



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 give you an overview of how we process your personal data and your rights under data protection law. The specific data processed and how it is used depend largely on the services you request or have agreed to with us. Primarily, we process your personal data or that of your contact person within the scope of fee-based financial investment advisory services for the acquisition of shares in an investment fund or investment assets and/or within the scope of real estate brokerage, real estate loan mediation, and the reporting and monitoring of your assets.	
1. Who is responsible for processing my personal data, and whom can I contact?	Controller: Kontora Family Office GmbH Jungfernstieg 51 20354 Hamburg Phone: +49 40 3290 888-0 Email: contact@kontora.com You can contact the Data Protection Officer at: Email: ds-kunden@ibs-data-protection.de Phone: 040-540 90 97 80
2. What data sources and data do we use?	We process personal data that we receive in the course of our business relationship, especially on the basis of the framework agreement concluded between you and us, including specific agreements (e.g., service agreements for investment searches and advice, asset monitoring, or strategic advice) in our capacity as a family office boutique and as a fee-based financial investment advisor. We also process, where necessary, personal data that we lawfully obtain from other companies or third parties (e.g., for executing orders, fulfilling contracts, or based on your consent). Additionally, 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 may include personal details (name, address, contact details such as telephone number and email address, date and place of birth, gender, and nationality), company information (e.g., commercial register data, shareholder lists, company purpose, and founding date), identification data (e.g., ID card details), and authentication data (e.g., specimen signatures). Further data may include order data, data relating to the performance of our contractual obligations (e.g., investment and transaction data, payment data, credit lines, product data such as credit and deposit account transactions, and investment amounts), information on your financial situation (creditworthiness, scoring/rating data, and origin-of-assets data), employment data, advertising and sales data, documentation data (e.g., advisory logs), register and tax data (e.g., special business income and expenses), data on your use of the telemedia services we offer (e.g., access times to our websites, apps, or newsletters and the pages you click on), 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 German Federal Data Protection Act (BDSG), and other applicable data protection laws. The legal basis for processing data under Sections 2.1, 2.2, and 3.1 is Art. 6(1)(b) GDPR (contract or pre-contractual measures). The legal basis under Section 3.2 is Art. 6(1)(f) GDPR (legitimate interests). The legal basis under Section 3.3 is Art. 6(1)(a) GDPR (consent). The legal basis under Section 3.4 is Art. 6(1)(c) GDPR (legal obligation).
3.1 For fulfilling contractual obligations	Personal data (Art. 4 No. 2 GDPR) is processed to provide fee-based financial investment advisory services regarding the acquisition of investment fund shares or investment assets, and to facilitate such investments with asset management companies, issuers, or other financial service providers. It is also processed for real estate brokerage, real estate loan mediation, and for reporting and monitoring of your assets based on the framework agreement and any specific agreements made with you. The purposes of data processing depend primarily on your specific needs (e.g., investment advisory, beauty contests, selection of banks and managers, real estate brokerage, reporting, etc.) and may include needs analyses, advice, strategic asset allocation, suitability assessments, and the execution of transactions.
3.2 Based on legitimate interests	Where necessary, we process your data beyond what is required to fulfill contractual obligations in order to safeguard our legitimate interests or those of third parties. Examples include: - Analyzing and optimizing needs-assessment and direct-customer-contact processes; - Advertising or market and opinion research (e.g., the Kontora Yearbook), provided that you have not objected to it; - Asserting legal claims and defending ourselves in legal disputes; - Ensuring IT security and 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 development of services and products.
3.3 Based on your consent	If you have given us your consent to process personal data for specific purposes (e.g., data sharing), this processing is lawful on the basis of your consent. You may revoke your consent at any time. This also applies to consent given before the GDPR came into effect on May 25, 2018. Please note that revocation is effective only for the future. Processing carried out before revocation remains unaffected.



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3.4 Due to legal obligations	We are subject to various legal obligations (e.g., the German Trade Regulation Act, the Financial Investment Intermediaries Ordinance, the Money Laundering Act, and tax laws). These require us to verify identity and age, prevent fraud and money laundering, fulfill tax obligations, assess and manage risks, and gather information about your financial knowledge, experience, and goals, as well as special business income and expenses.
4. Who receives my data?	We generally do not share your personal data with third parties unless otherwise specified in these data protection notices. Within our organization, only those departments that require access to your data in order to fulfill our contractual and legal obligations will have access to it. Processors engaged by us (pursuant to 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. To facilitate an investment, we may share, to a limited extent, personal data with the respective bank, manager, or investment management company administering the relevant investment, or with distribution partners appointed by them. The legal basis for sharing such information with the investment management company or its appointed distributor is Art. 6 (1) sentence 1 lit. b GDPR (contract or pre-contractual measures). Regarding the transfer of data to recipients outside our organization, it is important to note that, under the framework agreement between you and us—including any specific annexes agreed upon in individual cases (e.g., service agreements for investment search and advisory, asset monitoring, or strategic consulting)—we are obliged to maintain confidentiality regarding all client-related facts and assessments 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: - Public authorities and institutions (e.g., the Federal Financial Supervisory Authority (BaFin) and tax authorities) where there is a legal or regulatory obligation; - Credit and financial service institutions or similar entities to which we transmit personal data in the course of managing the business relationship with you (depending on the contract, e.g., correspondent banks and custodian banks); - Tax consultants and auditing firms.



