

Information in accordance with data protection requirements under the DSGVO (GDPR) and DSG / Data protection Info-sheet

Information in accordance with the basic data protection regulation pursuant to Articles 13, 14 and 21 of the basic data protection regulation (DSGVO) and DSG

Dear customer,

Dear interested party or job applicant,

Dear other contractual partners

We (as the responsible party), are pleased to inform you (as the natural person concerned) as resident in a member state of the European Union (EU) or the EEA, via this Data Protection Info-Sheet in connection with the **collection of personal data from the data subject** (Art. 13 and 14 DSGVO or Art. 30, 32 f. DSG) and of your **right of objection** (Art. 21 DSGVO).

Furthermore, this Info-Sheet for natural persons contains other important information concerning the processing of personal data.

Information on transparency and traceability in data processing can be found on our website www.unionbankag.com under the heading "Data protection".

The present data protection information forms part of our data protection declaration.

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A. Important notes

1. Contact person for data processing at Union Bank AG in Liquidation

You can contact our Data Protection Officer (DPO) for Union Bank AG in Liquidation at

Union Bank AG in Liquidation, Austrasse 46, FL-9490 Vaduz (hereinafter referred to as UBAG i.L.)

Data protection officer

Tel. no.: +423 239 35 35 on bank working days during business hours (08:00 to 17:00)

E-mail: datenschutz@unionbankag.com (keyword: "data protection")

2. Sources and data used

We process personal data that we receive from you in the course of our business relationship. In addition, we process - insofar as necessary for the provision of our services - personal data which we have obtained and are permitted to process from publicly accessible sources (e.g. debtor registers, land registers, commercial and association registers, press, Internet) or which have been legitimately transmitted to us by other third parties.

Relevant personal data are personal details (name, address and other contact details, date and place of birth and nationality), legitimation data (e.g. identity card data) and authentication data (e.g. specimen signature). In addition, this can also be order data, data from the fulfillment of our contractual obligations, information about your financial situation (for example, creditworthiness data), documentation data (for example, minutes of meetings), register data, data about your use of the media we offer (for example, time of access to our websites, apps or newsletters, pages clicked on by us or entries) and other data comparable to the categories mentioned.

3. Purpose of data processing at UBAG i.L. and legal basis

We process personal data on the basis of consents given and in accordance with the applicable legal regulations. In the area of data protection law, these are in particular the Liechtenstein Data Protection Act (Datenschutzgesetz Liechtenstein (DSG)) and the European Data Protection Basic Regulation (DSGVO).

3.1 To fulfil contractual obligations (Art. 6 para. 1 letter b DSGVO and Art. 2 DSG)

The processing of personal data is carried out for the operation of the individual contractual services to be provided by UBAG i.L. (business purpose), - in particular for the fulfilment of our contracts or planned conclusion of contracts (pre-contractual measures) with you and for the execution of your orders - as well as for all activities required for business operations and administration.

The purposes of the data processing depends on the specific service requested by the data subject vis-à-vis UBAG i.L..

3.2 Within the framework of the balancing of interests (Art. 6 para. 1 letter f DSGVO or Art. 23 DSG)

We process your data beyond the actual fulfilment of the contract to protect legitimate interests of us or third parties, unless your interest in the protection of your personal data outweighs this.

Examples:

- Assertion of legal claims and defence in legal disputes;
- Ensuring IT security and IT operation of the responsible company;
- Measures for building and plant security (e.g. access controls);
- Measures to secure the right to enforce company rules ;
- Video surveillance, which serves to collect evidence in the event of criminal offences and thus to protect customers and employees as well as the exercise of domestic authority;
- Measures for business management and further development of services (including, where appropriate, review and optimisation of procedures for requirements analysis and direct customer contact);
- Advertising, unless you have objected to the use of your data;

3.3 Due to legal requirements (Art. 6 para. 1 letter c DSGVO)

If UBAG i.L. is subject to a legal obligation which makes the processing of personal data necessary, for example to comply with tax obligations, the processing is based on Art. 6 (1) (c) DSGVO for (natural) persons resident in the EU/EEA.

3.4 Based on your consent (Art. 6 para. 1 letter a DSGVO)

Art. 6 para. 1 letter a DSGVO provides UBAG i.L. with the legal basis for processing operations in which we obtain consent from the data subject (customer or interested party residing in the EU or EEA or Switzerland) for a specific processing purpose.

