






KONTORA

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 the processing of your personal data by us and your rights under data protection law. The specific data processed and how it is used primarily depends on the services you have requested or agreed upon with us. Primarily, we process your personal data or that of your contact person in the context of managing your participation in an investment fund and/or in the context of brokering participation in an investment fund or an investment in financial instruments.

<p>1. Who is responsible for data processing and whom can I contact?</p> 	<p>The responsible entity is:</p> <p>Kontora Kapitalverwaltungs GmbH Jungfernstieg 51 20354 Hamburg Phone: +49 40 3290 888- 67 Email: contact@kontora-kvg.com</p> <p>You can reach our Data Protection Officer at:</p> <p>Email: ds-kunden@ibs-data-protection.de Phone: 040-540 90 97 80</p>
<p>2. Which sources and data do we use?</p> 	<p>We process personal data that we receive from you in the course of our business relationship, especially concerning participation in an investment fund or in the context of brokering investment funds or financial instruments. Additionally, we process – as far as necessary for providing our service – personal data that we have lawfully obtained 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 have lawfully obtained from publicly accessible sources (e.g., debtor directories, land registers, commercial and association registers, press, media).</p>
<p>2.1. Categories of personal data / Type of data</p>	<p>Relevant personal data includes personal details (name, address, and other contact details (telephone, email address), date/place of birth, gender, and nationality), identification data (e.g., ID data), and authentication data (e.g., signature specimen). Additionally, this may also include order data, data from the fulfillment of our contractual obligations (e.g., turnover data, credit limits, product data (e.g., credit and custody transactions), information about your financial situation (creditworthiness data, scoring/rating data, source of assets), data on professional relationships, advertising and sales data, documentation data (e.g., consultation protocol), register and tax data, data about your use of our offered telemedia (e.g., time of accessing our websites, apps, or newsletters, pages clicked by us or entries), and other comparable data.</p>
<p>3. For what purposes do we process your data (purpose of processing) and on what legal basis?</p> 	<p>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.</p> <p>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).</p>






KONTORA

	<p>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).</p>
<p>3.1 To fulfill contractual obligations</p> 	<p>The processing of personal data (Article 4(2) GDPR) is carried out to manage your participation in an investment fund managed by us for the purpose of joining the investment fund (e.g., name, address, nationality) and to manage the participation in the investment fund by us (e.g., name, contact details; among other things, for investor communication (e.g., invitation to shareholder meetings, or if you make a contact inquiry to us)). Among other things, we also process your payment transaction data to make payouts or to carry out corresponding orders/transactions for you.</p> <p>In the case of brokering participation in a foreign investment fund managed by another capital management company or investing in financial instruments (such as stocks, bonds, certificates, or asset investments), we process certain data from you for the purpose of brokering the investment to the capital management company managing the investment fund or to the issuer of the financial instrument or to another securities service provider for processing the transaction (e.g., name, address, nationality).</p> <p>The purposes of data processing primarily depend on the specific need (e.g., participation in an investment fund managed by us, brokering foreign investment funds or financial instruments) and may include, among other things, needs analysis, brokerage, suitability assessments, and the execution of transactions.</p>
<p>3.2 Within the framework of balancing interests</p> 	<p>If necessary, we process your data beyond the actual fulfillment of the contract to safeguard legitimate interests of ours or third parties. Examples include:</p> <ul style="list-style-type: none">- Examination and optimization of procedures for needs analysis and direct customer approach;- Advertising or market and opinion research, provided you have not objected to the use of your data;- Assertion of legal claims and defense in legal disputes;- Ensuring IT security and IT operations;- Prevention and clarification of criminal offenses;- Measures for business management and further development of services and products.
<p>3.3 Based on your consent</p> 	<p>If you have given us consent to process personal data for specific purposes (e.g., data transfer), the legality of this processing is based on your consent. Any given consent can be revoked at any time. This also applies to the revocation of consent declarations made to us before the application of the GDPR, i.e., before May 25, 2018.</p> <p>Please note that the revocation only takes effect for the future. Processing that occurred before the revocation is not affected.</p>







