
ONE Funds AG

Privacy policy

Compliance with data protection laws, namely the Liechtenstein Data Protection Act of March 14, 2002, as amended, and Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of individuals with regard to the processing of personal data, on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation), and thus the protection and confidentiality of your personal data, is an important concern for ONE Funds AG («ONEF»). We process personal data of our customers, business or contractual partners, interested parties, contact persons, suppliers, applicants, employees as well as visitors of our website (www.onefunds.li) in accordance with the data protection regulations and ensure their enforcement in our company. This privacy policy informs you about how our company collects and handles personal data in our role as data controller, and it sets out in particular what rights you have in relation to the personal data.

1. General

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the country-specific data protection regulations applicable to our enterprise. By means of this data protection declaration, our company would like to inform the public about the type, scope and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed of their rights by means of this data protection declaration.

2. Definitions

The data protection declaration of our company is based on the terms used by the European Directive and Ordinance when issuing the Data Protection Basic Regulation. Our data protection declaration should be easy to read and understand for the public as well as for our customers and business partners. To ensure this, we would like to explain the terms used in advance.

We use the following terms, among others, in this Privacy Policy:

2.1 Personal data

Personal data is any information relating to an identified or identifiable natural person (hereinafter "data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

2.2 Person concerned

Data subject is any identified or identifiable natural person whose personal data are processed by the controller.

2.3 Processing

Processing means any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organization, filing, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

2.4 Restriction of processing

Restriction of processing is the marking of stored personal data with the aim of limiting their future processing.

2.5 Profiling

Profiling is any type of automated processing of personal data that consists of using such personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects relating to that natural person's job performance, economic situation, health, personal preferences, interests, reliability, behavior, location or change of location.

2.6 Responsible

A controller is a natural or legal person, public authority, agency or other body which alone or jointly with others determines the purposes and means of the processing of personal data.

2.7 Receiver

A recipient is a natural or legal person, public authority, agency or other body to whom personal data are disclosed, whether or not a third party. However, public authorities that may receive personal data in the context of a specific investigative task under Union or Member State law shall not be considered as recipients.

2.8 Third

Third party means a natural or legal person, public authority, agency or other body other than the data subject, the controller, the processor and the persons who are authorized to process the personal data under the direct responsibility of the controller or the processor.

2.9 Processor

Processor means a natural or legal person, public authority, agency or other body that processes personal data on behalf of the Controller.

2.10 Consent

Consent shall mean any freely given indication of the data subject's wishes for the specific case in an informed and unambiguous manner in the form of a statement or any other unambiguous affirmative act by which the data subject indicates that he or she consents to the processing of personal data relating to him or her.

3. Name and address

Controller or data controller is the natural or legal person, public authority, agency or other body which alone or jointly with others determines the purposes and means of the processing of personal data.

3.1 Responsible entity is:

ONE Funds AG
Austrasse 14
FL-9495 Triesen
Liechtenstein
Phone: +423 388 1000
E-mail: info@onefunds.li

3.2 You can reach our data protection officer at:

ONE Funds AG
Austrasse 14
FL-9495 Triesen
Liechtenstein
Phone: +423 388 1000
E-mail: datenschutz@onefunds.li

If you have any questions regarding individual data processing, please contact the aforementioned data protection officer.

4. Data processing framework

4.1 Categories of data processed and origin

We collect and process personal data that we have permissibly received from you or from publicly accessible sources (for example, commercial register, company register, media) in the course of our business relationship. In principle, we process as little personal data as possible. Depending on the groups of persons, the data processed may differ. Personal data can be collected or (further) processed in every phase of the business relationship, from the initiation of the business to the termination of the business relationship.

In addition to customer data, we may also process personal data of other third parties involved in the business relationship or of persons who use our website (in this regard, see our data protection notice on the website www.onefunds.li).

By personal data we mean the following categories of data:

- Personal data (e.g. name, address, contact details, date and place of birth, nationality)
- Legitimation data (e.g. ID card data)
- Authentication data (e.g. signature sample)
- Other master data
- Data from the fulfillment of contractual obligations (e.g. turnover data)
- Information about the financial situation and professional background (e.g. creditworthiness data, scoring or rating data).