If you have given or give us your consent to process personal data for specific purposes such as the evaluation of customer data or data of interested parties for marketing purposes, the legality of the processing is based on your consent. You may revoke any consent you have given at any time. This also applies to the revocation of declarations of consent that were issued to us prior to the validity of the DSGVO, i.e. prior to 25 May 2018 or prior to the validity of the DSG, i.e. prior to 1 January 2019.

Please note that the revocation is only effective for the future. Processing that took place before the revocation is not affected.

4. Information on the data recipients

Within UBAG i.L., access to your data is granted to those entities that need it to fulfil our contractual and legal obligations or that have a legitimate interest, provided your interests do not outweigh the data transfer and provided that there is a separate legal basis for the data transfer on the part of the sender. Order processors employed by us (Art. 28 DSGVO) may also receive data for these purposes. These are companies especially in the categories of IT services, logistics, printing services, telecommunications, consulting and advisory services as well as sales and marketing. For processing, however, we use electronic portals of third-party providers, i.e. software developed by third parties.

With regard to other data transfer to recipients outside UBAG i.L., it should first be noted that we are obliged to maintain secrecy about all customer-related facts and assessments of which we become aware (business secrecy and banking secrecy). We may only pass on information about you if required by law, or if there is sufficient basis for doing so, if you have given your consent, or if we are otherwise authorised to provide information. Under these conditions, recipients of personal data may be, for example: public authorities.

Other data recipients may be those entities for which you have given us your consent to transfer data.

5. Duration (periods) of data storage

We process and store your personal data within the scope of what is necessary for the duration of our business relationship, which also includes, for example, the initiation and execution of a contract.

Furthermore, we are subject to various storage and documentation obligations. As a matter of principle, UBAG i.L. is subject to the applicable statutory retention periods (principle: retention period of ten years) or the shorter retention periods internally determined by UBAG i.L., which do not fall directly under the statutory periods.

6. Routine deletion and blocking of personal data

The controller shall process and store personal data relating to the data subject only for the period of time necessary to achieve the purpose of storage or where provided for by the European legislator or other legislator in laws or regulations to which the controller is subject.

If the purpose of storage ceases to apply or if a retention or storage period (electronic data) prescribed by the European Directives and Regulations or any other competent legislator expires, the personal data will be blocked or deleted as a matter of routine and in accordance with the statutory provisions.

7. Information on the transfer of data to a third country

A data transfer to third countries (countries outside the European Economic Area - EEA; e.g. to Switzerland) takes place in accordance with Art. 44 ff. DSGVO for the execution of your orders with UBAG i.L. or one of

your contractual partners (order processor) to Switzerland, provided that the data transfer is necessary or legally required or you have given us your consent.

8. Data protection rights of the data subject under the DSGVO

8.1 Overview

Every person concerned with a legal connection to the DSGVO or the DSG has

- the **right to confirmation and/or information** according to Art. 15 DSGVO/Art. 34 DSG;
- the **right of rectification** under Art. 16 DSGVO;
- the **right to deletion** ("right to be forgotten") under Art. 17 DSGVO/Art. 35 DSG;
- the **right to restrict processing** under Art. 18 DSGVO and
- the **right to data transferability** in accordance with Art. 20 DSGVO (technical transfer of the data of the data subject directly from one responsible party to another responsible party)

Note for customers or interested parties resident in Germany

With regard to the **right of information** and the **right of deletion, restrictions** apply in particular to customers or interested parties resident in Germany in accordance with § 34 BDSG, according to which the person responsible may refuse to provide information to the person concerned about the origin and recipients, if the interest in maintaining business secrecy outweighs the interest in information of the person concerned.

A further restriction for customers or interested parties residing in Germany exists in accordance with § 35 BDSG, according to which a blockage takes the place of a deletion, insofar as legal, statutory or contractual retention periods conflict with a deletion or there is reason to assume that the interests of the affected party worthy of protection would be impaired by a deletion.

Right of appeal to the Liechtenstein data protection authority as supervisory authority (Art. 77 DSGVO)

The data subject shall have the right to appeal to a supervisory authority, notwithstanding any other administrative or judicial remedies available. The competent supervisory authority at the seat of the person responsible (respondent) is

Data Protection Agency Principality of Liechtenstein, Städtle 38, P.O. Box 684, FL-9490 Vaduz.

The following link will take you directly to the **complaint form**.

