

Privacy Policy

of Inmann Stelzl & Partner Attorneys at Law Partnership

The protection of personal data is our highest priority at Inmann Stelzl & Partner Attorneys at Law Partnership (“we” or “us”). Due to our professional duty to ensure confidentiality, we are obliged to maintain the utmost secrecy in every aspect of our work and take the protection of your personal data seriously.

We therefore always process your personal data in accordance with the statutory provisions of the European General Data Protection Regulation (“GDPR”), the Liechtenstein Data Protection Act (“DSG”) and other applicable laws.

I. Contact details

a. Controller

The controller for the processing of your data within the meaning of the GDPR and the DSG is:

Inmann Stelzl & Partner Attorneys at Law Partnership

Eschner Strasse 93

9487 Gamprin-Bendern, Liechtenstein

+423 3999400

office@isp.law

www.isp.law

b. Data protection officer

If you have any questions and/or concerns about our data protection, please contact our data protection officer:

Christian Inmann

Eschner Strasse 93

9487 Gamprin-Bendern, Liechtenstein

+423 399 94 00

office@isp.law

www.isp.law

c. Supervisory authority

The competent authority for data protection violations and data protection concerns in Liechtenstein is:

Datenschutzstelle Fürstentum Liechtenstein

Städtle 38

9490 Vaduz, Liechtenstein

+423 236 60 90

info.dss@llv.li

www.datenschutzstelle.li

II. Visitors to our Website

a. Which data do we process?

Each time our website (www.isp.law) is accessed, our system automatically collects the following personal data and information from the computer system of the accessing computer:

- Device category (desktop, mobile and tablet), platform (web, iOS app or Android app), browser and screen resolution you used;
- Your internet service provider;
- Your IP address;
- Date and time of access;
- Internet page of origin.

If you have agreed to the use of Google Analytics, the following personal data and information will also be processed:

- Where you visited our website from (e.g. originating website, search engine including the term you searched for, social media platform, paid search or campaign, etc.);
- Whether or not you belong to a target group;
- What you have done on our website and what events were triggered by your actions (e.g. page views, user engagement, scrolling behaviour, clicks, etc.);
- Conversions (e.g. whether you have made contact with us);
- Gender, age and interests, if an assignment is possible.

In addition to simply accessing our website, we also offer you the option of contacting us by e-mail or other electronic message. For this purpose, we process your name and contact details (in particular e-mail address and telephone number).

b. Why do we process your data?

We process your personal data in order to display our website to you, to ensure the stability and security of our website and/or to process your request.

In addition, we process your personal data for static purposes.

c. What is the legal basis for processing your personal data?

We process your personal data when you visit our website to safeguard our legitimate interests (Art. 6 para. 1 lit. f GDPR), namely to ensure the operation, security and optimization of our website.

We process your personal data when you contact us on the basis of your consent (Art. 6 para. 1 lit. a GDPR) and for the performance of a contract (Art. 6 para. 1 lit. b GDPR).

We process your personal data for statistical purposes on the basis of your consent (Art. 6 para. 1 lit. a GDPR). You can revoke this consent at any time.

d. With whom may we share your data?

We only share your personal data with third parties who provide us with technical support, such as our IT service provider.

In addition, we may also share your personal data with third parties (e.g. Google) for statistical purposes on the basis of your consent.

e. Where is your data processed?

We process your personal data in Liechtenstein and the EU (in particular Austria).

Your personal data will not be transferred to recipients in a third country.

If we do (have to) transfer data to a recipient in a third country or an international organization, we will ensure in advance that (a) the third country offers an adequate level of protection for your data on the basis of an adequacy decision by the European Commission and/or (b) the recipient has signed a contract based on standard contractual clauses (SCC) confirmed by the European Commission, which obliges them to protect personal data.

Due to IP anonymization within the member states of the EU and the EEA, your personal data will not be transferred to a third country (e.g. USA) by "Google Analytics".

f. How long will your personal data be stored?

In principle, we only store your personal data for as long as it is necessary for the purposes for which it was collected in accordance with this Privacy Policy.

However, we may be required by law to store certain data for a longer period of time. In this case, we will ensure that your personal data is treated in accordance with this Privacy Policy for the entire period.

g. Cookies

Our website uses cookies.

Cookies are text files that are stored in the internet browser or by the internet browser on your computer system. When you visit our website, a cookie may be stored on your operating system. This cookie contains a characteristic string of characters that enables the browser to be uniquely identified when the website is called up again.

