

## PRIVACY POLICY

MHPR Advisors GmbH. (“we”, “us”, “our”) are committed to protecting and respecting your privacy.

This privacy policy, (“**Privacy Policy**”) and any other documents referred to in it set out the basis on which we collect and process your personal data as a data controller when you use our website or services.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting [www.MHPRadvisors.com](http://www.MHPRadvisors.com), (the “**Site**”) or using our services or apps (“**Services**”), you are accepting and consenting to the practices described in this Privacy Policy.

Please note: This Privacy Policy does not apply to any data you provide to us when we process personal data on your behalf as your data processor i.e. where we process customer data within the cloud service we provide to you, as a business to business service provider.

### DATA CONTROLLER

For the purposes of Swiss, EU and UK data protection laws and any applicable national implementing laws, regulations and secondary legislation relating to the processing of personal data (together “**Data Protection Law**”), the data controller is MHPR Advisors GmbH, , Ziegelwies 7, CH-8852 Altendorf, Switzerland.

### LEGAL BASIS FOR PROCESSING

We will only use your personal data when the law allows us to. Most commonly we will use your personal data in the following circumstances:

- To fulfil our contractual obligations to you.
- Where it is necessary for our legitimate business interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- To comply with a legal obligation.

To the extent we process your personal data for any other purposes, we ask for your consent in advance or require that our partners obtain such consent.

### PERSONAL DATA WE MAY COLLECT ABOUT YOU

We may collect and process personal data about you. Personal data, or personally identifiable information, means any information about an individual from which that individual can be identified. We collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data:** includes first name, last name, user name or similar identifier, title, date of birth and gender.

- **Contact Data:** includes billing address, delivery address, email address and telephone numbers, and business name.
- **Financial Data:** includes bank account and payment card details.
- **Transaction Data:** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data:** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this Site or the Services.
- **Profile Data:** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data:** includes information about how you use our Site and Services, including the full Uniform Resource Locators (URL) clickstream to, through and from our Site and Services (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- **Marketing and Communication Data:** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Location Data:** We also use GPS and other technology to determine your current location. Some of our location-enabled Services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You may be able to withdraw your consent at any time by disabling Location Data in the settings of your device.
- **Aggregated Data:** We also collect, use and share statistical or demographic data for any purpose. This Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.
- **Special Category Data:** We do not collect, store and/or use “special category data” about you. This means details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data. We also do not collect information about criminal convictions and offences.

**If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## HOW PERSONAL DATA IS COLLECTED

We use different methods to collect data from and about you including via:

- **Direct Interactions.** You may give us your Identity, Contact and Financial Data when you fill in forms or correspond with us by post, phone, email or otherwise. This includes personal data you provide when you register to use our Site or to receive our newsletter, subscribe to use our Services, create an account to use our Site or Services, request marketing to be sent to you, search for a product or place an order on our Site, participate in discussion boards or other social media functions on our Site, enter a competition, promotion or survey, attend a conference or webinar, give us feedback or contact us and when you report a problem with our Site or Services.
- **Purchases:** If you make purchases via our Site or within any Services, or register for an event or webinar, we may require you to provide your Identity, Contact, Financial and Transaction Data.
- **Community:** If you register for an online community that we provide, we may ask you to provide us with Identity, Contact, Profile and Technical Data.
- **Automated Technologies or Interactions.** As you interact with our Services, Sites or emails, we automatically collect Technical Data about your device, browsing actions, patterns, Location Data and Usage Data. We collect this personal data by using cookies, server logs, web beacons, pixels, and similar technologies about your device, and your use of our Site and Services. We may also receive Technical Data and Location Data about you if you visit other websites using our cookies. Please see the Cookie section below for further details.

## PERSONAL DATA WE RECEIVE FROM OTHER SOURCES

We work closely with third parties that include, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies and other organizations.

- **Technical Data:** from analytics providers, advertising networks and search information providers.
- **Contact, Transaction and Financial Data:** from providers of technical, payment and delivery services.
- **Identity and Contact Data:** from providers of chat/communication/helpdesk services with customers including via email.

