

Privacy policy

Preliminary remarks

Thank you for your interest in Union Bank AG in Liquidation (hereinafter referred to as UBAG i.L.), domiciled in Vaduz, Liechtenstein, and the services we offer. UBAG i.L. takes the protection of your personal data very seriously. Data protection is of particular importance to the management and other employees of UBAG i.L.. Personal data, such as the name, address, e-mail address or telephone number of a data subject, is always processed in accordance with the Basic Data Protection Regulation and in compliance with the country-specific data protection provisions applicable to UBAG i.L..

By means of this privacy policy, UBAG i.L. informs the public about the nature, scope and purpose of the personal data we collect, use and process.

Furthermore, this privacy statement informs data subjects of their rights.

Name and address of the controller (legal notice):

The person responsible within the meaning of the EU Data Protection Basic Regulation (DSGVO) and the applicable data protection law for Liechtenstein (DSG) is:

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

Phone: +423 239 35 35; Fax: +423 239 35 37

e-mail: datenschutz@unionbankag.com

Website: www.unionbankag.com

Name and address of the Data Protection Officer (DPO):

Data Protection Officer (DPO)

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

Tel. no. +423 239 35 35 on bank working days from 08:00 to 17:00

e-mail: datenschutz@unionbankag.com

Position of the DPO

UBAG i.L. ensures through the DPO appointed that the DPO is properly and promptly involved in all matters relating to the protection of personal data and is supported by the DPO in the performance of his duties.

The DPO's independence and professional qualifications, as well as the expertise in data protection law and practice to fulfil his or her duties are guaranteed.

Data protection - General information

Every person has the right to protection of their privacy and protection against misuse of their personal data. We will treat your personal data confidentially and in accordance with the statutory data protection regulations and this data protection declaration and the *basic data protection regulation of the EU (2016/679) of 27 April 2016 (DSGVO) and the DSG Liechtenstein of 4 October 2018*.

In close cooperation with our hosting providers, we protect UBAG i.L.'s databases from unauthorized access, loss, misuse or forgery with the usual high level of care.

The use of our website is usually possible without providing personal data. However, if a data subject wishes to make use of special UBAG i.L. services, it may be necessary to process personal data. If it is necessary to process personal data and there is no legal basis for such processing, we will obtain the consent of the data subject (see also the Appendix Definitions of Consent/Authorisation on our website www.unionbankag.com under the heading "Data Protection").

We would like to point out that data transmission on the Internet (e.g. when communicating by e-mail) can have security gaps despite the high security requirements we have created. A complete protection of data against access by third parties is not possible.

As an affected (natural) person, it is in your personal interest to secure the system(s) you use (PC, laptop, etc.) against unauthorized access by third parties, to use sufficient password protection and not to pass on the password to third parties, as well as to install and also update an anti-virus protection ("Internet Security") that is proven in the market.

UBAG i.L. Privacy Information according to DSGVO/DSG (info-sheet)

UBAG i.L. provides clients, interested parties, job applicants and other third parties as contact groups (natural persons as stakeholders) resident in an EU/EEA member state with separate data protection information, which can be found on our website www.unionbankag.com under the heading "Data Protection" (Data Protection Info Sheet), in electronic or physical form (Art. 13, 14 and 21 DSGVO and Art. 30, 32 f. DSG: information obligations and right of objection).

Collection of general data and information

UBAG i.L.'s websites collect a number of general data and information each time a data subject or automated system accesses the website. This general data and information is stored in the server log files.

The following can be recorded

- (1) used browser types and versions,
- (2) the operating system used by the accessing system,
- (3) the website from which an accessing system accesses our website (so-called referrer),
- (4) the sub-websites which are accessed via an accessing system on our website,
- (5) the date and time of access to the website,
- (6) an Internet Protocol (IP) address,
- (7) the Internet service provider of the accessing system, and
- (8) other similar data and information which serve to avert danger in the event of attacks on our information technology systems.

When using this general data and information, UBAG i.L. does not draw any conclusions about the person concerned. Rather, this information is required in order (1) to deliver the contents of our website correctly, (2) to optimise the contents of our website as well as the advertising for it, (3) to ensure the permanent operability of our information technology systems and the technology of our website and (4) to provide law enforcement authorities with the information necessary for criminal prosecution in the event of a cyber attack.

This anonymously collected data and information is therefore evaluated by UBAG i.L. both statistically and with the aim of increasing data protection and data security in our company, ultimately ensuring an optimum level of protection for the personal data processed by us. The anonymous data in the server log files are stored separately from all personal data provided by a data subject.

Definitions

UBAG i.L.'s data protection declaration is based on the terms used by the European legislator when the Basic Data Protection Regulation (DSGVO) was adopted and the DSG was amended.

Our privacy policy should be easy to read and understand for the public as well as for our customers and business partners. To ensure this, we explain the terms used. You will find these terms on our website www.unionbankag.com under the heading "Data Protection".

Cookies and Web Beacons

Our website uses cookies and web beacons for an optimized display and greater user-friendliness. In addition, cookies are used in certain areas of our website to better understand your interests and to be able to provide you with an individually tailored web offering.

