

Privacy policy notice

Roesch Investment Advisory & Management GmbH (**RIAM**) may process personal data of its business contacts ("**you**"). Where this notice says "**we**", "**us**" or "**our**", we are referring to **RIAM**. This privacy policy notice explains how and why your personal data is processed by RIAM and also contains information about your rights in relation to your personal data.

1. CONTROLLER

We act as a "controller" in respect of your personal data. In simple terms, this means that we "control" the personal data that you provide – including making sure that it is kept secure.

2. COLLECTION, STORAGE AND USE OF YOUR PERSONAL DATA

We may collect and process the following information about you:

- Information that you give us: This is information about you that you give us by providing your business card (or similar) to us or filling in forms on our website or activating contact email-links (or other forms that we ask you to complete) or corresponding with us by telephone, post, email or otherwise. It may include, for example, your name, company, business and/or private address, email address and telephone numbers as well as information about your business relationship with RIAM, your professional role, personal background and interests. We process your personal data on the basis of a legitimate interest in accordance with Art. 6 Par. 1 f of the EU General Data Protection Regulation (GDPR). We believe that our business relationship with you and/or your company provides for a legitimate interest to process your personal data as set out herein.
- Information that our website and other systems collect about you: When you visit our website www.riam-partners.com or www.riam-partners.de, the device that you use to access the page automatically transmits log data (connection data) to the servers of our internet service provider. These information are saved temporarily in a so-called log data. Following information will be automatically transmitted and saved until its automatic deletion:
 - the IP address of the device that you use to access the website,
 - the date and time of your visit to our website,
 - name and URL of called-up files,
 - the website from which the access to our website has been requested (referrer-URL),
 - the type of browser you are using, the website you have visited beforehand, your system configuration as well as the name of your access provider.

Those information will be processed to:

- Ensure a swift access and connection to our website,
- Ensure an easy navigation on our website,
- Analyse the security and stability of the IT-systems,
- for other general administrative purposes.

Personal data processing is based on Art. 6 Par. 1 f GDPR. Our legitimate interest is based on the above listed purposes for data collection. We will never use the collected personal data to get information on you as an individual.

- We may also collect some information from other sources, for example If we have a business relationship with the organisation that you represent, your colleagues or other business contacts may give us information about you such as your contact details or details of your role in the business relationship.

3. COOKIES

Our internet service provider uses cookies in various areas on our website. Cookies are small identifiers that his server stores on the device that you use to access our website. Cookies do not damage your device, don't contain viruses, trojans or other malwares. They store information specific to your device. This doesn't mean that our internet service provider obtains immediate knowledge about your identity. The use of cookies allows for more efficient and better use of our website.

Session cookies, which purpose is to recollect your previous access to specific pages of our website, are deleted when you close your web browser. Temporary cookies are also used to improve the usability and navigation on our website. They are stored on your device for a specific set time. They enable the IT-systems to recollect your last access to our website and retrieve automatically the specific settings and data input you had already provided. Permanent cookies remain on your device until they are no longer needed to achieve their purpose and are deleted.

In addition, cookies are also used, among other things, to collect statistical information about our website, for example about the number of visitors or your last access to it. Those cookies are deleted automatically after a specific set time.

The personal data processed by cookies for the purposes listed above is to protect our legitimate interest as well as the one of third parties based on Art. 6 Par. 1 f GDPR. You can prevent the creation of cookies at any time by means of an appropriate setting of your Internet browser used and thus permanently object the creation of cookies. Furthermore, cookies that have already been created can be deleted at any time via an Internet browser or other software programs. This is possible in all common Internet browsers. If you deactivate the creation of cookies in the Internet browser you are using, not all functions of our website may be fully usable.

4. ANALYSIS TOOLS AND SOCIAL MEDIA

On our website there are no analysis tools such as google analytics, matomo nor social media services plugins (Facebook, Instagram, Twitter, etc...).

5. USE, SHARING AND DELETION OF YOUR PERSONAL DATA

We may use your information to operate, manage, develop and promote our business and, in particular, our relationship with the organisation you represent (if any) and related transactions or advisory services.

We will not share your personal data with third parties, except:

- if you have provided us with your express consent according to Art. 6 Par. 1 a GDPR,
- If the transmission of personal data is necessary for the establishment, exercise or defence of legal claims except where such interests are overridden by your superior interests or fundamental rights and freedoms according to Art. 6 Par. 1 f GDPR
- If the processing is necessary for compliance with a legal obligation in accordance with Art. 6 Par. 1 c GDPR,
- If the processing of personal data is required to fulfil a contract in accordance with Art. 6 Par. 1 b GDPR.

We will delete the information that we hold about you when we no longer need it. We will process your personal data throughout our business relationship with you or your organisation. However, we may retain some limited information about you even when we know that you have left the organisation that you currently represent, so that we can maintain a continuous relationship with you if and when we are in contact with you again, once you have joined a different organisation.

6. YOUR RIGHTS

Subject to applicable data privacy laws, you have the following rights regarding the processing of your personal data:

- You have the right to obtain confirmation as to whether or not personal data concerning you are being processed and, where this is the case, access to the personal data and information (Art. 15 GDPR).
- You have the right to rectification of personal data concerning you (Art. 16 GDPR).
- You have the right to obtain the erasure of personal data concerning you in accordance with Art. 17 GDPR ("right to be forgotten").
- You have the right to obtain restriction of processing (Art. 18 GDPR).
- You have the right to data portability in accordance with Art. 20 GDPR.

- You have the right not to be subject to a decision based solely on automated processing, including profiling (Art. 21 GDPR).
- You have the right to object to the processing of personal data concerning you (Art. 21 GDPR), among others:
 - You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you, which is based on Art. 6 Par. 1 e GDPR (data processing for purposes of public interest) or Art. 6 Par. 1 f GDPR (data processing for purposes of prevailing legitimate interests pursued by us). This also applies to profiling based on these provisions.
 - If you object, we shall no longer process the personal data, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of you, or for the establishment, exercise or defence of legal claims.
- You have the right in accordance with Art. 77 III GDPR to withdraw your express consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal but only for the time after the withdrawal of your consent.
- You have the right in accordance to Art. 77 GDPR to contact a regulating data protection body in your country, where you live or work, or the location where the data protection issue arose.

7. DATA SAFETY

Our website visit is secured by our internet service provider who uses the common SSL (Secure Socket Layer) encryption process in conjunction with the highest encryption level supported by your browser. In general, this is a 256-bit encryption. If your browser does not support the 256-bit encryption, our internet service provider alternatively uses the 128-bit v3 technology instead.

Whether a single page of our website is encrypted is shown by the representation of a closed key or lock icon in the lower status bar of your browser. Additionally, our internet service provider uses appropriate technical and organizational security measures to protect your data against accidental or intentional manipulation, partial or total loss, destruction or against unauthorized access by third parties.

These security measures are continuously being improved in line with technological developments.

8. UPDATE AND CHANGE OF THIS PRIVACY POLICY

This privacy policy notice is currently valid based on the current legal status as of May 2018. As a result of the further development of our website and services or as a result of changes in legal or regulatory requirements, it may become necessary in the future to update this privacy policy.

The update and current privacy policy can be viewed and printed on our website at any time.

9. CONTACT

Please contact us if you have any questions about this privacy policy notice or the information we hold about you. Contact us by email at contact@riam-partners.com or in writing using the following address:

Data Protection Officer: Philippe Roesch, RIAM GmbH, Schumannstrasse 64, 60325 Frankfurt am Main.