- **Email Communications and Contact Data:** from providers of email communications service providers.
- **Business Contact and Financial Data:** from CRM service providers who manage contacts and keep a record of communications/ interactions with customers.
- **Contact Data and Financial Data:** from cloud accounting systems that store email and names of persons sent invoices by email.

If you desire a copy of our Third Party Suppliers List, please contact us.

## **PERSONAL DATA WE COLLECT FROM OTHER SOURCES**

We also collect personal data about you from publicly available sources. We may combine this information with personal data provided by you. This helps us update, expand, and analyse our records, identify new customers, and create more tailored advertising to provide services that may be of interest to you. We also use this for the purposes of targeted advertising, delivering relevant email content, event promotion and profiling, determining eligibility and verifying Contact Data. The personal data we collect includes:

- **Identity and Contact Data:** from publicly available sources such as commercial registers.
- **Identity, Contact and Profile Data:** that is published about you on social media profiles: such as LinkedIn, Facebook, Twitter.

## **COOKIES**

We use cookies or similar tracking technology, on our Site and in the Services to distinguish you from other users of our Site and Services. Please see our Cookie Policy for full details about our use of Cookies.

You can set up your browser options to stop your computer accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use the whole of the Site or all functionality of the Services.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org). To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

## **Pixel-Tags**

We may use "pixel tags," which are small graphic files that allow us to monitor the use of the Site and Services. A pixel tag can collect information such as the IP (Internet Protocol) address of the computer that downloaded the page on which the tag appears; the URL (Uniform Resource Locator) of the page on which the pixel tag appears; the time the page containing the pixel tag was viewed; the type of browser that fetched the pixel tag; and the identification number of any cookie on the computer previously placed by that server. When corresponding

with you via HTML capable e-mail, we may use "format sensing" technology, which allows pixel tags to let us know whether you received and opened our e-mail.

### **Web Beacons**

Some of our web pages may contain electronic images known as web beacons (sometimes known as clear gifs) that allow us to count users who have visited these pages. Web beacons collect only limited information which includes a cookie number; time and date of a page view; and a description of the page on which the web beacon resides. We may also carry web beacons placed by third party advertisers. These web beacons do not carry any personal data and are only used to track the effectiveness of a particular campaign.

### **Do not track**

We do not support Do Not Track ("DNT").

Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the "Preferences" or "Settings" page of your web browser.

### **USES MADE OF PERSONAL DATA**

We describe below all the ways we plan to use your personal data, and on which of the legal bases we rely to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal grounds we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing</b>
To register you as a new customer	Identity Data, Contact Data	Performance of a contract with you
To process and deliver your order including: <ul style="list-style-type: none"> <li>• Manage payments, fees and charges</li> <li>• Collect and recover money owed to us</li> </ul>	Identity Data, Contact Data, Financial Data, Transaction Data, Marketing and Communications Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: <ul style="list-style-type: none"> <li>• Notifying you about changes to our terms,</li> </ul>	Identity Data, Contact Data, Profile Data, Marketing and Communications Data	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

<p>this Privacy Policy, the Site or Services</p> <ul style="list-style-type: none"> <li>Asking you to leave a review or take a survey</li> </ul>		<p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>Identity Data, Contact Data, Profile Data, Usage Data, Marketing and Communications Data</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and this Site (including troubleshooting, data analysis, testing, system maintenance, support, updates, reporting and hosting of data)</p>	<p>Identity Data, Contact Data, Technical Data</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant Site and Services content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>Identity Data, Contact Data, Profile Data, Usage Data, Marketing and Communications Data, Technical Data</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our Site and Services, marketing, customer relationships and experiences</p>	<p>Technical Data, Usage Data</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To help our AI models to create anonymous benchmarking.</p>	<p>Identity Data, Contact Data, Technical Data, Usage Data, Profile Data, Marketing and Communications Data</p>	<p>Necessary for our legitimate interests (to develop the Services for your benefit and for our customers generally)</p>

To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity Data, Contact Data, Technical Data, Usage Data, Profile Data, Marketing and Communications Data	Necessary for our legitimate interests (to develop our Services and grow our business)
To enable you to apply to work for us	Identity Data, Contact Data, Financial Data, Technical Data	(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated) and to enable you to apply to work for us

