237 47 60

E-Mail: marie-theres.frick@unifinanz.li

# 2.4. Revocation of your consent to the processing of data

A wide range of data processing transactions are possible only subject to your express consent. You can also revoke at any time any consent you have already given us. To do so, all you are required to do is sent us an informal notification via e-mail. This shall be without prejudice to the lawfulness of any data collection that occurred prior to your revocation.

# 2.5. Right to object to the collection of data in special cases; right to object to direct advertising (Art. 21 GDPR)

In the event that data are processed on the basis of Art. 6 Sect. 1 lit. e or f GDPR, you have the right to at any time object to the processing of your personal data based on grounds arising from your unique situation. This also applies to any profiling based on these provisions. To determine the legal basis, on which any processing of data is based, please consult this Data Protection Declaration. If you log an objection, we will no longer process your affected personal data, unless we are in a position to present compelling protection worthy grounds for the



processing of your data, that outweigh your interests, rights and freedoms or if the purpose of the processing is the claiming, exercising or defence of legal entitlements (objection pursuant to Art. 21 Sect. 1 GDPR).

If your personal data is being processed in order to engage in direct advertising, you have the right to at any time object to the processing of your affected personal data for the purposes of such advertising. This also applies to profiling to the extent that it is affiliated with such direct advertising. If you object, your personal data will subsequently no longer be used for direct advertising purposes (objection pursuant to Art. 21 Sect. 2 GDPR).

# 2.6. Right to log a complaint with the competent supervisory agency

In the event of violations of the GDPR, data subjects are entitled to log a complaint. The right to log a complaint is in effect regardless of any other administrative or court proceedings available as legal recourses.

The contact details of the data protection office responsible in Liechtenstein are as follows: Datenschutzstelle Liechtenstein, Städtle 38, Postfach, FL-9490 Vaduz, Fürstentum Liechtenstein. Phone + 423 236 60 90, E-Mail: info.dss@llv.li

#### 2.7. Right to data portability

You have the right to demand that we hand over any data we automatically process on the basis of your consent or in order to fulfil a contract be handed over to you or a third party in a commonly used, machine readable format. If you should demand the direct transfer of the data to another controller, this will be done only if it is technically feasible.

# 2.8. SSL and/or TLS encryption

For security reasons and to protect the transmission of confidential content, such as purchase orders or inquiries you submit to us as the website operator, this website uses either an SSL or a TLS encryption programme. You can recognise an encrypted connection by checking whether the address line of the browser switches from "http://" to "https://" and also by the appearance of the lock icon in the browser line.

If the SSL or TLS encryption is activated, data you transmit to us cannot be read by third parties.

# 2.9. Information about, blockage, rectification and eradication of data

Within the scope of the applicable statutory provisions, you have the right to at any time demand information about your archived personal data, their source and recipients as well as the purpose of the processing of your data. You may also have a right to have your data rectified, blocked or eradicated. If you have questions about this subject matter or any other questions about personal data, please do not hesitate to contact us at any time.

#### 2.10. Right to demand processing restrictions

You have the right to demand the imposition of restrictions as far as the processing of your personal data is concerned. To do so, you may contact us at any time at the address provided in section "Information Required by Law." The right to demand restriction of processing applies in the following cases:

- In the event that you should dispute the correctness of your data archived by us, we will usually need some time to verify this claim. During the time that this investigation is ongoing, you have the right to demand that we restrict the processing of your personal data.
- If the processing of your personal data was/is conducted in an unlawful manner, you have the option to demand the restriction of the processing of your data in lieu of demanding the eradication of this data.
- If we do not need your personal data any longer and you need it to exercise, defend or claim legal entitlements, you have the right to demand the restriction of the processing of your personal data instead of its eradication.



• If you have raised an objection pursuant to Art. 21 Sect. 1 GDPR, your rights and our rights will have to be weighed against each other. As long as it has not been determined whose interests prevail, you have the right to demand a restriction of the processing of your personal data.