Cookies can be used for various purposes, e.g. to ensure the functionality, security and convenience of online offers and to analyse visitor flows.

Notes on consent: We use cookies in accordance with the statutory provisions. We therefore obtain your prior consent (through the cookie banner), which you can revoke at any time. Consent is not required if the storage and reading of information, including cookies, is absolutely necessary.

Information on legal bases under data protection law: We process your personal data with the help of cookies either based on our legitimate interest, namely ensuring the operation, security and optimization of our website, or with your consent.

Storage duration: With regard to the storage duration, a distinction is made between the following types of cookies:

- Temporary cookies (also: session cookies): Temporary cookies are deleted at the latest after you leave our website.
- Permanent cookies: Permanent cookies remain stored even after you close our website. For example, the login status can be saved and/or preferred content can be displayed directly when you visit our website again. Your data collected with the help of cookies can also be used to measure reach. Unless we provide you with explicit information on the type and storage duration of cookies (e.g. when obtaining consent), you should assume that cookies are permanent and can be stored for up to two years.

General information on revocation and objection (opt-out): You can revoke the consent you have given at any time and also object to the processing in accordance with the legal requirements in Art 21 GDPR. You can also declare your objection using your browser settings.

Processing of cookie data based on consent: We use a cookie consent management procedure. The declaration of consent is stored so that it does not have to be requested again and the consent can be proven in accordance with the legal obligation. It can be stored on the server and/or in a cookie (so-called opt-in cookie or with the help of comparable technologies) to be able to assign the consent to a user or their device. In this case, a pseudonymous user identifier.

h. Downloads

We do not require any personal data from you so that you can download files from our website.

i. External links

Our website contains links to other sites (e.g. LinkedIn). We assume no liability for external links. Despite careful monitoring and control, we have no control over the content and operation of these linked websites.

j. Google Analytics

Our website uses the “Google Analytics” service, which is offered by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, to analyse website usage by users. The service uses “cookies” – text files that are stored on your end device. The information collected by the cookies can also be sent to a Google server in a third country (e.g. USA) and stored there.

IP anonymization is used on this website. Your IP address is truncated within the member states of the EU and the EEA. This truncation eliminates the personal reference of your IP address. As part of the data processing agreement that we have concluded with Google, Google uses the information collected to analyse website usage and website activity and provides services related to internet usage, but not based on personal data.

You have the option of preventing the storage of cookies on your device by making the appropriate settings in your browser. There is no guarantee that you will be able to access all functions of this website without restrictions if your browser does not allow cookies.

You can also use a browser plugin to prevent the information collected by cookies (including your IP address) from being sent to Google Inc. and used by Google Inc. The following link will take you to the corresponding plugin: <https://tools.google.com/dlpage/gaoptout?hl=de>.

Here you can find further information on the use of data by Google:
<https://support.google.com/analytics/answer/6004245?hl=de>

Alternatively, you can prevent Google Analytics from collecting data about you within this website by making the appropriate settings in the cookie banner. This will download an “opt-out cookie”. Your browser must therefore allow the storage of cookies. If you delete your cookies regularly, you will need to click on the link again each time you visit this website.

III. Clients and business partners

a. Which data do we process?

As part of the business relationship with our clients and business partners, we process the following personal data:

- Personal details and contact data (in particular surname, first name, date of birth, address, telephone number, e-mail address);
- Information regarding the financial situation such as income, expenses, assets and debts, information regarding the origin of the assets, the bank account and other information necessary for processing the payment and combating fraud;
- Information for our advisory activities and for the assertion and defence of your rights within the scope of our contractual relationship.

b. How we obtain your personal data?

We only process your personal data that you have provided to us and/or that we receive from publicly accessible sources. The data is collected either directly by us or by third parties (service providers).

c. Why do we process your data?

We use your personal data:

- To enter into a contractual relationship with you (including conducting background checks);
- to carry out our advisory activities (including legal research and related advisory activities);
- for the exercise and defense of our legal rights;
- for documentation purposes;
- for any other reason for which you provide us with personal data.

d. What is the legal basis for processing your personal data?