We will not sell or rent your personal data to anyone.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to obtain an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## DISCLOSURE OF YOUR PERSONAL DATA

**Personal data we share with third parties.** We may share your personal data with the third parties set out in our Third Party Supplier List for the purposes set out in the table above. Below is a summary of the types of third parties used:

- Any member of our group, which means our subsidiaries as well as our ultimate holding company and its subsidiaries.
- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you to provide services such as IT and system administration services, email communications, hosting services, backup services, credit card processing, research, development, marketing and customer support.
- Analytics and search engine providers that assist us in the improvement and optimisation of our Site and Services.
- Professional advisors acting as service providers to us in relation to the Site or Services - including lawyers, bankers, auditors, and insurers who provide consultancy, banking, legal, insurance and accounting services.

- Tax authorities, regulators and other authorities who require reporting of processing activities in certain circumstances.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose personal data about identifiable individuals to our advertisers, but we may provide them with Aggregated Data about our users (for example, we may inform them that 300 men aged over 40 have clicked on their advertisement on any given day). We may also use such Aggregated Data to help advertisers reach the kind of audience they want to target (for example, women living in London). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

**Personal data we disclose to third parties.** We may disclose your personal data to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we or a member of our group of companies or substantially all their assets are acquired by a third party, in which case personal data held by them about their customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data to comply with any legal obligation, or in order to enforce or apply our terms and conditions, terms of use and/or any other legal agreements; or to protect our rights, property, safety, our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- When included in Aggregated Data in the normal course of operating our business; for example, with other Site or Services users, selected partners, our customers or publicly to show trends or benchmark the general use of our Site and Services.

## **INTERNATIONAL TRANSFERS OF EU, SWISS AND UK PERSONAL DATA**

Our Services are global and your personal data may be stored and processed in any country where we have operations, our staff are located or where we engage service providers engaged in, among other things, the fulfilment of your order, the processing of your payment details or the provision of support services. This will involve a transfer of your personal data to countries outside of your country of residence, where data protection rules are different from those of your country of residence.

Processing of your personal data will involve a transfer of data to countries outside the European Economic Area ("**EEA**"), Switzerland or the UK.



We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this Privacy Policy. In particular this means that your personal data will only be transferred to a country that provides an adequate level of protection (for example, where the European Commission or the UK Data Protection Authority (“**ICO**”) has determined that a country provides an adequate level of protection) or where the recipient is bound by standard contractual clauses according to conditions provided by the European Commission or ICO.

Our Site and Services are accessible via the internet and may potentially be accessed by anyone around the world. Other users may access the Site or Services from outside the EEA, Switzerland or the UK. This means that where you chose to post your personal data on our Site or within the Services, it could be accessed from anywhere around the world and therefore a transfer of your personal data outside of the EEA, Switzerland or the UK may be deemed to have occurred.

## **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. For example, all information you provide to us is stored on our secure servers. Any credit card information or payment transactions will be encrypted using SSL technology.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Site or Services, you are responsible for keeping this password confidential. You may not share any password with anyone. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will endeavour to protect your personal data, we cannot guarantee the security of your personal data transmitted to our Site or the Services. Any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

## **LINKS TO OTHER WEBSITES**

Our Site and Services may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **YOUR USE OF BLOGS, FORUMS, CHAT ROOMS AND COMMUNITY**

Any information that you post to areas of the Site or Services that is viewable by others (for example, to a blog, forum, chat-room or community) will not be treated as proprietary, private, or confidential. We have no obligation to monitor such posts to the Site or Services or to exercise any editorial control over such posts; however, we reserve the right to review such posts and to remove any material that, in our judgment, is not appropriate.

Posting, transmitting, promoting, using, distributing or storing content that could subject us to any legal liability, whether in tort or otherwise, or that is in violation of any applicable law or regulation, or otherwise contrary to commonly accepted community standards, is prohibited, including information and material protected by copyright, trademark, trade secret, nondisclosure or confidentiality agreements, or other intellectual property rights.