If you have restricted the processing of your personal data, these data – with the exception of their archiving – may be processed only subject to your consent or to claim, exercise or defend legal entitlements or to protect the rights of other natural persons or legal entities or for important public interest reasons cited by the European Union or a member state of the EU.

# 3. Recording of data on our website

#### 3.1. Cookies

In some instances, our website and its pages use so-called cookies. Cookies do not cause any damage to your computer and do not contain viruses. The purpose of cookies is to make our website more user friendly, effective and more secure. Cookies are small text files that are placed on your computer and stored by your browser.

Most of the cookies we use are so-called "session cookies." They are automatically deleted after your leave our site. Other cookies will remain archived on your device until you delete them. These cookies enable us to recognise your browser the next time you visit our website.

You can adjust the settings of your browser to make sure that you are notified every time cookies are placed and to enable you to accept cookies only in specific cases or to exclude the acceptance of cookies for specific situations or in general and to activate the automatic deletion of cookies when you close your browser. If you deactivate cookies, the functions of this website may be limited.

Cookies that are required for the performance of the electronic communications transaction or to provide certain functions you want to use (e.g. the shopping cart function), are stored on the basis of Art. 6 Sect. 1 lit. f GDPR. The website operator has a legitimate interest in storing cookies to ensure the technically error free and optimised provision of the operator's services. If other cookies (e.g. cookies for the analysis of your browsing patterns) should be stored, they are addressed separately in this Data Protection Declaration.

#### 3.2. Server log files

The provider of this website 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.

This data is recorded on the basis of Art. 6 Sect. 1 lit. f GDPR. The operator of the website 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.



# 4. Analysis tools and advertising

#### 4.1. Matomo

This website uses the open-source web analysis service Matomo. Matomo uses technologies that make it possible to recognize the user across multiple pages with the aim of analyzing the user patterns (e.g. cookies or device fingerprinting). The information recorded by Matomo about the use of this website will be stored on our server. Prior to archiving, the IP address will first be anonymized.

Through Matomo, we are able to collect and analyze data on the use of our website-by-website visitors. This enables us to find out, for instance, when which page views occurred and from which region they came. In addition, we collect various log files (e.g. IP address, referrer, browser, and operating system used) and can measure whether our website visitors perform certain actions (e.g. clicks, purchases, etc.).

The use of this analysis tool is based on Art. 6(1)(f) GDPR. The website operator has a legitimate interest in the analysis of user patterns, in order to optimize the operator's web offerings and advertising. If appropriate consent has been obtained, the processing is carried out exclusively on the basis of Art. 6(1)(a) GDPR. This consent can be revoked at any time.

#### IP anonymization

For analysis with Matomo we use IP anonymization. Your IP address is shortened before the analysis, so that it is no longer clearly assignable to you.

#### Hosting

We host Matomo with the following third-party provider:

li-life web+it est., Austrasse 81, Lova Center, 9490 Vaduz Liechtenstein

#### Data processing

We have concluded a data processing agreement (DPA) with the above-mentioned provider. This is a contract mandated by data privacy laws that guarantees that they process personal data of our website visitors only based on our instructions and in compliance with the GDPR.

#### 5. Newsletter

### 5.1. Newsletter data

If you would like to subscribe to the newsletter offered on this website, we will need from you an e-mail address as well as information that allow us to verify that you are the owner of the e-mail address provided and consent to the receipt of the newsletter. No further data shall be collected or shall be collected only on a voluntary basis. We shall use such data only for the sending of the requested information and shall not share such data with any third parties.

The processing of the information entered into the newsletter subscription form shall occur exclusively on the basis of your consent (Art. 6 Sect. 1 lit. a GDPR). You may revoke the consent you have given to the archiving of data, the e-mail address and the use of this information for the sending of the newsletter at any time, for



instance by clicking on the "Unsubscribe" link in the newsletter. This shall be without prejudice to the lawfulness of any data processing transactions that have taken place to date.

The data you archive with us for the purpose of the newsletter subscription shall be archived by us until you unsubscribe from the newsletter. Once you cancel your subscription to the newsletter, the data shall be deleted. This shall not affect data we have been archiving for other purposes.