- Documentation data (e.g. interview transcripts)
- Marketing data (e.g. advertising and sales data)
- Technical data
- Information from your electronic traffic with our company (e.g. cookies)
- Data from publicly available sources
- Processing results generated by ourselves
- Data to meet legal and regulatory requirements

We process personal data from the following sources:

- Personal data that we receive from you by means of submitted contracts, forms, their correspondence or other documents
- Personal data obtained or transmitted as a result of the use of products or services (for example, ONEF website).
- Personal data that is permissibly transmitted to us by third parties, by public bodies (e.g. sanction lists of the UN and the EU) or by other companies (e.g. for the execution of orders or for the fulfillment of contracts)
- Personal data - to the extent necessary to provide our service - that we have permissibly obtained from publicly available sources or other sources, such as databases used to verify and monitor business relationships (e.g., judicial, regulatory or administrative actions, memberships and offices)

4.2 Access / Usage Data Website ONE FUNDS

Each time a user accesses our website and each time a file is retrieved, access data about this process is stored in the form of log files. The following data is recorded during an ongoing connection for communication between your internet browser and our web server:

- Date and time of the request
- Name of the requested file
- Page from which the file was requested
- Access status (file transferred, file not found, etc.)
- Web browser and operating system used
- Complete IP address of the requesting computer
- Data volume transferred

For reasons of technical security, in particular to defend against attempted attacks on our web server, this data is stored by us for a short period of time. It is not possible for us to draw conclusions about individual persons on the basis of this data. We subsequently use this personal data exclusively for statistical and anonymous evaluations.

We do not collect or store any personal data beyond this in connection with visits to our website.

4.3 Legal bases and purposes for the processing of personal data

We process personal data in accordance with the provisions of the GDPR on the following legal basis and for the following purposes:

4.3.1 For the fulfillment of a contract or for the implementation of pre-contractual measures

If the processing of personal data is necessary for the performance of a contract (such as the provision of financial services) to which the data subject is a party, the processing is based on Art. 6 (1) lit. b DSGVO. The same applies to such processing operations that are necessary for the implementation of pre-contractual measures, such as in cases of inquiries about our services.

4.3.2 To fulfill legal obligations

If our company is subject to a legal obligation by which the processing of personal data becomes necessary, such as for the fulfillment of tax, supervisory or money laundering obligations, the processing is based on Art. 6 para. 1 lit. c DSGVO.

4.3.3 To protect legitimate interests

Likewise, processing operations may be based on Art. 6 (1) lit. f DSGVO. Processing operations that are not covered by any of the aforementioned legal bases are based on this legal basis if the processing is necessary to protect a legitimate interest of our company or a third party, provided that the interests, fundamental rights and freedoms of you are not overridden. Such legitimate interests include in particular the following processing activities:

- Fraud prevention
- Direct mail
- Transfer of data within a group of companies for internal administrative purposes
- Ensuring network and information security
- Prevention of possible criminal acts

We also collect personal data from publicly available sources for the purposes of customer acquisition and money laundering prevention.

4.3.4 Based on your consent

Art. 6 (1) lit. a DSGVO serves our company as the legal basis for processing operations in which we obtain consent for a specific processing purpose.

4.4 Use and storage of your personal data

4.4.1 Data sharing

Access to your data may be granted both to bodies within and outside our company. Within the company, only offices or employees may process your data if they need it to fulfill our contractual, legal and supervisory obligations and to protect legitimate interests.

If business areas and services of the company are outsourced in whole or in part to group companies (e.g. group-wide coordination tasks in various areas, such as due diligence, risk management or customer relationship management) or service providers outside our group, or if these provide services (such as payment transactions, subscription and redemption of fund units, printing and dispatch of

documents, IT systems and other support functions), this is done in accordance with the applicable legal provisions. All Group companies as well as external service providers or vicarious agents to whom personal data is transferred are contractually obligated to maintain data protection, to process your data only in the context of providing the service, and to comply with data protection instructions and legal requirements. Processors may be companies in the categories of banking services, sales agreements, IT services, logistics, printing services, telecommunications, debt collection, consulting and advisory services, and sales and marketing.

4.4.2 Data deletion and storage

We process and store your personal data for the duration of the entire business relationship, i.e. from the initial initiation to the termination of the contract. After termination of a contract and thus with the discontinuation of the purpose of storage, the duration of storage is determined on the basis of statutory retention and documentation obligations. These retention periods are in some cases 10 years or more.

4.4.3 Automated decision making including profiling

As a matter of principle, our decisions are not based exclusively on automated processing of personal data. In particular, we do not use automated decision-making for the establishment and implementation of the business relationship. Nor do we use profiling measures.

5. Rights and duties

5.1 Available privacy rights

5.1.1 Confirmation right

You have the right to request confirmation as to whether personal data relating to you is being processed. If you wish to exercise this right of confirmation, you can contact the data protection officer at any time.

