



ADVOKATUR
SPRENGER+PARTNER

DATA PROTECTION DECLARATION **FOR VISITORS OF OUR WEBSITE**

Please note that this is a translation of our German Data Protection Declaration. In case of deviations, the German version shall prevail.

With this Data Protection Declaration, we would like to provide you with an overview of the manner in which we process your data and your rights in this connection according to the provisions of the European General Data Protection Regulation (hereinafter called "GDPR") and the Liechtenstein Data Protection Act (Datenschutzgesetz, hereinafter called "DSG"):

I. NAME AND ADDRESS OF THE DATA CONTROLLER AND THE DATA PROTECTION OFFICER

Data Controller within the meaning of the GDPR is:

Advokatur Sprenger + Partner AG

Landstrasse 158

9494 Schaan

Liechtenstein

T +423 230 20 93

office@asp.li

www.asp.li

II. GENERAL INFORMATION CONCERNING DATA PROCESSING

1. Extent of the processing of personal data

Processing personal data is limited to the data necessary in order to provide a well-functioning web page as well as to provide our services. Processing personal data of our users only take place for the agreed purposes or on a legal basis within the meaning of the GDPR. We only collect the personal data absolutely necessary to implement and process our duties and to provide the agreed services or data you have voluntarily disclosed.

2. Your data protection rights

You have the right to demand information on your personal data processed by us. In particular, you are entitled to demand disclosure regarding the purpose for which your data is collected, the categories of personal data collected, the categories of third party recipients, who have received or will receive your personal data as well as the storage period. Additionally, you have the right to rectification, deletion, restriction of the processing, objection, data portability, as well as to receive information on its origin, if not collected by us, and to be informed on automatic decision making including profiling.

You have the right to withdraw any given consent to use your personal data at any time.

If you are of the opinion that our processing of your personal data is in breach of applicable data protection law or that your statutory data protection rights have been infringed otherwise, you may file a complaint with the competent supervisory authority. In Liechtenstein, the Data Protection Office (www.datenschutzstelle.li) is the competent authority.

III. DESCRIPTION AND EXTENT OF DATA PROCESSING

1. Information on the provision of the website

Server log files

Each time our website is accessed, our system automatically records data and information about the computer system of the accessing computer.

The following data is collected:

- information about the browser type and the version used
- operating system of the user
- internet service provider of the user
- date and time of server inquiry
- IP address of the user
- Referrer URL (originating website)
- City and country from which the user accesses the website
- Number of visits as well as the duration of access

Processing this information is neither a statutory, nor a contractual obligation. We retain this information due to our legitimate interest as per Art. 6 para.1 lit. f GDPR.

Processing is performed for the following reasons:

- to ensure a problem-free connection to our website
- to ensure a reliable use of our website
- to ensure system security
- to ensure system stability
- further administrative purposes

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 you 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.

Google Analytics

This website uses functions of the web analysis service Google Analytics. The provider of this service is Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

Google Analytics uses so-called cookies. Cookies are text files, which are stored on your computer and enable an analysis of the use of the website by users. The information generated by cookies on your use of this website are usually transferred to a Google server in the United States, where it is stored.

The storage of Google Analytics cookies and the utilization of this analysis tool are based on Art. 6 Sect. 1 lit. f GDPR. The operator of this website has a legitimate interest in the analysis of user patterns to optimize both, the services offered online and the operator's advertising activities. On this website, we have activated the IP anonymization function. As a result, your IP address will be abbreviated by Google within the member states of the European Union or in other states that have ratified the Convention on the European Economic Area prior to its transmission to the United States. The full IP address will be transmitted to one of Google's servers in the United States and abbreviated there only in exceptional cases. On behalf of the operator of this website, Google shall use this information to analyse your use of this website to generate reports on website activities and to render other services to the operator of this website that are related to the use of the website and the Internet. The IP address transmitted in conjunction with Google Analytics from your browser shall not be merged with other data in Google's possession. You do have the option to prevent the archiving of cookies by making pertinent changes to the settings of your browser software. However, we have to point out that in this case you may not be able to use all of the functions of this website to their fullest extent. Moreover, you have the option prevent the recording of the data generated by the cookie and affiliated with your use of the website (including your IP address) by Google as well as the processing of this data by Google by downloading and installing the browser plug-in available under the following link:

<https://tools.google.com/dlpage/gaoptout?hl=en>.

You have the option to prevent the recording of your data by Google Analytics by clicking on the following link. This will result in the placement of an opt out cookie, which prevents the recording of your data during future visits to this website.

For more information about the handling of user data by Google Analytics, please consult Google's Data Privacy Declaration at: <https://support.google.com/analytics/answer/6004245?hl=en>.

We have executed a contract data processing agreement with Google and are implementing the stringent provisions of the German data protection agencies to the fullest when using Google Analytics.

Data on the user or incident level stored by Google linked to cookies, user IDs or advertising IDs (e.g. DoubleClick cookies, Android advertising ID) will be anonymized or deleted after 26 months. For details please click the following link:
<https://support.google.com/analytics/answer/7667196?hl=en>

Contact form

If you submit inquiries to us via our contact form, the information provided in the contact form as well as any contact information provided therein will be stored by us in order to handle your inquiry and in the event that we have further questions. We will not share this information without your consent. Hence, the processing of the data entered into the contact form occurs exclusively based on your consent (Art. 6 Sect. 1 lit. a GDPR). You have the right to revoke at any time any consent you have already given us. To do so, all you are required to do is send 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. The information you have entered into the contact form shall remain with us until you ask us to eradicate the data, revoke your consent to the archiving of data or if the purpose for which the information is being archived no longer exists (e.g. after we have concluded our response to your inquiry). This shall be without prejudice to any mandatory legal provisions – in particular retention periods.

