



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 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 depends largely on the services you request or have agreed upon 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 acquiring shares in an investment fund or investment assets and/or within the scope of real estate brokerage, real estate loan mediation, as well as reporting and monitoring of your assets.

1. Who is responsible for data processing and who 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:

E-Mail: 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 and are permitted to process from publicly accessible sources (e.g. debtor directories, land registers, commercial and association registers, press, media).







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2.1 Categories of Personal Data / Types of Data	<p>Relevant personal data may include personal details (name, address, contact details such as phone number and email, date/place of birth, gender, nationality), company information (e.g. commercial register data, shareholder lists, company purpose, founding date), identification data (e.g. ID card details), and authentication data (e.g. signature samples). Further data can include order data, data from contract fulfillment (e.g. investment and transaction data, payment data, credit lines, product data such as credit and deposit accounts, investment amount), information on your financial situation (creditworthiness, scoring/rating data, origin of assets), employment data, advertising and sales data, documentation data (e.g. advisory logs), registry and tax data (e.g. special business income/expenses), data on your usage of telemedia offered by us (e.g. access time to our websites, apps or newsletters, clicked pages), and other comparable data.</p>
3. For what purposes do we process your data and on what legal basis? 	<p>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.</p> <p>Legal basis for processing data per Sections 2.1, 2.2, and 3.1 is Art. 6(1)(b) GDPR (contract or pre-contractual measures). Legal basis per Section 3.2 is Art. 6(1)(f) GDPR (legitimate interests). Legal basis per Section 3.3 is Art. 6(1)(a) GDPR (consent). Legal basis per Section 3.4 is Art. 6(1)(c) GDPR (legal obligation).</p>
3.1 For Fulfilling Contractual Obligations 	<p>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.</p> <p>The purpose of the data processing is primarily based 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 transaction execution.</p>




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3.2 Based on Legitimate Interests 	<p>Where necessary, we process your data beyond contractual obligations to safeguard our legitimate interests or those of third parties. Examples include:</p> <ul style="list-style-type: none">- Analysis and optimization of needs assessment and direct customer contact processes;- Advertising or market and opinion research (e.g. Kontora Yearbook), if not objected to;- Assertion of legal claims and defense in legal disputes;- Ensuring IT security and operations;- Prevention and investigation of criminal acts;- Business management measures and development of services and products.
3.3 Based on Your Consent 	<p>If you have given us consent to process personal data for specific purposes (e.g. data sharing), this processing is lawful based on 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: Revocation is only effective for the future. Processing done before the revocation remains unaffected.</p>
3.4 Due to Legal Obligations 	<p>We are subject to various legal obligations (e.g. the German Trade Regulation Act, Financial Investment Intermediaries Ordinance, Money Laundering Act, tax laws). These require us to conduct identity and age verification, fraud and money laundering prevention, fulfill tax obligations, assess and manage risks, and gather information about your financial knowledge, experience, and goals, or special business income/expenses.</p>
4. Who receives my data? 	<p>We generally do not share your personal data with third parties unless otherwise specified in these data protection notices.</p> <p>Within our organization, only those departments that require your data 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.</p> <p>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 acting distributor is Art. 6 (1) sentence 1 lit. b GDPR (contract or pre-contractual measures).</p> <p>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,</p>







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	<p>or strategic consulting)—we are obliged to maintain confidentiality about all client-related facts and assessments we become aware of. We may only share information about you if required by legal provisions, if you have given your consent, or if we are authorized to provide such information.</p> <p>Under these conditions, recipients of personal data may include:</p> <p>Public authorities and institutions (e.g., the Federal Financial Supervisory Authority (BaFin), tax authorities) if there is a legal or regulatory obligation;</p> <p>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 bank, custodian bank);</p> <p>Tax consultants and auditing firms.</p> <p>Other data recipients may include entities for which you have given us your consent to transfer data.</p> <p>In special cases, it may be necessary for your data to be processed across the entire group. Data processing within the Kontora Group occurs only if there is a legal basis for it. This is the case when other companies within the Kontora Group act as processors on our behalf (Art. 28 GDPR), when processing is required to fulfill a contract with you (see Art. 6 (1) sentence 1 lit. b GDPR), when you have given us consent to process your personal data for such purposes (e.g., sharing of data) (see Art. 6 (1) sentence 1 lit. a GDPR), when there is a legal obligation to share data (Art. 6 (1) sentence 1 lit. c GDPR), or if there is a legitimate interest pursuant to Art. 6 (1) lit. f GDPR.</p>
4.1. Use of Artificial Intelligence	<p>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.</p> <p>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.</p>
5. How long will my data be stored? 	<p>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.</p> <p>If we no longer need your data for the purposes described above, it will only be retained for the applicable statutory retention period and will not be processed for other purposes. This also includes the initiation and execution of contracts.</p> <p>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).</p>



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	<p>These require us to store data for two to ten years.</p> <p>In addition, the retention period is also based on the statutory limitation periods, which under Sections 195 ff. of the German Civil Code (BGB) can be up to thirty years, with the regular limitation period being three years.</p>
<p>6. Will data be transferred to a third country or an international organization?</p> 	<p>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.</p>
<p>7. What are my data protection rights?</p> 	<p>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), Right to data portability (Art. 20).</p> <p>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).</p> <p>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 those data to another controller or have them transmitted.</p> <p>Finally, you have the right to lodge a complaint with a supervisory authority (Art. 77 GDPR).</p>
<p>8. Am I obliged to provide data?</p> 	<p>As part of our business relationship, you only need to provide the personal data necessary to start and carry out the relationship or which we are legally required to collect. Without this data, we generally cannot conclude or fulfill a contract with you.</p> <p>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 § 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.</p>
<p>9. Is there automated decision-making in individual cases?</p> 	<p>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.</p>
<p>10. Will my data be used for profiling (scoring)?</p>	<p>We do not use your data for scoring or profiling, nor do we use third-party sources to profile you.</p>



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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 for 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