

PRIVACY POLICY

01.12.2018 Version

At Rheingold Edelmetall AG, Schliessa 16, 9495 Triesen, Liechtenstein, the protection of personal data is given top priority. The collection of personal data by Rheingold Edelmetall AG is done in accordance with the statutory provisions of the European General Data Protection Regulation (GDPR) and with national legislation currently in force. Compliance with statutory provisions governing data protection and data security is given as far as we are concerned.

Rheingold Edelmetall AG is pleased to provide you hereafter with information pursuant to Article 12 et seq. GDPR about the collection of personal data, the purposes of the processing and the rights which you have under the GDPR. Since the type of data processing depends on the agreed services to be provided, not all indications and information shall necessarily fully apply to you. Where they are legal persons, contractual and business partners are asked to bring this privacy policy to the attention of the persons concerned (e.g. firms' executive bodies and staff).

A. Data controller and point of contact:

Rheingold Edelmetall AG

Fritz Diegelmann

Schliessa 16

9495 Triesen

Liechtenstein

Email: info@rheingoldag.com

Telephone number: + 423 392 35 15

B. Your rights

1.1. You have the following rights with regard to any personal data concerning you that we hold:

- Right to information,
- Right to rectification or erasure,
- Right to restriction of processing,
- Right to object to processing,
- Right to data portability.

1.2. If you have given your consent to the processing of your data, you may withdraw this at any time. The withdrawal should be made informally by writing to the business address of Rheingold Edelmetall AG at, Schliessa 16, 9495 Triesen, Liechtenstein.

1.3. If we have based the processing of your personal data on the weighing of interests, you can object to the processing. This is the case where the processing is notably not required for the performance of a contract with you. Should you exercise such a right to object, we would ask you to set out the reasons why we should not process your personal data as we have done. Where your objection is well-founded, we shall look into the facts and circumstances and either cease the data processing, respectively adapt it, or demonstrate to you compelling, legitimate grounds for us to continue with the processing.

1.4. If you believe that the processing of your data breaches data protection law currently in force or somehow otherwise infringes your rights under data protection law, you shall have the right to lodge a complaint with the supervisory authority. In Liechtenstein, this is the Datenschutzstelle [data protection authority], Städtle 38, 9490 Vaduz, Liechtenstein.

C. Collection, processing and use of personal data:

1. Which categories of personal data are collected?

We might collect the following categories of personal data on you:

- (a) name, contact details, home and/or business address, email address, telephone number, fax number, proof of identity (e.g. identification data), nationality, authentication data (e.g. specimen signature);
- (b) identity and biographical information, including nationality, date of birth, tax return details, passport details, place of residence, civil status, current and former occupation, together with further, relevant information required to provide our services and complete our assignment;
- (c) information on your net asset position such as, for example, income, outgo, assets and debts, information on the source of the assets, the bank account and other information required for processing the payment and combating fraud and money-laundering (e.g. via a World Check enquiry);

2. How are your personal data collected?

2.1. Rheingold Edelmetall AG processes personal data that we receive from customers or third parties (e.g. intermediaries, collaboration partners, etc.) through our business dealings with them.

PRIVACY POLICY

01.12.2018 Version

Publicly available sources (e.g. companies' registers, media, etc.) may moreover provide personal data, which is then processed by us.

3. What is the basis for processing your personal data and how are these data used?

3.1. We use your personal data to:

- (a) submit a quotation to you in relation to the services to be provided and assignments to be performed by us (including the completion of background checks);
- (b) ensure that we provide our services and perform our assignments (including any related consultancy activities) and that we maintain industry standards;
- (c) look after and administer the customer relationship (including billing) and for reasons of documentation;
- (d) exercise and defend our lawful rights;
- (e) observe statutory and regulatory obligations such as any duties of care pursuant to SPG [Due Diligence Act] and/or SPV [Due Diligence Ordinance] and other legislation serving to combat money laundering and the funding of terrorism, data protection laws, duties of disclosure for the purposes of tax law and/or to assist investigations by the police and/or any other relevant competent authority (justified in conducting such an investigation by corresponding legislation) and to comply with court injunctions and court orders;
- (f) to ensure the security of our system and our communications;
- (g) for general safety reasons and to guarantee the safety of our staff and visitors;
- (h) for all other reasons for which you provide us with personal data.

3.2. We process your personal data for the aforementioned reasons, provided one (or more) of the following legitimate reasons applies:

- (a) processing is necessary for the performance of the contractual

relationship with the customer;

- (b) processing is necessary to ensure that we can comply with our legal obligations;
- (c) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us;
- (d) processing is necessary to safeguard our legitimate interests (including business development), except where such interests are overridden by your legitimate interests (e.g. a fundamental right); and/or
- (e) you have expressly consented to the use of the data.

