

PRIVACY POLICY

BENZ ADVISORY WEBSITE

Preamble

Benz Advisory AG („Benz Advisory“, or „we“, „us“) takes your privacy seriously. We are committed to process any personal information we collect in full transparency, in accordance with applicable laws and regulations, so as to ensure the accuracy, confidentiality and security of your personal information.

This Privacy Policy applies to the personal information we collect from you as an individual through our website located at benz-advisory.com (“Website”).

By accessing the Website you consent to this Privacy Policy and to the processing of personal information described herein. If you do not agree please refrain from accessing the Website.

This Privacy Policy is dated 31 January 2019. It may be updated from time to time, and, hence, we recommend that you check this Privacy Policy from time to time when using the Website.

1. What is personal information?

Personal information is any information that can enable the identification of an individual or a legal entity or that relates to an identified or identifiable individual or legal entity. Information may, as such, enable your identification (like your first and last names or email address), or may enable such identification and provide information when combined with one another. In so far as any such information enable to identify you as a person, whether taken separately or combined with one another, it shall be considered as personal information.

2. What information do we collect from you?

Information that we may collect through your browsing on our Website may (now or in the future) typically consist of:

- **Information you actively provide by**
 - *using communication tools on the Website, e.g. when you provide information through our contact page, in which case such processing will be initiated by you, at your own will and thus with your consent;*

- *registration for our newsletter*, which will require you providing us, at your own will and thus with your consent, your e-mail address to enable us to send you the newsletter subscribed to.

Inter alia, the following personal data may be collected (depending on the information you provide to us): first and family name, contact details (such as e-mail address, place of work, phone number), employer details, work related information, gender. The legal basis for the collection and processing of these information is your consent.

- **Information we receive automatically when you are browsing our Website.**

This information which, other than your internet protocol address, does not contain personal information, includes:

- *Device information*: for instance your hardware model, operating system version or unique device identifier.
- *Log information*: information automatically collected when you browse our Website in server logs include your internet protocol address and device event information (such as crashes, system activity, browser type, browser language as well as date and time of your browsing activities).
- *Cookies, Google Analytics and similar technologies*: cookies, *Google Analytics* or similar technologies are used to collect and store information when you visit our Website.

To find out more about Cookies:

https://knowledge.hubspot.com/articles/kcs_article/reports/what-cookies-does-hubspot-set-in-a-visitor-s-browser

3. **Why do we collect such information?**

- **Information you actively provide:**

Such information is collected to achieve the following purposes:

- *to enter into a business relationship and provide our services to you;*
- *to answer to your queries when you contact us directly;*
- *to enable us to send you the newsletter you have subscribed to.*

Such processing is based on your consent which can be withdrawn at any time by sending an email to info@benz-advisory.com.

- **Information we receive automatically when you are browsing our Website:**

Information collected automatically may be processed for the following purposes:

- *to improve the use and features of the Website;*
- *to understand what services and products you are interested in;*
- *to adjust and develop products and services;*
- *to correct errors;*
- *to provide you with advertising and other information which better reflects your actual interests;*
- *to identify users, who commit unlawful acts or infringe our rights.*

4. Who we may share your information with?

We may disclose and share some of your information with:

- Services providers and processors we may engage with to provide services to us on our behalf, such as hosting or support of our Website, or for payment processing. In providing their services, these providers may access, receive, maintain or otherwise process your information on our behalf. Our contracts with these providers do not permit use of your information for their own purposes, including their marketing purposes. Consistent with applicable legal requirements, we take commercially reasonable steps to require third parties to adequately safeguard your information and only process it in accordance with our instructions;
- Any third party to which we are ordered to disclose such information as a result of a court order, governmental authority and/or by law;
- Any relevant entity for emergency purposes that compel such disclosure;
- Other third parties to the extent required by law or, to the extent permitted by applicable laws or necessary to pursue overriding legitimate interests. We may, by way of example, forward information to criminal prosecution authorities, if necessary, to investigate into illegal behavior, or we may use information in court or debt collection proceedings if necessary to enforce our rights.

5. Where will my information be stored?

We take steps to ensure that the personal information collected under this Privacy Policy is processed according to the provisions of this Privacy Policy and the requirements of applicable law wherever the personal information is located.

Your personal information will be stored and normally processed from and in Switzerland. Notwithstanding this, depending upon the location of our service providers, your information may occasionally be processed outside of Switzerland.

When we transfer information from Switzerland to other countries outside of the European Economic Area, we shall only do so in accordance with the law, notably by entering into data transfer agreements and Standard Contractual Clauses with the relevant entities.

6. How do we protect your personal information?

We are committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use, modification or disclosure to an appropriate level depending upon the sensitivity of the information.

We further contractually ensure that any third party (as described above) equally processes your personal information in a secured way to ensure its confidentiality and integrity.

7. How long do we retain your personal information?

Your personal information actively provided to us with your consent we shall retain as long as you intend to receive our newsletter, you communicate with us or we provide services to you, and we shall delete any and all your information at your request within thirty days following such request.

8. Social media and other websites

Wherever we are present in any of the various social media forums like LinkedIn, you should be familiar with and understand the tools provided by those sites that allow you to make choices about how you share your information in your social media profile(s).

For these forums the privacy practices or policies of these third parties apply, so we encourage you to read the applicable privacy notices, terms of use and related information about how your information is used in these social media environments.

Our Website may contain links to third-party websites, notably through social media feeds; if you follow these links, you will exit our Website. While these third-party websites

are selected with care, we cannot accept liability for the use of your information by these organizations. For more information and details, please consult the privacy terms of the websites you are visiting.

9. What rights to you have in respect of your personal information?

You have the right (i) to submit an information request in order to learn what categories of personal information we are processing about you for what purposes, how we share your information with others and how long we store your information, (ii) to request that we rectify incorrect personal information about you, (iii) to receive a copy of your personal information in a portable format and (iv) to request that we stop processing your personal information.

If you would like to submit such request or should you have any question related to our processing of your personal information or to this Privacy Policy, you may contact us by sending an email to info@benz-advisory.com.

In rare cases we may – to the extent permitted by applicable law – have to partially or entirely refuse to comply with such requests. In such case we shall inform you about the reasons of such refusal.

You are entitled to lodge a complaint with the supervisory authority to the:

Swiss Federal Data Protection
and Information Commissioner
Feldeggweg 1
3003 Berne
Switzerland

For more information please see www.edoeb.admin.ch.

10. Who is the controller

The controller of personal information collected through the Website is Benz Advisory AG, Vogelacherstrasse 18, 8166 Niederweningen, Switzerland,
e-mail: info@benz-advisory.com.

11. Governing Law and Jurisdiction

Any dispute arising out of or related to this Policy shall be subject to Swiss Law, at the exclusion of its conflict of laws rules, and shall be submitted to the exclusive jurisdiction of the Courts competent for Zurich, Switzerland.