5.1.2 Right to information

You have the right to receive free information about the personal data stored about you and a copy of this information at any time. This right to information includes the following information:

- the processing purposes
- the categories of personal data that are processed
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular in the case of recipients in third countries or international organizations
- if possible, the planned duration for which the personal data will be stored or, if this is not possible, the criteria for determining this duration
- the existence of a right to obtain the rectification or erasure of personal data concerning him or her, or the restriction of processing by the controller, or a right to object to such processing
- the existence of a right of appeal to a supervisory authority
- if the personal data are not collected from the data subject: any available information on the origin of the data

- the existence of automated decision-making, including profiling, pursuant to Article 22(1) and (4) of the GDPR and - at least in these cases - meaningful information about the logic involved and the scope and intended effects of such processing for the data subject

Furthermore, you have the right to be informed whether personal data has been transferred to a third country or to an international organization. If this is the case, you also have the right to obtain information about the appropriate safeguards in connection with the transfer.

If you would like to exercise this right to information, you can contact the data protection officer at any time.

5.1.3 Right to rectification

You have the right to request the immediate correction of inaccurate personal data concerning you. Furthermore, you have the right to request the completion of incomplete personal data - also by means of a supplementary declaration - taking into account the purposes of the processing.

If you wish to exercise this right of rectification, you may contact the data protection officer at any time.

5.1.4 Right to deletion

You have the right to have the personal data concerning you erased without delay, provided that one of the following reasons applies and insofar as the processing is not necessary:

- The personal data have been exalted or otherwise processed for purposes for which they are no longer necessary
- You have revoked your consent on which the processing was based pursuant to Art. 6 (1) a DSGVO or Art. 9 (2) a DSGVO and there is no other legal basis for the processing
- You object to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Article 21(2) of the GDPR
- The personal data have been processed unlawfully
- The deletion of the personal data is necessary for compliance with a legal obligation under Union or Member State law to which the controller is subject

If one of the aforementioned reasons applies, and you wish to arrange for the deletion of personal data stored by our company, you can contact the data protection officer at any time. He or she will arrange for the deletion request to be complied with immediately.

5.1.5 Right to restriction of processing

You have the right to request the restriction of processing if one of the following conditions is met:

- The accuracy of the personal data is contested for a period enabling the controller to verify the accuracy of the personal data
- The processing is unlawful, but you object to the erasure of the personal data and request instead the restriction of the use of the personal data
- The controller no longer needs the personal data for the purposes of processing, but you need the personal data for the assertion, exercise or defense of legal claims

- You have objected to the processing pursuant to Art. 21 (1) DSGVO and it is not yet clear whether the legitimate grounds of the controller override those of the data subject

If one of the above conditions is met and you wish to request the restriction of personal data stored by our company, you may contact the data protection officer at any time. The data protection officer will arrange the restriction of the processing.

The correction or deletion of data or a restriction of processing shall be notified to the recipients to whom personal data have been disclosed. This obligation to notify shall not apply if this proves impossible or involves a disproportionate effort.

5.1.6 Right of withdrawal

You have the right to revoke consent to the processing of personal data at any time. This also applies to the revocation of declarations of consent given prior to the application of the GDPR, i.e. prior to May 25, 2018. Please note that the revocation only takes effect for the future. Processing that took place before the revocation is not affected. If you wish to exercise your right to revoke consent, you can contact our data protection officer at any time.

5.1.7 Right to data portability

You have the right to receive the personal data concerning you that has been provided in a structured, common and machine-readable format. You also have the right to have this data transferred to another controller by the controller to whom the personal data was provided, provided that the processing is based on consent pursuant to Article 6 (1) (a) of the GDPR or Article 9 (2) (a) of the GDPR or on a contract pursuant to Article 6 (1) (b) of the GDPR and the processing is carried out using automated procedures, unless the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

To assert the right to data portability, you can contact our data protection officer at any time.

5.1.8 Right of objection

You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is carried out on the basis of Article 6 (1) (f) DSGVO, in accordance with Article 21 DSGVO. This also applies to profiling based on these provisions.

Our company shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the assertion, exercise or defense of legal claims.

If our company processes personal data for the purpose of direct marketing, you have the right to object at any time to processing of personal data for such marketing. If you object to our company processing for direct marketing purposes, we will no longer process the personal data for these purposes.

5.2 Exercise of rights

We accept requests for information in writing, together with a clearly legible copy of a valid official form of identification (e.g. passport, identity card, driver's license). You can send your request to the data protection officer of our company.

You can exercise other rights, such as the right to rectification, the right to erasure, the right to restriction of processing, and - where applicable - the right to data portability, by sending us a corresponding notification. Please address this notification to the data protection officer.

