

## Privacy statement for clients

### Data processing in general

#### Scope of the processing of personal data

The processing of personal data is limited to data that is required to operate a functional website and for the provision of content and services. The processing of personal data of our users is based on the purposes agreed or on a legal basis (GDPR). We only collect personal data that is necessary to implement and process our tasks and services or if you provide data voluntarily.

#### Your rights (rights of the persons affected)

You have the right to request information about any of your personal data we process. In particular, you have the right to request information about the purpose of the processing, the categories of personal data, the categories of recipients who will have access or were disclosed with your data, the duration periods for saving the personal data, whether there is a right to adjust/correct, erase, restrict or object, transmission of data, the source of your data if not collected through us and if we use automatic decision-making technologies including profiling.

Additionally, you have the right to revoke a previously granted consent to use your personal data at any time. If you believe that the processing of your personal data is inconsistent or contradicts the applicable data protection laws you have the possibility to lodge a complaint with the data protection office.

### Description and scope of data processing

#### Purpose of data processing

We process our clients' personal data for the following services:

- Client mandate management (including administration of legal entities)
- Auditor functions (review, audit)
- Compliance with statutory accounting requirements
- Completion of tax returns for natural persons or legal entities
- Payroll accounting

as well as completion of legal obligations, in particular:

- PGR, WPRG, TRG, due diligence laws, tax legislation and treaties

### Categories of data

The following categories of data are processed in our data directories pursuant to article 4(1) of the GDPR for the purposes of our activities outlined under section 1 above:

Data category	Data description	Data recipient
Client and address data	Name, company name, date of birth, home and/or business address, nationality, occupation, telephone number, e-mail address	External service providers and public bodies
Identification information	Identity documents including copies of passports and official ID papers, utility bills, tax numbers, death certificates, authentication data, including specimen signatures	External service providers and public bodies
Due diligence documentation	Including contracting partners, identification of beneficial owners, business relationship profiles with background information about occupation and private situation (e.g. job and hobbies), World-Check data, checks pursuant to the Liechtenstein Due Diligence Act (DDA; Sorgfaltspflichtsgesetz – SPG)	External service providers and public bodies
Mandate information	Including company documents, bank documentation, correspondence, documents pursuant to the DDA, tax data, resolutions of governing bodies	External service providers and public bodies
Accounting data	Transactions and accounting information	External service providers and public bodies
Correspondence	Client orders, general	External service providers and public bodies

Legal entity information	Articles of association, bylaws, certificates, mandate contracts, signing authorities	No transfer of information
Tax reporting data	Reports based on FATCA, the automatic exchange of information (AEOI) and the Liechtenstein Disclosure Facility (LDF)	External service providers and public bodies

### Legal basis

The data listed under section 2 above will be processed

- on the basis of our contractual relationship with our clients (Article 6(1)(b) of the GDPR);
- in order to fulfil a legal obligation (Article 6(1)(c) of the GDPR);
- to carry out a task in the public interest or in the exercise of official authority (Article 6(1)(e) of the GDPR); or
- for the purposes of the legitimate interests pursued by the data controller or a third party (Article 6(1)(f) of the GDPR).

Processing for the purposes of our legitimate interests may include:

- Processing for the purpose of internal administration
- Evaluations
- Defending against unjustified claims

### Recipients of personal data

Clients' personal data will only be processed by us to carry out our contractual, statutory and regulatory obligations for the purposes listed under section 1 above.

For these purposes, data may be shared with the following:

- Companies within our group of companies for the purpose of internal administration
- External services providers and offices:
  - Banks
  - Asset managers
  - Insurance companies
  - Lawyers



Allgemeine Revisions- und Treuhand AG

- Auditors
- Suppliers
- Subcontractors
- Other cooperation partners
- Associations
- Public interest organisations in Liechtenstein and abroad

If we have statutory or regulatory obligations to fulfil, personal data may be sent in particular to the following:

- Public offices and authorities (e.g. supervisory authorities, courts)
- Tax authorities (including in the scope of AEOI and FATCA)
- Authorities of third countries or international organisations

### **Sharing data with third countries or international organisations**

If we transfer clients' personal data to other countries, it is protected and transferred in accordance with the statutory provisions. We do not transfer your data to countries outside the European Economic Area.

### **Data sources**

We collect data directly (e.g. in meetings or through correspondence with clients; internal background and due diligence checks).

### **Storage periods**

Personal data will be processed and stored for the duration of the business relationship within the framework of the statutory provisions. Once the business relationship has been terminated, these data are retained for 10 years on the basis of statutory provisions (PGR, DDA, Liechtenstein Civil Code [Allgemeines bürgerliches Gesetzbuch – ABGB]). Longer retention periods will be enforced only on the basis of statutory or contractual requirements to retain data or for the purpose of maintaining evidence within any applicable statutory limitation periods.

### **Automated decision-making (Article 22 of the GDPR)**

No automated decision-making processes are applied to clients' personal data. Where such processes are used in individual cases, we inform the clients to the extent required by the law.



Allgemeine Revisions- und Treuhand AG

### **Necessity of the data (Article 13(2)(e) of the GDPR)**

Provision of the data listed under section 2 above is mandatory in order to allow us to offer our clients the services they require and fulfil our statutory obligations. In addition to possible statutory reporting obligations to the responsible supervisory authorities, failure to provide data will result in the non-establishment or termination of the business relationship.

### **Data security**

We use a common encryption technology "SSL" in connection with the highest encryption levels that are supported by your browser. If a page on our website was/is being transmitted encrypted it is shown by the lock symbol in the address bar of your browser.

Additionally, we use appropriate technical and organizational security measures to protect your data from accidental or intentional manipulation, partial or complete loss, destruction, or to prevent unauthorized access by third parties. Our security measures are continuously upgraded according to the latest technological developments.