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	- 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 data recipients may include entities to which you have consented to the transfer of your data. In special cases, it may be necessary for your data to be processed across the entire group. Data processing within the Kontora Group takes place only if there is a legal basis for it. This is the case where other companies within the Kontora Group act as processors on our behalf (Art. 28 GDPR), where processing is required to fulfill a contract with you (see Art. 6 (1) sentence 1 lit. b GDPR), where you have given us your consent to process your personal data for such purposes (e.g., sharing data) (see Art. 6 (1) sentence 1 lit. a GDPR), where there is a legal obligation to share data (Art. 6 (1) sentence 1 lit. c GDPR), or where there is a legitimate interest pursuant to Art. 6 (1) lit. f GDPR.
4.1 Use of Artificial Intelligence	Where necessary, we use artificial intelligence (AI) within our internal processes. For example, AI is used to retrieve investment-related documents (such as capital calls, capital account statements, etc.) from portals and a designated email inbox and to extract certain data from these documents for further processing in subsequent systems. Artificial intelligence is used exclusively for the defined purposes. No decisions are made solely by AI. Additionally, a staff member reviews and approves the data before it is processed by other systems. Your data will not be made accessible to third parties for AI training purposes.



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5. How long will my data be stored?	Unless stated otherwise in this privacy notice, we store the personal data we obtain in connection with our role as a family office service provider and fee-based financial investment advisor for the duration of our business relationship or as long as we are legally obliged to retain it. If we no longer need your data for the purposes described above, it will be retained only for the applicable statutory retention period and will not be processed for other purposes. This also includes the initiation and execution of contracts. We are also subject to various retention and documentation obligations arising from laws such as the German Commercial Code (HGB), the Money Laundering Act (GwG), and the Securities Trading Act (WpHG). These require us to store data for two to ten years. In addition, the retention period is also based on the statutory limitation periods, which, under Sections 195 et seq. of the German Civil Code (BGB), can be up to thirty years, with the regular limitation period being three years.
6. Will my data be transferred to a third country or an international organization?	Data will only be transferred to countries outside the European Economic Area (EEA) (third countries) if necessary to execute your orders (e.g., payment and subscription orders), required by law, or if you have given your consent. If legally required, 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 under the GDPR: Right of access (Art. 15), right to rectification (Art. 16), right to erasure (Art. 17), right to restriction of processing (Art. 18), and right to data portability (Art. 20). You also have the right to object to the processing of your personal data by us (see the detailed objection information at the end of this privacy notice). 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 supervisory authority (Art. 77 GDPR).
8. Am I required to provide data?	As part of our business relationship, you only need to provide the personal data necessary to establish and carry out the relationship or that we are legally required to collect. Without this data, we generally cannot conclude or fulfill a contract with you. In particular, we are legally obligated under anti-money laundering laws to identify you before establishing the business relationship by checking your ID and collecting your name, place and date of birth, nationality, and residential address. According to Section 11 (4) of the German Money Laundering Act, you must provide us with the necessary information and documents and notify us immediately of any changes during the relationship. If you do not provide the required information and documents, we cannot establish the business relationship you request.
9. Is there automated decision-making in individual cases?	We do not use automated decision-making processes to establish or conduct our business relationship (Article 22 GDPR). If we ever use such procedures, we will inform you separately if required by law.
10. Will my data be used for profiling (scoring)?	We do not use your data for scoring or profiling, nor do we use third-party sources to profile you.
11. How do we protect your personal data against access by third parties?	We maintain current technical measures to ensure data security, in particular to protect your personal data from risks during data transmission and from access by third parties. These measures are continually adapted to reflect the current state of the art.

Information about your right to object under Article 21 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 based on Article 6(1)(f) GDPR (processing based on legitimate interests); this also applies to profiling based on this provision as defined in Article 4 No. 4 GDPR, which we may use for creditworthiness assessments or marketing purposes.

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

2. Right to object to data processing for direct marketing

In some 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 this purpose.

You may submit your objection informally to:

Kontora Family Office GmbH
Jungfernstieg 51
20354 Hamburg
Tel.: +49 40 3290 888-0
Email: contact@kontora.com