Newsletter

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.

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.

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:
<https://mailchimp.com/legal/terms/>.

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.

Facebook-Plugins (Like & Share-Button)

We have integrated plug-ins of the social network Facebook, provided by Facebook Inc., 1 Hacker Way, Menlo Park, California 94025, USA, on our website. You will be able to recognise Facebook plug-ins by the Facebook logo or the "Like" button on our website. An overview of the Facebook plug-ins is available under the following link: <https://developers.facebook.com/docs/plugins/>.

Whenever you visit our website and its pages, the plug-in will establish a direct connection between your browser and the Facebook server. As a result, Facebook will receive the information that you have visited our website with your plug-in. However, if you click the Facebook "Like" button while you are logged into your Facebook account, you can link the content of our website and its pages with your Facebook profile. As a result, Facebook will be able to allocate the visit to our website and its pages to your Facebook user account. We have to point out, that we as the provider of the website do not have any knowledge of the transferred data and its use by Facebook. For more detailed information, please consult the Data Privacy Declaration of Facebook at: <https://www.facebook.com/privacy/explanation>.

If you do not want Facebook to be able to allocate your visit to our website and its pages to your Facebook user account, please log out of your Facebook account while you are on our website.

The use of the Facebook plug-in is based on Art. 6 Sect. 1 lit. f GDPR. The operator of the website has a legitimate interest in being as visible as possible on social media.

Twitter Plugin

We have integrated functions of the social media platform Twitter into our website. These functions are provided by Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA. While you use Twitter and the "Re-Tweet" function, websites you visit are linked to your Twitter account and disclosed to other users. During this process, data are transferred to Twitter as well. We must point out, that we, the providers of the website and its pages do not know anything about the content of the data transferred and the use of this information by Twitter. For more details, please consult Twitter's Data Privacy Declaration at: <https://twitter.com/en/privacy>.

The use of Twitter plug-ins is based on Art. 6 Sect. 1 lit. f GDPR. The operator of the website has a legitimate interest in being as visible as possible on social media.

You have the option to reset your data protection settings on Twitter under the account settings at <https://twitter.com/account/settings>.

Google+ Plugin

Our website and its pages use functions of Google+; the provider is Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

Recording and sharing of information: With the assistance of the Google+ button, you can publish information worldwide. The Google+ button provides you and other users with custom tailored Google content as well as content of our partners. Google saves the information you have entered

for content with +1 as well as information about the website/page you viewed when you clicked on +1. Your +1 entries may appear as information along with your profile name and your photo on Google services, such as in search results or in your Google profile or in other locations on websites and ads on the Internet.

Google records information about your +1 activities to improve Google's services for you and others. To be able to use the Google+ button, you will need a public Google profile, which is visible around the world, which must contain at least the name you have chosen for your profile. This name is used in conjunction with all Google services. In some cases, this name may also replace another name you have used when sharing content via your Google account. The identity of your Google profile may be displayed to users who know your e-mail address or are in possession of other information related to you that identifies you.

Use of the recorded information: Besides the abovementioned purposes of use, the information you provide is also used in compliance with the applicable Google Data Privacy Policies. Google may potentially publish summary statistics about the +1 activities of its users or shares this information with users and partners, such as publishers, prospective customers or affiliated websites.

The use of the Google+ plug-in is based on Art. 6 Sect. 1 lit. f GDPR. The operator of the website has a legitimate interest in being as visible as possible on social media.

LinkedIn Plugin

Our website uses functions of the LinkedIn network. The provider is LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA.

Any time you access one of our sites that contains functions of LinkedIn, a connection to LinkedIn's servers is established. LinkedIn is notified that you have visited our websites with your IP address. If you click on LinkedIn's "Recommend" button and are logged into your LinkedIn account at the time, LinkedIn will be in a position to allocate your visit to our website to your user account. We have to point out that we as the provider of the websites do not have any knowledge of the content of the transferred data and its use by LinkedIn.

The use of the LinkedIn plug-in is based on Art. 6 Sect. 1 lit. f GDPR. The operator of the website has a legitimate interest in being as visible as possible on social media.

For further information on this subject, please consult LinkedIn's Data Privacy Declaration at <https://www.linkedin.com/legal/privacy-policy>.

Google Maps

Via an API, this website uses 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. We use Google Maps to present our online content in an appealing manner and to make the locations disclosed on our website easy to find. This constitutes a legitimate interest as defined in Art. 6 Sect. 1 lit. f GDPR. For more information on the handling of user data, please review Google's Data Privacy Declaration under <https://policies.google.com/privacy?hl=en>.

IV. DATA SECURITY

This website uses either an SSL or a TLS encryption program. You can recognize an encrypted connection by checking whether the address line of the browser switches to https:// and also by the appearance of the lock icon in the browser line.

Additionally, we use further technical and organizational security measures, in order to protect your data against accidental or intentional manipulation, partly or total loss, destruction or access by unauthorized third parties. Our safety measures are constantly improved according to technological developments.

V. VALID VERSION

This is the currently valid Data Protection Declaration as of July 2020.

Due to the continued development of our website and associated services or organizational modifications within our law firm or on the grounds of amended legal or regulatory requirements, it may become necessary to amend this Data Protection Declaration. You can access and print out the respective current Data Protection Declaration on our website at any time.