You will indemnify us against any and all damages, including our legal fees, that we incur for any information that you post to our Site or any part of the Services, blog, forum chat room or community that we may provide.

## **DATA RETENTION**

We retain personal data for as long as reasonably necessary to fulfil the purposes for which it was provided or collected, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint, if we reasonably believe there is a prospect of litigation in respect of our relationship with you, to comply with law enforcement requests, maintain security, prevent fraud and abuse, resolve disputes, enforce our legal agreements, or fulfil your request to “unsubscribe” from further messages from us.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

This will be for as long as we provide access to the Site or Services to you, your account with us remains open or any period set out in any relevant contract you have with us.

We will retain some anonymised information after your account has been closed and we may use this for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Please note: After you have closed your account or deleted information from your account, any information you have shared with others will remain visible. We do not control data that other users may have copied from the Site or Services. Your profile may continue to be displayed in the services of others (e.g. search engine results) until they refresh their cache or update their systems.

## **YOUR RIGHTS**

You have the right under Data Protection Law, free of charge, to request:

- Access to your personal data.
- Rectification or deletion of your personal data.
- A restriction on the processing of your personal data.
- Object to the processing of your personal data.
- A transfer of your personal data (data portability) in a structured, machine readable and commonly used format.
- Withdraw your consent to us processing your personal data, at any time.

If you wish to exercise any of the above rights, please contact us as set out at the end of this Privacy Policy. We will respond to such queries within 30 days and deal with requests we receive from you, in accordance with the provisions of Data Protection Law. Occasionally it could take us longer, if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or if we are permitted to do so under applicable law. Alternatively, we could refuse to comply with your request in these circumstances.

To comply with your request, we may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. If you don't provide information we request, we may not be able to respond to or comply with your request.

## **MARKETING COMMUNICATIONS**

- **Marketing:** We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.
- **Promotional Offers from us:** We will send you marketing emails if you "opt in" to receive marketing emails when registering on our Site, or if you have enquired about, or purchased any of our goods or services from us and you have not opted out of receiving such marketing.
- **Third Party Marketing:** We will obtain your express opt-in consent before we share your personal data with any third party for marketing purposes.
- **Opt out:** Please note that, if you change your mind about being sent marketing emails you can "opt out" at any time by clicking the "unsubscribe" link at the bottom of any marketing email you receive from us. Once you "opt out", you will no longer receive any marketing emails from us; you will need to unsubscribe separately from any emails you receive from

third parties. We will continue to communicate with you regarding your service billing and support via email and where we send push notifications from time to time in order to update you about any service updates, events and promotions we may be running. If you no longer wish to receive these communications, please disable these in the settings on your device.

## **COMPLAINTS**

Our intention is to meet the highest standards when collecting and using personal data. For this reason, we take complaints we receive very seriously. We encourage users to notify us if they think that our collection or use of personal data is unfair, misleading or inappropriate. If you have any complaints about our use of your personal data, please contact us as set out at the end of this Privacy Policy or contact your local data protection supervisory authority.

For Swiss individuals: The Federal Data Protection and Information Commissioner (FDPIC), Feldeggweg 1, CH - 3003 Berne Switzerland.

Our EU and UK representative is: PrighterGDPR-Rep by Maetzler Rechtsanwalts GmbH & Co KG, c/o MHPR Advisory Services GmbH, Schellinggasse 3/10, 1010 Vienna, Austria; <https://prighter.com>. Please add the following subject to all correspondence: ID-12611561279.

## **AGE OF USERS**

This Site and the Services are not intended for and will not be used by anyone under the age of 18.

## **CHANGES TO OUR PRIVACY POLICY**

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our Privacy Policy.

This Privacy Policy was last updated on 1 December 2023 and this version replaces any other Privacy Policy previously applicable from this date.

## **CONTACT**

If you have any questions, comments or requests regarding our privacy practices or about this Privacy Policy please contact us as follows.

By post: MHPR Advisors GmbH, Ziegelwies 7, CH-8852 Altendorf, Switzerland.

By email: hello [at] mhpradvisors.com.