As a complainant, please complete this form in full in accordance with the information required for this purpose and send it to the named data protection authority (recipient).

Link complaint form: <https://www.datenschutzstelle.li/services-und-downloads/formulare>

8.2 The rights in detail

(a) Right to confirmation

Every data subject has the right, granted by the European Directive and Regulation, to obtain from the controller confirmation as to whether personal data relating to him or her are being processed. If a data subject wishes to exercise this right of confirmation, he or she may at any time contact an employee of the controller.

(b) Right to information

Any person affected by the processing of personal data has the right, granted by the European Directives and Regulations, to obtain at any time and free of charge from the data controller information on personal data relating to him/her and a copy thereof. The European Data Protection Supervisor has also granted the data subject access to the following information:

- the processing purposes
- the categories of personal data processed
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular to recipients in third countries or international organisations
- if possible, the planned duration for which the personal data will be stored or, if this is not possible, the criteria for determining this duration
- the existence of a right of rectification or erasure of personal data relating to him or her or of a restriction on processing by the controller or a right to object to such processing
- the existence of a right of appeal to a supervisory authority
- if the personal data are not collected from the data subject: all available information on the origin of the data
- the existence of an automated decision-making process including profiling in accordance with Article 22 Paragraphs 1 and 4 DPA and - at least in these cases - meaningful information on the logic involved and the scope and intended consequences of such processing for the data subject

The data subject shall also have the right to obtain information as to whether personal data have been transferred to a third country or to an international organisation. If this is the case, the data subject shall also have the right to obtain information on the appropriate safeguards relating to the transfer.

If a data subject wishes to exercise this right of access, he or she may at any time contact an employee of the controller.

(c) Right of rectification

Any person concerned by the processing of personal data shall have the right to obtain the rectification without delay of inaccurate personal data relating to him. The data subject shall also have the right to obtain

the completion of incomplete personal data, including by means of a supplementary declaration, having regard to the purposes of the processing.

If a data subject wishes to exercise this right of rectification, he or she may contact the person responsible at any time.

(d) Right of cancellation (right to be forgotten)

Any person concerned by the processing of personal data shall have the right to obtain from the controller the deletion without delay of personal data relating to him/her, where one of the following reasons applies and insofar as the processing is not necessary

- The personal data has been collected or otherwise processed for purposes for which it is no longer necessary.
- The data subject withdraws his or her consent on which the processing was based in accordance with Article 6 paragraph 1 letter a DSGVO or Article 9 paragraph 2 letter a DSGVO, and there is no other legal basis for the processing.
- The data subject lodges an objection to the processing in accordance with Art. 21 para. 1 DSGVO and there are no overriding legitimate reasons for the processing, or the data subject lodges an objection to the processing in accordance with Art. 21 para. 2 DSGVO.
- The personal data were processed unlawfully.
- The deletion of personal data is necessary to comply with a legal obligation under EU law or the law of the Member States to which the controller is subject.
- The personal data was collected in relation to information society services offered in accordance with Art. 8 para. 1 DSGVO.

If any of the above reasons apply and a data subject wishes to request the deletion of personal data held by UBAG i.L., he or she may contact the data controller at any time.

UBAG i.L. will ensure that the request for deletion is complied with immediately to the extent permitted by law.

If the personal data have been made public by UBAG i.L. and if the company, as the data controller, is obliged to delete the personal data in accordance with Art. 17 para. 1 of the DSGVO, UBAG i.L. shall take reasonable measures, including technical measures, taking into account the available technology and the implementation costs, to inform other data controllers who process the published personal data that the data subject has requested these other data controllers to delete all links to these personal data or copies or replications of these personal data, unless the processing is necessary. UBAG i.L. will take the necessary steps in individual cases.

e) Right to restrict processing

Any person affected by the processing of personal data has the right, granted by the European Directives and Regulations, to request the controller to restrict the processing if one of the following conditions is met:

- The accuracy of the personal data is contested by the data subject, for a period of time that allows the controller to verify the accuracy of the personal data.
- The processing is unlawful, the data subject refuses to have the personal data deleted and instead requests that the use of the personal data be restricted.
- The controller no longer needs the personal data for the purposes of the processing, but the data subject needs them for the purpose of asserting, exercising or defending legal claims.
- The data subject has lodged an objection to the processing pursuant to Art. 21 para. 1 DSGVO and it is not yet clear whether the legitimate reasons of the controller outweigh those of the data subject.

