



KONTORA

Ein Unternehmen von AITI Tiedemann Global

Privacy Notice

Our handling of your data and your rights – Information pursuant to Articles 13, 14 and 21 of the General Data Protection Regulation

With the following information, we would like to provide you with an overview of how we process your personal data and of your rights under data protection law. The specific data we process and the purposes for which we use it depend primarily on the services you have requested or agreed to. We primarily process your personal data, or that of your contact person, in connection with the management of your participation in an investment fund and/or the brokerage of participations in investment funds or investments in financial instruments.

1. Who is responsible for processing my personal data, and whom can I contact?

The responsible entity is:

Kontora Kapitalverwaltungs GmbH
Jungfernstieg 51
20354 Hamburg
Phone: +49 40 3290 888-67
Email: contact@kontora-kvg.com

You can reach our Data Protection Officer at:

Email: ds-kunden@ibs-data-protection.de
Phone: 040-540 90 97 80

2. What sources of data do we use, and what data do we process?

We process personal data that we receive from you in the course of our business relationship, in particular in connection with your participation in an investment fund or the brokerage of investments in investment funds or financial instruments. In addition, where necessary to provide our services, we process personal data that we lawfully obtain from other companies or third parties (e.g., for executing orders, fulfilling contracts or based on your consent). Furthermore, we process personal data that we lawfully obtain from publicly accessible sources (e.g., debtor directories, land registers, commercial and association registers, the press and other media).

2.1 Categories of personal data / types of data

Relevant personal data includes personal details (such as your name, address and other contact details, including your telephone number and email address, date and place of birth, gender and nationality), identification data (e.g., data from an identity document) and authentication data (e.g., specimen signatures). It may also include order data; data relating to the performance of our contractual obligations (e.g., transaction data, credit limits and product data, such as credit and custody account transactions); information about your financial situation (e.g., creditworthiness, scoring/rating and source-of-assets data); professional information; advertising and sales data; documentation data (e.g., consultation records); register and tax data; data relating to your use of the telemedia services we provide (e.g., the times at which you access our websites, apps or newsletters, and the pages you click on or entries you make); and other comparable data.



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3. For what purposes do we process your data, and on what legal basis?	We process your personal data in accordance with the General Data Protection Regulation (GDPR), the Federal Data Protection Act (BDSG), and sector-specific data protection regulations. The legal basis for processing your personal data according to sections 2.1 and 2.2, as well as section 3.1, is Article 6(1)(b) GDPR (processing for the performance of a contract or pre-contractual measures). The legal basis for processing your personal data according to section 3.2 is Article 6(1)(f) GDPR (legitimate interests). The legal basis for processing your personal data according to section 3.3 is Article 6(1)(a) GDPR (consent). The legal basis for processing your personal data according to section 3.4 is Article 6(1)(c) GDPR (legal obligation).
3.1 To fulfill contractual obligations	The processing of personal data (Article 4(2) GDPR) is carried out to manage your participation in an investment fund managed by us, including for the purpose of joining the fund (e.g., processing your name, address and nationality), and to administer your participation in the fund (e.g., processing your name and contact details, including for investor communications such as invitations to shareholder meetings or responses to your inquiries). Among other things, we process payment transaction data to make payments to you or to execute corresponding orders or transactions on your behalf. In the case of brokering a participation in a foreign investment fund managed by another capital management company, or of investing in financial instruments (such as shares, bonds, certificates or asset investments), we process certain personal data for the purpose of brokering the investment to the capital management company managing the fund, the issuer of the financial instrument or another securities service provider for the purpose of processing the transaction (e.g., your name, address and nationality). The purposes of data processing depend primarily on the specific service required (e.g., participation in an investment fund managed by us or the brokerage of foreign investment funds or financial instruments) and may include needs analyses, brokerage, suitability assessments and the execution of transactions.



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3.2 In the context of balancing interests	If necessary, we process your data beyond what is required to fulfill the contract in order to safeguard our legitimate interests or those of third parties. Examples include: - Reviewing and optimizing processes for needs analyses and direct customer contact; - Advertising and market and opinion research, provided that you have not objected to the use of your data; - Asserting legal claims and defending ourselves in legal disputes; - Ensuring IT security and IT operations; - Preventing and investigating criminal offenses; - Transferring personal data within the AITi Group for the purposes of internal administration, risk management, compliance, auditing and group-wide supervision (see Recital 48 GDPR); - Business management measures and the further development of services and products.
3.3 Based on your consent	If you have given us consent to process personal data for specific purposes (e.g., data transfers), this processing is lawful on the basis of your consent. You may revoke any consent at any time. This also applies to consent declarations you gave us before the GDPR became applicable, i.e., before 25 May 2018. Please note that revocation only takes effect for the future. Processing that took place before revocation remains unaffected.
3.4 Due to legal obligations	Additionally, we are subject to various legal obligations (i.e., statutory requirements), including those arising under the Banking Act, the Capital Investment Code, the Money Laundering Act, the Securities Trading Act and tax laws, as well as regulatory requirements. The purposes of processing include, among other things, verifying identity and age, preventing fraud and money laundering, fulfilling tax-related control and reporting obligations, and assessing and managing risks.