6. Right of complaint to the supervisory authority

You have the right to lodge a complaint with a supervisory authority in an EU or EEA member state, in particular in your place of residence, place of work or the place of the alleged breach of the provisions of the GDPR. The supervisory authority responsible for our company is the Liechtenstein Data Protection Authority, Städtle 38, P.O. Box 684, 9490 Vaduz.

If you need the contact details of a supervisory authority in another EU or EEA member state, you can contact the Data Protection Officer.

7. Obligation to provide personal data

We would like to inform you that the provision of personal data is partly required by law (e.g. tax regulations, money laundering prevention, etc.) or may also result from contractual regulations (e.g. information on the contractual partner). Sometimes, in order to conclude a contract, it may be necessary for you to provide us with personal data that must subsequently be processed by us. For example, you are obliged to provide us with personal data if our company concludes a contract with you. Failure to provide the personal data would mean that the contract could not be concluded.

You are not obliged to give consent to data processing with regard to those data that are not relevant for the performance of the contract or are not required by law and/or regulation.

8. Contact form and contact via e-mail

The website of our company contains information that enables a quick electronic contact to our company as well as an immediate communication with us, which also includes a general address of the so-called electronic mail (e-mail address). If you contact our company by e-mail or via a contact form, the personal data you provide will be stored automatically. Such personal data transmitted on a voluntary basis will be stored for the purpose of processing or contacting you. This personal data is not passed on to third parties.

9. Notes on the use of cookies and analysis tools

When calling up our website, the user is informed about the use of cookies for analysis purposes and his consent to the processing of personal data used in this context is obtained. In this context, a reference to this privacy policy is also made.

9.1 Why are cookies used?

All of our company's websites use cookies for statistical purposes as well as to improve the user experience. By using this website, you consent to the use of cookies for this purpose.

9.2 What are cookies?

Cookies are text files that are stored on your electronic device to track your use of the Electronic Services and your preference settings as you navigate between web pages and, if necessary, to remember settings between your visits. Cookies help the developers of the Electronic Services compile statistical information about the frequency of visits to certain areas of the Website and help them make the Electronic Services more useful and user-friendly. A cookie contains a characteristic string of characters that allows the browser to be uniquely identified when you return to the website.

Please note that most Internet browsers automatically accept cookies. You can configure your browsers so that no cookies are stored on your electronic device, cookies can only be accepted by certain websites or there is always a notice before you receive a new cookie. If cookies are deactivated for our website, it may no longer be possible to fully use all the functions of the website.

10. Analysis tools

10.1 Use of analysis tools

We use analysis tools. In this context, pseudonymized data is created and cookies are used to analyze how users use our electronic services. The information generated by the cookies regarding your use of the website (e.g. host name of the electronic device used to access the website (IP address), browser type/version, operating system used, and date/time of the server request) may be transmitted to third party servers and is used for analysis purposes.

10.2 Google Analytics

Our company's website might use Google Analytics, a web analytics service provided by Google, Inc ("Google"). If so,

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 the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there. In the event that IP anonymization is activated on this website, however, your IP address will be truncated beforehand by Google within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity and providing other services relating to website activity and internet usage to the website operator. The IP address transmitted by your browser as part of Google Analytics may be merged with other data from Google. 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. You can also prevent the collection of data generated by the cookie and related to your use of the website (including your IP address) to Google and the processing of this data by Google by downloading and installing the browser plugin available at <https://tools.google.com/dlpage/gaoptout?hl=de>

You can find more information about this at <http://tools.google.com/dlpage/gaoptout?hl=de> or at <https://support.google.com/analytics/answer/6004245?hl=de> (general information about Google

Analytics and data protection). We would like to point out that on this website Google Analytics has been extended by the code "gat._anonymizeIp();" to ensure anonymized collection of IP addresses (so-called IP masking).

11. Data security and data transmission from our website

We use appropriate technical and organizational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction or against unauthorized access by third parties. Our security measures are continuously improved in line with technological developments.

We currently do not offer transport encryption for our website. In the context of the complaint and contact forms, the collected form data is therefore transmitted to us without encryption.

We recommend that you keep your Internet browser up to date so that secure transmission of your data in transit is ensured.

12. Actuality and change of this privacy policy

This privacy policy is currently valid and has a **status of July 1st, 2023**.

Due to the further development of our website and offers on it or due to changed legal or regulatory requirements, it may become necessary to change this privacy policy. You can access and print out the current data protection declaration at any time on the website www.onefunds.li.