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3.4 Due to legal requirements 	<p>Additionally, we are subject to various legal obligations, meaning legal requirements (e.g., Banking Act, Capital Investment Code, Money Laundering Act, Securities Trading Act, tax laws) as well as regulatory requirements. The purposes of processing include, among other things, identity and age verification, fraud and money laundering prevention, fulfillment of tax-related control and reporting obligations, as well as risk assessment and management.</p>
4. Who receives my data? 	<p>Within our organization, only those departments that need your data to fulfill our contractual and legal obligations receive access to it. Service providers we use (processors under Art. 28 GDPR) may also receive data for these purposes. These include companies in the categories of accounting, IT services, telecommunications, as well as sales and marketing.</p> <p>Regarding the disclosure of data to recipients outside our organization, please note that we are obligated under the service or subscription contract agreed with you to maintain confidentiality regarding all customer-related information and evaluations of which we become aware. We may only disclose information about you if legal provisions require it, you have given consent, or we are authorized to provide information.</p> <p>Under these conditions, recipients of personal data may include, for example:</p> <ul style="list-style-type: none">- Public authorities and institutions (e.g., the Federal Financial Supervisory Authority, tax authorities) where a legal or regulatory obligation exists.- Other credit and financial service institutions or similar entities to which we transmit personal data to fulfill the business relationship with you (depending on the contract, e.g., correspondent bank, custodian bank).- Tax consultants and auditing firms. <p>Other data recipients may be those entities for which you have given us consent to transfer data.</p>
4.1. Use of Artificial Intelligence	<p>Where necessary, we use artificial intelligence (AI) as part of our internal processes. For example, AI is used to retrieve process-relevant investment-related documents (e.g., capital calls, capital account statements) from portals and a specific email inbox, extract relevant data from these documents, and prepare the data for further processing in downstream systems.</p> <p>Artificial intelligence is used strictly for the specific defined purpose. No decisions are made solely based on AI. In addition, a staff member reviews and approves the data before it is processed by other systems. Your data will not be disclosed to third parties for the purpose of AI training.</p>
5. How long will my data be stored? 	<p>We process and store your personal data for as long as it is 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 processing of a contract/participation.</p> <p>We are also subject to various retention and documentation obligations arising from the German Commercial Code (HGB), Fiscal Code (AO), Banking Act (KWG), Capital Investment Code (KAGB),</p>




KONTORA

	<p>Anti-Money Laundering Act (GwG), and the Securities Trading Act (WpHG). The retention or documentation periods specified there range from two to ten years.</p> <p>The storage period is also determined based on statutory limitation periods, which, for example, can be up to thirty years under §§ 195 ff. of the German Civil Code (BGB), with the standard limitation period being three years.</p>
<p>6. Will data be transferred to a third country or an international organization?</p> 	<p>Data is only transferred to third countries (countries outside the European Economic Area – EEA) if it is necessary for the execution of your orders (e.g., payment or securities transactions), legally required, or if you have given us your consent. If required by law, we will inform you separately about the details.</p>
<p>7. What are my data protection rights?</p> 	<p>Every data subject has the right:</p> <ul style="list-style-type: none">- to access information (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). <p>You also have the right to object to the processing of your personal data by us (see the detailed objection rights at the end of this privacy notice). Furthermore, you have the right to receive your personal data, which you have provided to us, in a structured, commonly used, and machine-readable format (you may transmit this data to others or have it transmitted). Finally, you have the right to lodge a complaint with a data protection supervisory authority (Art. 77 GDPR).</p>
<p>8. Am I obligated to provide data?</p> 	<p>Within our business relationship, you must provide only the personal data that is necessary for establishing and performing a 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 may no longer be able to perform an existing contract and may have to terminate it.</p> <p>In particular, we are legally obligated under anti-money laundering laws to identify you before establishing a business relationship—e.g., based on your ID—and to collect your name, place of birth, date of birth, nationality, and residential address. To comply with this legal obligation, you must provide the necessary information and documentation under § 11 (4) of the Anti-Money Laundering Act and immediately notify us of any changes that occur during the course of the business relationship. If you do not provide us with the required information and documentation, we are not allowed to establish the business relationship you desire.</p>
<p>9. Is there automated decision-making in individual cases?</p> 	<p>We do not use automated processing to make decisions about the initiation 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.</p>



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10. Will my data be used for profiling (scoring)? 	No scoring or profiling using your data or data from other sources about you is conducted.
11. What do we do to protect your personal data (from third-party access)?	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 on a case-by-case basis

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 data 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 marketing.

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

The objection can be made without any formal requirements and should preferably be directed to:

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20354 Hamburg
Phone: +49 40 3290 888-67
Email: contact@kontora-kvg.com