### 5.2. MailChimp

This website uses the services of MailChimp to send out its newsletters. The provider is the Rocket Science Group LLC, 675 Ponce De Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA.

Among other things, MailChimp is a service that can be deployed to organise and analyse the sending of newsletters. Whenever you enter data for the purpose of subscribing to a newsletter (e.g. your e-mail address), the information is stored on MailChimp servers in the United States.

MailChimp is in possession of a certification that is in compliance with the "EU-US-Privacy-Shield." The "Privacy-Shield" is a compact between the European Union (EU) and the United States of America (USA) that aims to warrant the compliance with European data protection standards in the United States.

With the assistance of the MailChimp tool, we can analyse the performance of our newsletter campaigns. If you open an e-mail that has been sent through the MailChimp tool, a file that has been integrated into the e-mail (a so-called web-beacon) connects to MailChimp's servers in the United States. As a result, it can be determined whether a newsletter message has been opened and which links the recipient possibly clicked on. Technical information is also recorded at that time (e.g. the time of access, the IP address, type of browser and operating system). This information cannot be allocated to the respective newsletter recipient. Their sole purpose is the performance of statistical analyses of newsletter campaigns. The results of such analyses can be used to tailor future newsletters to the interests of their recipients more effectively.

If you do not want to permit an analysis by MailChimp, you must unsubscribe from the newsletter. We provide a link for you to do this in every newsletter message. Moreover, you can also unsubscribe from the newsletter right on the website.

The data is processed based on your consent (Art. 6 Sect. 1 lit. a GDPR). You may revoke any consent you have given at any time by unsubscribing from the newsletter. This shall be without prejudice to the lawfulness of any data processing transactions that have taken place prior to your revocation.

The data you archive with us for the purpose of the newsletter subscription shall be archived by us until you unsubscribe from the newsletter. Once you cancel your subscription to the newsletter, the data shall be deleted from our servers as well as those of MailChimp. This shall not affect data we have been archiving for other purposes.

For more details, please consult the Data Privacy Policies of MailChimp at: <a href="https://mailchimp.com/legal/terms/">https://mailchimp.com/legal/terms/</a>.

# 5.3. Execution of a contract data processing agreement

We have executed a so-called "Data Processing Agreement" with MailChimp, in which we mandate that MailChimp undertakes to protect the data of our customers and to refrain from sharing it with third parties.

# 6. Plug-ins and Tools

# 6.1. YouTube with expanded data protection integration

Our website uses plug-ins of the YouTube platform, which is being operated by Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.



We use YouTube in the expanded data protection mode. According to YouTube, this mode ensures that YouTube does not store any information about visitors to this website before they watch the video. Nevertheless, this does not necessarily mean that the sharing of data with YouTube partners can be ruled out as a result of the expanded data protection mode. For instance, regardless of whether you are watching a video, YouTube will always establish a connection with the Google DoubleClick network.

As soon as you start to play a YouTube video on our website, a connection to YouTube's servers will be established. As a result, the YouTube server will be notified, which of our pages you have visited. If you are logged into your YouTube account while you visit our site, you enable YouTube to directly allocate your browsing patterns to your personal profile. You have the option to prevent this by logging out of your YouTube account.

Furthermore, after you have started to play a video, YouTube will be able to place various cookies on your device. With the assistance of these cookies, YouTube will be able to obtain information about our website visitor. Among other things, this information will be used to generate video statistics with the aim of improving the user friendliness of the site and to prevent attempts to commit fraud. These cookies will stay on your device until you delete them.

Under certain circumstances, additional data processing transactions may be triggered after you have started to play a YouTube video, which are beyond our control.

The use of YouTube is based on our interest in presenting our online content in an appealing manner. Pursuant to Art. 6 Sect. 1 lit. f GDPR, this is a legitimate interest.

For more information on how YouTube handles user data, please consult the YouTube Data Privacy Policy under: https://policies.google.com/privacy?hl=en.