Cookies do not damage your computer and do not contain viruses.

Most of the cookies we use are so-called "session cookies". They are automatically deleted at the end of your visit. Other cookies remain stored on your end device until you delete them. These cookies enable us to recognize your browser on your next visit.

What is a cookie?

Cookies are small files that enable the storage of specific information related to the device on the user's access device (PC, smartphone or similar). On the one hand, they serve the user-friendliness of websites and thus the users (e.g. storage of login data). On the other hand, they serve to record statistical data on website use and to be able to analyse this data in order to improve the offer. The users can influence the use of cookies.

You can manage many online ad cookies from companies through the websites.

How can I disable cookies?

You can set your browser so that you are informed about the setting of cookies and allow cookies only in individual cases. You can exclude the acceptance of cookies for certain cases or in general and activate the automatic deletion of cookies when closing the browser.

If you are not familiar with this function, look for the help function in your browser or ask your browser provider. Please note, however, that you will not be able to use all the possibilities of our digital communication and web offers if you deactivate cookies in your browser program.

Access data / Server log files

The provider of the pages automatically collects and stores information in so-called server log files, which your browser automatically transmits to us. These are:

- Browser type and browser version;
- the operating system used;
- Referrer URL (the previously visited page);
- Host name of the accessing computer or IP address and the requesting provider;
- Date and time of the server request;
- transferred data volume;
- Message about successful retrieval.

These data cannot be assigned to specific persons. A consolidation of this data with other data sources is not carried out. We reserve the right to check this data subsequently if we become aware of concrete indications of illegal use.

We use the log data for statistical evaluations for the purpose of operation, security and optimization of the offer as well as to determine needs and to adapt the contents individually. Personal data is generated if consent

is given or if this is permitted by law. We also reserve the right to check the log data retrospectively if there is a justified suspicion of illegal use based on concrete evidence.

The collected data can be used for statistical analysis or for the targeted placement of content on the website.

Contact / Contact form

When contacting the provider (e.g. via contact form or e-mail), the user's details are stored for the purpose of processing the enquiry and in the event that follow-up questions arise. We will not pass on this data without your consent.

Apps, QR Codes and similar applications

When you scan a QR Code, the external service provider who creates our QR Codes on our behalf may collect certain information from your mobile device (such as your mobile device ID and IP address). The service provider uses this information solely on our behalf and for the purpose of providing anonymous statistical analysis of the visitors to our website and the users of our services.

Newsletter order, data and cancellation

With the newsletter we inform you about us and our offers and services.

If you would like to receive the newsletter, we require a valid email address from you as well as information that allows us to verify that you are the owner of the email address provided or that the owner agrees to receive the newsletter (so-called confirmation email with **"double opt-in" procedure**). Further data will not be collected. This data is only used for sending the newsletter and will not be passed on to third parties.

When you register for the newsletter, we save your IP address and the date of registration. This storage is solely for the purpose of proof in the event that a third party misuses an e-mail address and registers to receive the newsletter without the knowledge of the entitled party.

The click behaviour in the newsletter is recorded and automatically analysed for statistical purposes and for the individual adaptation of the content.

You can revoke your consent to the storage of the data, the e-mail address and its use for sending the newsletter at any time. You can revoke your consent via a link in the newsletter itself, in your profile area or by sending a message to the above-mentioned contact options (see also special information on "Right of revocation" in the data protection information sheet, which can be found on our website www.unionbankag.com under the heading "Data protection").

Newsletter tracking (tracking pixels)

The following information concerns a possible offer by those responsible to retrieve newsletters electronically and to have them sent to an e-mail address provided by the person concerned. The e-mail address of the person responsible must be confirmed by the person responsible before delivery ("double opt-in procedure").

Newsletters contain so-called tracking pixels. A pixel-code is a thumbnail image embedded in e-mails sent in HTML format to enable log file recording and analysis. This allows a statistical evaluation of the success or failure of online marketing campaigns. The embedded pixel-code enables UBAG i.L. to recognize whether and when an e-mail was opened by a person affected and which links in the e-mail were called up by the person affected.

Such personal data collected via the tracking pixels contained in the newsletters are stored and evaluated by the data controller in order to optimise the newsletter dispatch and to adapt the content of future newsletters even better to the interests of the data subject. This personal data will not be passed on to third parties, nor will it be used for any other purposes other than those stated above.

Revocation

In the event of revocation by the data subject, these personal data shall be deleted by the controller. UBAG i.L. automatically interprets a cancellation of receipt of the newsletter as a revocation. It thus unilaterally initiates the above measures.

Data protection for applications and the application process

The controller collects and processes the personal data of applicants for the purpose of processing the application. The processing may also be carried out electronically. This is particularly the case if an applicant submits relevant application documents to the controller electronically, for example by e-mail with pdf files or other file types as an attachment via a web form available on the website.

If the data controller concludes an employment contract with an applicant, the transmitted data are stored at UBAG i.L. for the purpose of processing the employment relationship, in compliance with the statutory provisions and to ensure access by unauthorised employees and third parties.