We process your personal data as part of the business relationship to fulfill a contract (Art 6 para. 1 lit. b GDPR), to fulfill our legal obligation (Art 6 para. 1 lit. c GDPR), namely our professional obligations under the RAG and other laws, in each case in the applicable version and/or to safeguard our legitimate interests (Art 6 para. 1 lit. f GDPR).

e. With whom may we share your data?

We only share your personal data with third parties who support us in our advisory activities, such as lawyers, IT service provider, service providers for anti-money laundering and background checks who carry out data processing for us, banks and insurance companies, courts and other authorities in connection with the exercise of the defense of legal rights and the provision of our advisory activities.

f. Where is your data processed?

We process your personal data in Liechtenstein and the EU.

Your personal data will not be transferred to recipients in a third country.

g. How long will your personal data be stored?

We will only store your personal data for as long as is necessary for the purposes for which it was collected in accordance with this Privacy Policy.

In some cases, this means that we may need to store your personal data for the same length of time as your documents or a copy of your documents. Normally, this is a period of no more than 10 years from the end of the relevant matter or mandate for legal advice.

Storing your data for longer than the above-mentioned period may be appropriate, e.g. for the exercise or defense of our legal rights. If there is no longer a legal reason for storage, we will delete or, in some cases, anonymize your personal data.

IV. **Job Applicants**

a. Which data do we process?

We process the following personal data as part of the application process:

- name, age, gender, nationality, date and place of birth, marital status, passport details, hobbies, private and/or business address, e-mail address and telephone number, current and former job(s), functions, working hours, memberships and extra-duty mandates;
- image data (application photo);
- data in the cover letter;
- data in certificates, training certificates, references and confirmations of employment;
- information from the job interview such as salary expectations, type of desired employment, starting date;
- information from correspondence during the application process;
- data on references; and/or
- other relevant information for the assessment or justification of an employment or service relationship.

b. How we obtain your personal data?

We only process your personal data that you have provided to us and/or that we have obtained from publicly accessible sources and/or former employers/information providers. The data is collected either directly by us or by third parties (service providers).

c. What is the legal basis for processing your personal data?

We process your personal data as part of the application process on the basis of your express consent (Art. 6 para. 1 lit. a GDPR), to fulfill a contract (Art. 6 para. 1 lit. b GDPR), to fulfill our legal obligation (Art. 6 para. 1 lit. c GDPR) and/or to protect our legitimate interests (Art. 6 para. 1 lit. f GDPR).

d. With whom may we share your data?

We only share your personal data with internal departments other than those responsible for the application process, which require the data as part of the application process and/or our IT service provider, for the electronic storage of your application documents.

e. Where is your data processed?

We process your personal data in Liechtenstein and the EU.

Your personal data will not be transferred to recipients in a third country.

f. How long will your personal data be stored?

After completion of the application process, we will store your personal data for a further two months in order to be able to defend, substantiate or assert any legal claims. If you are hired, we will process and store your personal data for the duration of your employment relationship in accordance with this Privacy Policy.

V. Common provisions

a. What rights do you have?

You have the following rights vis-à-vis us with regard to your personal data:

- right to information;
- right to rectification or deletion;
- right to restriction of processing;
- right to object to processing; and
- right to data portability .

If you have consented to the processing of your data, you can revoke this consent at any time. The revocation can be sent informally to the address of Inmann Stelzl & Partner Attorneys at Law Partnership, Eschner Strasse 93, 9487 Gamprin-Bendern, Liechtenstein, or by e-mail: office@isp.law.

When processing your personal data, we try to take all interests into account, but you still have the right to object to the processing. This is particularly the case if the processing is not necessary for the fulfillment of the contract with you. If you object to the processing, please inform us of the reason for your objection. If your revocation is justified, we will examine the situation and either terminate or adapt the data processing or inform you of the legitimate reasons on the basis of which we will continue the data processing.

If you are of the opinion that our data processing violates applicable data protection law or that your personal right to data protection has been violated in any way, you have the right to contact the competent authority (Data Protection Authority for the Principality of Liechtenstein).

b. Data Security

We have taken appropriate technical and organizational precautions to protect your data.

c. Automated Decision Making

We do not use fully- or semi-automated decision making. Our processing activities depend on human involvement.

d. Current Version and Changes to the Privacy Policy

This Privacy Policy is the current version issued in April 2024.

In the event of any change to legislation or a service, product or user service, we will amend the Privacy Policy accordingly. Where the amendment also concerns the consent granted by you, changes only take place after obtaining your prior consent.