4. With whom may we share your personal data?

4.1. Your personal data may be shared with:

- (a) businesses with which Rheingold Edelmetall AG is in a relationship of cooperation;
- (b) third parties who support us in the provision of our services and performance of our assignments, such as for example lawyers, accounting firms, logistics, telecommunications and IT providers, and other consultants, translators, consultancy, distribution or marketing firms, or collections and/or messenger services;
- (c) intermediaries whom we introduce to you;
- (d) third party providers who have business dealings with us, as well as service providers for anti-money-laundering and background checks services, who perform data processing tasks on our behalf, banks and insurance companies;
- (e) public bodies, institutions, authorities, courts in connection with meeting contractual and statutory obligations and safeguarding contractual and statutory rights.

5. Transfer of data abroad and/or to international organisations:

- 5.1. A data transfer to countries outside the EEA (third countries)

PRIVACY POLICY

01.12.2018 Version

shall take place in principle only if this is necessary for the performance of the contract, if it is prescribed by law (e.g. combating money laundering, the funding of terrorism and other criminal acts) or if you have given us your consent. A transfer shall however only be made to third countries that are included within the scope of the Commission's adequacy decision as related to the level of data protection, i.e. in compliance with the European level of data protection.

6. For how long will your personal data be stored?

- 6.1. Your personal data will be stored for as long as is necessary to meet the purposes set out in this privacy policy.
- 6.2. In some cases, this signifies that we shall have to store your personal data for the same period of time as your documents or a copy of your documents. Usually, this is a period of no more than 10 years from the conclusion of the relevant matter.
- 6.3. The storage of your data for a period longer than the period set out above may be appropriate, e.g. for the exercise or defence of our statutory rights. If there is no lawful ground for storage, we shall erase your personal data or, in some cases, anonymise the data.

7. Statutory or contractual obligation to provide data:

- 7.1. Personal data are necessary for conclusion of the contract. For this reason, you must provide the personal data that are required to permit us to initiate and implement the customer relationship and meet the related contractual obligations, or that we are statutorily obliged to collect. If the customer does not provide required personal data, Rheingold Edelmetall AG cannot enter any customer relationship or must, at best, terminate an existing customer relationship. We are accordingly bound by specific statutory provisions, such as for example the Due Diligence Act, to obtain certain personal data, information and documents from you before initiating the customer relationship and in the course of the same.

D. Website:

1. Visiting the website:

- 1.1. Where you use the website for information purposes only or merely view the same, i.e. if you do not register or otherwise provide us with information, we do not in principle collect any personal data. The following personal data may however be stored and processed as the result of your browser, which is working in the background, transferring such data to our server. These data are required for technical reasons by us in order to display our homepage to you and to ensure stability and security:

- IP address
- Date and time of the enquiry
- Time zone offset from Greenwich Mean Time (GMT)
- Content of the request (specific page)
- Access status, status code from the server response
- Volume of data in each case transferred from the server response
- Website from which the request originates
- Browser
- Operating software and interface
- Browser's user agent (including browser software (incl. version), operating system (incl. version), language, device, etc.)

Should errors occur on the main page, the server stores these in a so called error log, together with the date, IP address, page and type of error.

- 1.2. In addition to the aforementioned data, cookies will be stored on your computer whenever you use our homepage. Cookies are small text files that are assigned to the browser used by you and stored on your hard drive; this allows certain information to be passed on to the site setting the cookie (in this case, us). Cookies cannot execute programmes or transfer viruses to your computer. Cookies do not cause any harm, but rather serve to make our website more user-friendly and effective.

2. Use of cookies:

- a) Our website uses the following types of cookies, the scope and functionality of which is as set out below:
 - Transient cookies (cf. b)
 - Persistent cookies (cf. c).