If one of the above conditions is met and a person concerned wishes to request the restriction of personal data stored by Notterkran Group, he or she can contact the person responsible at any time. Notterkran Group will arrange for the restriction of processing.

(f) Right to data portability

Any person affected by the processing of personal data has the right, granted by the European Directive and Regulation Giver, to receive the personal data concerning him/her, which have been provided by the data subject to a controller, in a structured, common and machine-readable format. He or she also has the right to have this data communicated to another controller without hindrance by the controller to whom the personal data has been made available, provided that the processing is based on the consent pursuant to Art. 6 para. 1 letter a DSGVO or Art. 9 para. 2 letter a DSGVO or on a contract pursuant to Art. 6 para. 1 letter b DSGVO and that the processing is carried out by means of automated procedures, unless the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Furthermore, when exercising their right to data transfer pursuant to Art. 20 para. 1 DSGVO, the data subject has the right to obtain that personal data be transferred directly from one controller to another controller, insofar as this is technically feasible and provided that this does not adversely affect the rights and freedoms of other persons.

(g) Right of appeal

Every person concerned by the processing of personal data has the right to object at any time, for reasons arising from his or her particular situation, to the processing of personal data concerning him or her carried out pursuant to Article 6(1)(e) or (f) of the DSGVO.

In the event of an objection, UBAG i.L. shall no longer process the personal data unless it can demonstrate compelling legitimate reasons for processing that outweigh the interests, rights and freedoms of the data subject, or the processing serves to assert, exercise or defend legal claims.

Where UBAG i.L. processes personal data for the purpose of direct marketing, the data subject shall have the right to object at any time to the processing of personal data for the purpose of such marketing. If the data subject objects to UBAG i.L. processing for the purposes of direct marketing, UBAG i.L. shall no longer process the personal data for those purposes.

In addition, the data subject has the right to object, on grounds relating to his or her particular situation, to the processing of personal data concerning him or her carried out at UBAG i.L. for the purposes of scientific or historical research or for statistical purposes in accordance with Article 89 (1) of the DSGVO, unless such processing is necessary for the performance of a task carried out in the public interest.

To exercise the right of appeal, the data subject may contact UBAG i.L. directly. The data subject is also free to exercise his or her right of objection in connection with the use of information society services, notwithstanding Directive 2002/58/EC, by means of automated procedures involving technical specifications.

h) Right to revoke a data protection consent

Any person concerned by the processing of personal data has the right to withdraw his or her consent to the processing of personal data at any time.

If the data subject wishes to exercise his/her right to withdraw his/her consent, he/she may use the form "Revocation data subject", available on our website www.unionbankag.com under the heading "Data Protection", and fill in the information requested therein for the purpose of identification and verification of his/her legitimacy. The completed form can then be sent directly to the person in charge for further processing.

9. Obligation to provide data by the data subject?

Within the scope of our business relationship, you only need to provide us with the personal data that is necessary for the establishment, execution and termination of a business relationship or that we are legally or regulatively obliged to collect. Without this data, we will generally have to refuse to conclude the contract or execute the order or will no longer be able to execute an existing contract and may have to terminate it.

10. Automated decision making and profiling

As a responsible company, we refrain from automatic decision making or profiling (for terms, see under "Privacy Policy"; link "Definitions").

B. Information about your right of objection under Art. 21 DSGVO

1. you have the right to **object** at any time, for reasons arising from your particular situation, to the processing of personal data relating to you which is carried out on the basis of Article 6 paragraph 1 letter e) DPA (data processing in the public interest) or Article 6 paragraph 1 letter f) DSGVO (data processing based on a balancing of interests)

If you object, we will no longer process your personal data, unless we can prove compelling reasons for processing that are worthy of protection and outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

2. In individual cases, we process your personal data in order to carry out direct advertising. You have the right to object at any time to the processing of personal data concerning you for the purpose of such direct marketing, including profiling, insofar as it is related to such direct marketing.

If you object to processing for direct marketing purposes, we will no longer process your personal data for these purposes.

The objection may be made without any formality and should be addressed, if possible, to

- Data Protection Officer (DPO)

Union Bank AG in Liquidation, Austrasse 46, FL-9490 Vaduz

e-mail: datenschutz@unionbankag.com

Tel. no.: +423 239 35 35 during business hours from 08:00 to 17:00 (bank working days in Liechtenstein are decisive)