If no employment contract is concluded by the controller with the applicant as a data subject, the application file shall be deleted automatically and without further notice to the applicant 12 months after the notification of the decision to reject the application, unless deletion conflicts with any other legitimate interests of the controller. Other legitimate interests in this sense include, for example, the obligation to provide evidence in legal proceedings.

Registration function

The data entered during registration is for the purpose of using the offer. Users can be informed by e-mail about information relevant to the offer or registration, such as changes in the scope of the offer or technical circumstances. The collected data can be seen from the input mask within the scope of registration. This includes, for example, name, postal address, e-mail address, IP address and its purpose.

Privacy policy for the use of Google Analytics

This website uses Google Analytics, a web analysis service of Google Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site.

The information generated by cookies about your use of this website is usually transferred to a Google server in the USA and stored there. However, in the event that IP anonymisation is activated on this website, your IP address will be shortened beforehand by Google within member states of the European Union or in other contracting states of the Agreement on the European Economic Area.

Only in exceptional cases is the full IP address transferred to a Google server in the USA and shortened there. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. The IP address transmitted by your browser within the framework of Google Analytics is not merged with other Google data.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you agree to the processing of the data collected about you by Google in the manner described above and for the aforementioned purpose.

SSL Encryption

This site uses SSL encryption for security reasons and to protect the transmission of confidential content, such as the requests you send to us as site operator. You can recognise an encrypted connection by the fact that the address line of the browser changes from "http://" to "https://" and by the lock symbol in your browser line. If the SSL encryption is activated, the data that you transmit to us cannot be read by third parties.

Integration of third party services and content

Despite the great care taken by UBAG i.L., it cannot be ruled out that third party content, such as videos from YouTube, map material from Google Maps, RSS feeds or graphics from other websites may be integrated within UBAG i.L.'s online offerings. This always presupposes that the providers of such content (hereinafter referred to as "third-party providers") are aware of the IP address of the users.

The IP address is a necessary basis for the third party providers to be able to send the content to the browser of the respective user. The IP address is therefore necessary for the display of this content. We endeavour to use only such content whose respective third-party providers use the IP address only to deliver the content. However, we have no influence on this if the third-party providers store the IP address for statistical purposes, for example. As far as we are aware of this, we inform the users about it.

Objection advertising mails

The use of contact data published within the scope of the legal notice obligation for the transmission of not expressly requested advertising and information material is hereby contradicted. The operators of the website expressly reserve the right to take legal action in the event of unsolicited sending of advertising information, such as spam e-mails.

Applicable law and place of jurisdiction

The Basic Data Protection Regulation (DSGVO) and the Data Protection Act of Liechtenstein apply to the UBAG i.L. website.

Any disputes between you as a visitor and user of the UBAG i.L. website arising from the operation of or visit to the website shall be subject to the exclusive jurisdiction of the courts at the registered office of UBAG i.L., unless another mandatory place of jurisdiction is applicable.

Changes to this privacy policy

UBAG i.L. is entitled to amend this Privacy Policy as necessary. If changes are made to the statement, it may take up to 30 working days before new data protection procedures are implemented by UBAG i.L. or the necessary processes are in place. Please visit this page regularly to identify any changes. In the event of any changes, we will draw your attention to them in particular (short message).

Scope of the privacy statement

This privacy policy applies to UBAG i.L. and its employees.

The privacy policy covers all processing of personal data. In countries in which data of legal persons are protected in the same way as personal data, this data protection declaration also applies in the same way to data of legal persons or partnerships.

Anonymised data, e.g. for statistical evaluations or investigations, are not subject to this data protection declaration.

Consent to the privacy policy

By using UBAG i.L.'s website or accessing specific services, you as a data subject agree to the content of the data protection declaration, which forms an integral part of UBAG i.L.'s General Terms and Conditions.

The customer and third parties such as interested parties (hereinafter referred to as users) accept the content of the data protection declaration and the data protection information in the respective updated version. In the event of contradictions, the documents Data Protection Declaration and Data Protection Notice take precedence over the General Terms and Conditions of Business (GTC).

The latest version of the data protection declaration can be found on our website www.unionbankag.com under the heading "Data protection".

Legal information / Disclaimer

UBAG i.L. accepts no responsibility for the accuracy and completeness of the information provided.

Liability claims against the author for material or immaterial damages arising from access to or use or non-use of the published information, misuse of the connection or technical faults are excluded by UBAG i.L..

All offers published by UBAG i.L. in digital or electronic form are non-binding. Parts of the pages or the complete publication including all offers and information might be extended, changed or partly or completely deleted by UBAG i.L. without separate announcement.

Liability for links

References and links to third-party websites are outside the scope of responsibility of UBAG i.L.. UBAG i.L. accepts no responsibility whatsoever for third-party websites, i.e. websites outside the UBAG i.L. website. Access and use of such websites is at the user's own risk.

Copyrights

The copyright and all other rights to the content, images, photographs or other files on the UBAG i.L. website belong exclusively to the company, its suppliers or the specifically named rights holders. Any reproduction or use of any element requires the prior written consent of the copyright holder concerned.

Annex: Definitions (to be found on our website www.unionbankag.com under the heading "Data protection")