PRIVACY POLICY

01.12.2018 Version

- b) Transient cookies are automatically deleted when you close the browser. They include notably session cookies. These store a so-called session ID, which can be used to assign various enquiries from your browser to the joint session. They make it possible to recognise your computer when you return to our homepage. Session cookies are deleted when you log out or close the browser.
- c) Persistent cookies are automatically deleted after a given length of time, which can vary depending on the cookie. You can delete cookies at any time in your browser's security settings.
- d) You can configure your browser settings as you wish, e.g. to refuse to accept third-party cookies or all cookies. Please note that you may then not be able to use all the functions of this website.
- e) We set cookies so that we can identify you on subsequent visits if you have a user account with us. Otherwise you will need to log in again for each visit.
- f) We also use HTML 5 storage objects, which are stored on your device. These objects store the necessary data regardless of the browser you are using and have no automatic expiry date. You can prevent the use of HTML 5 storage objects by placing your browser in private mode. We also recommend manually deleting your cookies and browser history on a regular basis.
- 2.1. Article 6, para. 1, sub-para. 1, point f, of the GDPR forms the legal basis for the above-mentioned data processing.
- **Web analysis**
- 2.2. Our website uses features of the web analysis service Google Analytics. To this end, cookies (cf. subsection 2.1) are used via JavaScript, and these allow an analysis of the use of the website (<https://www.rheingold-edelmetall.com>) by you. The information generated by the cookie about your use of this website is usually transmitted to the Google server in the USA and stored there. If, however, IP anonymization has been activated on this website, Google will shorten your IP address within Member States of the EU or in other states party to the Agreement on the European Economic Area prior to transmission to the USA. Only in exceptional cases is the full IP address sent to a Google server in the USA and shortened there. Google will use this information on behalf of the operator of this website to evaluate your use of the homepage, to compile reports on homepage activity and to provide the homepage operator with other services relating to homepage and Internet use.
- 2.3. The IP address transmitted by your browser as part of Google Analytics will not be merged with any other data held by Google.
- 2.4. You can prevent the cookies being stored by selecting the appropriate settings in your browser. However, we would point out that doing so may mean you will not be able to enjoy the full functionality of this website. You can also prevent the data generated by cookies about your use of the homepage (incl. your IP address) from being passed to Google, and the processing of the data, by downloading and installing the browser plugin available at the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>.
- 2.5. We use Google Analytics for analysing the use of and regularly improving our website. The statistics obtained allow us to improve the content offered by us and to make it more interesting for you as a user. For those exceptional cases in which personal data are transferred to the USA, Google has agreed to be subject to the EU-US Privacy Shield, <https://www.privacy-shield.gov/EU-US-Framework>. The legal basis for the use of Google Analytics is our legitimate interests in the statistical analysis of user behaviour for optimisation and marketing purposes pursuant to Article 6, para. 1, sub-para. 1, point f, GDPR.
- 2.6. Information on the third party provider: Google Dublin, Google Ireland, Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: + 353 (1) 436 1001. User terms and conditions: <http://www.google.com/analytics/terms/de.html>, data protection overview: <http://google.com/intl/de/analytics/learn/privacy.html> and privacy policy: <http://www.google.de/intl/de/policies/privacy>.
- **Google Maps**
- 2.7. Our website uses Google Maps to display interactive maps directly in the website, thus making it convenient for you to use the map function.

PRIVACY POLICY

01.12.2018 Version

- 2.8. By using this website, you consent to the collection, processing and use of the data collected by Google, its representatives or third party providers.
- 2.9. When you visit the website, Google receives information that you have accessed from the specific page of our website. Additionally, the data referred to under section 1 are transmitted. This occurs regardless of whether Google makes available a user account, through which you are logged in, or whether no user account exists. When you are logged into Google, your data will be assigned directly to your account. If you do not wish the data to be assigned to your Google profile, you must log out of activating the button. Google stores your data as a user profile and uses that data for advertising and market research purposes and/or for the needs-based design of its website. Such an analysis is done in particular (even for users who are not logged in) to provide needs-based advertising and to inform other users of the social network about your activities on our website. You have a right to object to the creation of these user profiles, albeit that you need to contact Google to exercise such rights.
- 2.10. Further information on the purpose and scope of the data collection and processing by the plugin provider can be found in the provider's privacy policy. Further information about your rights in this regard and about the options for adjusting your settings to protect your privacy can also be found here: <http://www.google.de/intl/de/policies/policy>. Google also processes your personal data in the USA and has agreed to be subject to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.
- **Web fonts (Google Web Fonts and web fonts from fonts.com)**
- 2.11. To ensure that fonts used on this website are uniform, our website uses so-called web fonts provided by Google and fonts.com. When you access a website, your browser loads the required web fonts into your browser cache to correctly display text and fonts.
- 2.12. To do this, the browser you use has to establish a connection with the servers of Google and fonts.com. This alerts Google and fonts.com (Monotype GmbH and affiliated undertakings) to the fact that your IP address was used to access our website.

The use of web fonts is based on our interest in presenting our online content in a uniform and appealing way. This constitutes a legitimate interest pursuant to Article 6, para. 1, point f, GDPR. If your browser does not support web fonts, a standard font installed on your computer will be used.

- 2.13. Further information on Google Web Fonts can be found at <https://developers.google.com/fonts/faq> and in Google's privacy policy: <https://www.google.com/policies/privacy/>. Further information on the web fonts of fonts.com can be found at <https://www.fonts.com/info/legal> and in the privacy policy of fonts.com: <https://www.fonts.com/info/legal/privacy/> and in Monotype GmbH's privacy policy: <https://www.monotype.com/legal/privacy-policy/>.