4. Who receives my personal data?	Within our organization, only those departments that need your data in order to fulfill our contractual and legal obligations have access to it. Service providers we engage (processors under Art. 28 GDPR) may also receive data for these purposes. These include companies providing accounting, IT, telecommunications, sales and marketing services. With regard to disclosure to recipients outside our organization, please note that, under the service or subscription agreement concluded with you, we are obliged to maintain confidentiality regarding all information and assessments relating to you of which we become aware. We may disclose information about you only where required by law, where you have given your consent, where this has been contractually agreed or where we are authorized to provide such information. Under these conditions, recipients of personal data may include, for example: - Public authorities and institutions (e.g., the Federal Financial Supervisory Authority and tax authorities) where a legal or regulatory obligation exists. - Other credit institutions, financial services institutions or similar entities to which we transmit personal data in order to manage our business relationship with you (depending on the contract, e.g., correspondent banks and custodian banks). - Tax advisers and auditing firms. - Affiliated companies of the AITi Group ("Affiliates") and their respective managing directors, senior executives, employees and professional advisers (collectively, the "Group Representatives"), including Affiliates based outside the European Economic Area (EEA), in each case to the extent necessary for the performance of the agreement, the use of services, internal administration, risk management, compliance, auditing and group-wide supervision. We ensure that each of these intra-group recipients is subject to confidentiality obligations that are at least as protective as those agreed with you and that your personal data is processed exclusively for the purposes specified in the agreement and in compliance with applicable data protection laws, in particular the GDPR and the German Federal Data Protection Act (BDSG). Other recipients may include entities to which you have consented to the transfer of your data.
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4.1 Use of Artificial Intelligence	Where necessary, we use artificial intelligence (AI) in our internal processes. For example, AI is used to retrieve investment-related documents relevant to the processing (e.g., capital calls and capital account statements) from portals and a designated email inbox, extract relevant data from these documents and prepare it for further processing in downstream systems. AI is used exclusively for the defined purposes. No decisions are made solely by AI. In addition, a staff member reviews and approves the data before it is processed by other systems. Your data will not be made available to third parties for AI training purposes.
5. How long will my personal data be stored?	We process and store your personal data for as long as necessary for our business relationship—for example, for the duration of your participation in an investment company, investment fund and/or financial instrument, including the initiation and execution of the relevant contract or participation. We are also subject to various retention and documentation obligations arising under the German Commercial Code (HGB), the Fiscal Code (AO), the Banking Act (KWG), the Capital Investment Code (KAGB), the Anti-Money Laundering Act (GwG) and the Securities Trading Act (WpHG). The retention and documentation periods specified in these laws range from two to ten years. The storage period is also determined by statutory limitation periods, which may, for example, extend up to 30 years under Sections 195 et seq. of the German Civil Code (BGB); the standard limitation period is three years.
6. Will my personal data be transferred to a third country or an international organization?	Personal data is transferred to third countries (i.e., countries outside the European Economic Area (EEA)) only if this is necessary to execute your orders (e.g., payment or securities transactions), required by law or if you have given us your consent. If required by law, we will inform you separately about the details. In addition, where necessary for the performance of the agreement, internal administration, risk management, compliance, auditing and group-wide supervision, we transfer personal data to affiliated companies of the AITi Group and their Group Representatives located outside the EEA (including the United States). Such transfers are carried out exclusively in accordance with Articles 44 et seq. of the GDPR, i.e. on the basis of an adequacy decision adopted by the European Commission or, where no such decision exists, on the basis of appropriate safeguards, in particular the EU Standard Contractual Clauses (including any applicable UK addenda or equivalent transfer mechanisms). You may request a copy of the appropriate safeguards using the contact details provided above.



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7. What are my data protection rights?	You have the following rights: - to access (Art. 15 GDPR); - to rectification (Art. 16 GDPR); - to erasure (Art. 17 GDPR); - to restriction of processing (Art. 18 GDPR); - to data portability (Art. 20 GDPR). You also have the right to object to the processing of your personal data by us (see the detailed information about your right to object at the end of this privacy notice). Furthermore, you have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format, and to transmit that data to another controller or have it transmitted. Finally, you have the right to lodge a complaint with a data protection supervisory authority (Art. 77 GDPR).
8. Am I required to provide data?	Within the scope of our business relationship, you are required to provide only the personal data that is necessary to establish and perform the business relationship or that we are legally required to collect. Without this data, we will generally have to refuse to enter into a contract or execute an order, or we may no longer be able to perform an existing contract and may have to terminate it. In particular, we are legally required under anti-money laundering laws to identify you before establishing a business relationship, for example by checking your identity document, and to collect your name, place of birth, date of birth, nationality and residential address. To comply with this legal obligation, you must provide us with the necessary information and documents pursuant to Section 11 (4) of the German Anti-Money Laundering Act and notify us immediately of any changes during the business relationship. If you do not provide the required information and documents, we cannot establish the business relationship you seek.
9. Is there automated decision-making in individual cases?	We do not use automated processing to make decisions about the establishment or performance of a business relationship (Article 22 GDPR). Should we use such processes in individual cases, we will inform you separately, if required by law.
10. Will my data be used for profiling (scoring)?	No scoring or profiling based on your data or on data obtained from other sources about you is carried out.
11. How do we protect your personal data against access by third parties?	We maintain up-to-date technical measures to ensure data security, particularly to protect your personal data against risks during data transmission and against unauthorized access by third parties. These measures are adapted to the current state of the art as necessary.

Information about your right to object under Article 21 of the General Data Protection Regulation (GDPR)

1. Right to object based on your particular situation

You have the right to object at any time—on grounds relating to your particular situation—to the processing of your personal data which is based on Article 6(1)(f) GDPR (data processing based on a balancing of interests); this also applies to any profiling based on this provision in accordance with Article 4 No. 4 GDPR, which we may use for credit scoring or marketing purposes.

If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or if the processing is for the establishment, exercise, or defense of legal claims.

2. Right to object to processing for direct marketing purposes

In individual cases, we process your personal data for direct marketing purposes. You have the right to object at any time to the processing of your personal data for such purposes.

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

The objection may be made informally and should preferably be addressed to:

*Kontora Kapitalverwaltung GmbH
Jungfernstieg 51
20354 Hamburg
Phone: +49 40 3290 888-67
Email: contact@kontora-kvg.com*