- **jQuery**

- 2.14. Our website uses the javascript extension jQuery, which is downloaded by the website code.jquery.com. In this case, programme libraries are accessed by StackPath servers. When you access a website, your browser loads the required programme libraries into your browser cache.
- 2.15. To do this, the browser you use has to establish a connection with the servers of StackPath located in the USA. The use of jQuery is based on our interest in presenting our online content in an optimised and appealing way. This constitutes a legitimate interest pursuant to Article 6, para. 1, point f, GDPR.
- 2.16. Further information about jQuery can be found at www.jquery.com and in the data protection regulations of StackPath www.stackpath.com/legal/privacy-statement/.

3. Other functions and content offered by our website

- 3.1. In addition to the use of our website purely for informational purposes, we offer various services, which you may be interested in taking up. For this, you must as a rule provide additional personal data, which we shall use to provide the respective services and to which the data processing principles set out below shall apply.

- **Contact**

- 3.2. Our website includes a contact form, which can

PRIVACY POLICY

01.12.2018 Version

be used to contact us electronically. If you take up this option, the data entered on the form, and other data, will be transmitted to us and stored. This data includes:

- Surname
- First name
- Email address
- Telephone number
- Enquiry (in writing)
- Date and time of the enquiry
- IP address

3.3. Even if you contact us by email (info@rheingoldag.com), we shall store the data provided by you in order to process the enquiry and for the event of any follow-up questions, and this up until your withdrawal of consent.

3.4. We shall erase the data collected in connection with this once the storage of such data is no longer required, or if we are subject to statutory obligations to keep records, we shall restrict the processing of such data.

3.5. Data shall be exchanged with any partner companies referred to on our website only if the statutory requirements have been met.

- **Creation of a user account**

3.6. Whenever a user account is created (registration), the following data, which must inter alia be provided during the registration process, are processed:

- First name and surname
- Email address
- Telephone number
- Fax number
- Password
- Date and time of registration
- Date and time of last login
- Orders placed
- Contents of basket

3.7. Registration offers you several benefits (e.g. quicker processing of orders in Rheingold Edelmetall AG's online shop, the storage of several delivery addresses, tracking earlier orders, use of the

virtual portfolio, etc). To ensure that we can provide these benefits, which are associated with registration, we are required to collect this data.

3.8. If you visit our website as a registered customer, we shall collect on each visit to the website, in addition to the data referred to in section 1., the following data:

- Email address
- Password

- **Webshop**

3.9. To order and/or buy goods from the online shop <https://www.rheingold-edelmetall.com>, the following data must be disclosed for the purposes of conclusion of the contract:

- First name
- Surname
- Business name
- Address
- Email address
- Telephone number

3.10. The data collected are required for the order and are processed for such purposes. If such data are not provided, it is not possible to order the goods from the online shop. Rheingold Edelmetall AG stores such contractual data automatically in a customer database. The period for which such data are stored is generally 10 years but this may, on account of statutory obligations to keep records or for the preservation of evidence, correspond to statutory limitation periods and therefore be extended to the same.

3.11. All data that does not have to be retained by reason of statutory requirements, e.g. requirements under company law and tax law, will be erased on completion of the ordering process.

3.12. The data collected when goods are ordered from the online shop will be used solely for the proper processing of the order.

E. **External links**

1.1. Our website contains links to other websites. We do not assu-

PRIVACY POLICY

01.12.2018 Version

me any liability for external links. Despite careful monitoring and scrutiny, we have no control over the content and operation of such linked websites.

F. Automated decision-making (including profiling)

- 1.1. We do not in principle use any fully automated decision-making process pursuant to Article 22 GDPR for the initiation and implementation of the customer relationship. Should we implement this procedure where necessary in individual cases, we shall inform you of this separately, should there be a statutory obligation to do so.

G. Data security

- 1.1. We have appropriate technical and organisational measures to protect your personal data from being unlawfully or inadvertently read, processed, used, forged, lost or destroyed.
- 1.2. Despite all our efforts, however, we cannot rule out the possibility that the information that you have sent to us by digital means might be read or used by others. Please note that unencrypted emails that you send online are not adequately protected against unlawful third party access. We would therefore recommend that you send confidential information to us by post.

H. Changes to our privacy policy

- 1.1. In case of a change to our legal status and/or to a service, product or user service, we shall where necessary adapt the privacy policy accordingly. Should the change also affect the consent given by you, changes shall only be made once you have given your prior approval.