

# EBG Capital Ltd Privacy and Cookie Policy

## 1. APPLICABILITY OF THIS PRIVACY AND COOKIE POLICY

The website of EBG Capital Ltd ([www.ebg-capital.com](http://www.ebg-capital.com)) (the "Site") is operated by EBG Capital Ltd, Gerechtigkeitsgasse 31, 8001 Zurich, Switzerland ("We" or "EBG Capital Ltd").

This privacy and cookie policy intends to inform the user ("YOU" or the "User") about the use of Personal Data collected by EBG Capital Ltd using the Site. By using the Site, YOU agree to EBG Capital Ltd's use of YOUR Personal Data as set out in this privacy and cookie policy (the "Privacy and Cookie Policy").

## 2. COLLECTED DATA

EBG Capital Ltd collects the following data from YOUR use of the Site: YOUR browser type and version, general information regarding YOUR operating system and the current date and time (the "Anonymous Data"). The Anonymous Data is used to anonymously analyze the usage of the Site and for anonymous statistical purposes only.

EBG Capital Ltd may further collect the following information: YOUR name, YOUR contact information including email address, demographic information such as zip code, preferences and interests, other information relevant to customer surveys and/or offers, and any other personal information which YOU provide to Us ("Personal Data"). Such information is collected if YOU enter such information into the respective form fields on the Site or by any other means of contact with US.

## 3. USE OF YOUR PERSONAL DATA

EBG Capital Ltd may process YOUR Personal Data on one of the following grounds:

- Performance of a contract or negotiation of a possible future contract;
- To pursue legitimate interests of EBG Capital Ltd; or
- Based upon YOUR consent.

EBG Capital Ltd may use Personal Data YOU have provided in this way for the following purposes: (i) for the provisioning of the services YOU request; e.g. for advertisement services via Our website; (ii) for internal record keeping; (iii) to improve EBG Capital Ltd's products and services; (iv) to periodically send promotional emails about new products, special offers or other information using the email address which YOU have provided; (v) to contact YOU for market research purposes; (vi) for the operation of Our website. EBG Capital Ltd may contact YOU by email, phone, fax or mail. EBG Capital Ltd may further use YOUR Personal Data to customize the Site according to YOUR interests. Please also consider Our use of Google Analytics as described below in more detail.

EBG Capital Ltd works together with external service providers, such as external IT-providers, external consultants, external providers of commercial administration services etc. Such external service providers will perform their services for EBG Capital Ltd in their capacity as data processors, and We will require them to respect applicable data protection rules to the same extent as we do. Additionally, any legal data submission duties shall remain reserved. Please also consider the use of Google Analytics as described below in more detail. Despite that, EBG Capital Ltd will not make YOUR Personal Data available to any third parties unless EBG Capital Ltd has YOUR permission or is required by law to do so.

Please note, that EBG Capital Ltd has no control of what happens to Personal Data which YOU choose to make publicly available via Our website.

We will process YOUR Personal Data mainly in Switzerland. However, Personal Data may also be exported and processed abroad. Such export shall only take place to countries that are known to guarantee data protection standards that are equivalent to those enacted in Switzerland, or in cases where sufficient contractual guarantees are at hand.

#### 4. CONTROL OVER YOUR PERSONAL DATA – YOUR RIGHTS

YOU have the right to request information about what Personal Data EBG Capital Ltd has saved with respect to YOU. YOU may also request that such Personal Data is corrected.

According to applicable law, YOU may have the right to request erasure of YOUR Personal Data. However, Personal Data may not be erased upon request if there are compelling reasons to keep such data stored. Furthermore, according to applicable law YOU may also ask US to restrict the use of YOUR Personal Data for specific purposes. Depending on the data protection regime applicable, YOU may also ask US to provide YOU with the Personal Data made which YOU made available to US, and YOU may also transfer such data to other controllers (right to data portability).

YOU may object to the use of YOUR Personal Data for direct marketing purposes by using the contact details below. Additionally, and insofar as Our processing activity is based upon Our legitimate interests, YOU may also object to the further processing of YOUR Personal Data, if and to the extent that YOU find YOURSELF in a situation that justifies such objection.

If provided for by applicable data protection laws, YOU may lodge a complaint with the competent data protection authorities if YOU are concerned that YOUR Personal Data is not being treated adequately.

If Our processing of YOUR Personal Data is based upon YOUR consent, YOU may withdraw YOUR consent at any time. Please be advised that such withdrawal shall only be effective for future processing activities. Moreover, future processing activities which are based upon other grounds than YOUR implicit or explicit consent shall not be affected by such withdrawal.

#### 5. STORAGE OF YOUR PERSONAL DATA

We will store YOUR Personal Data for as long as it is necessary to fulfil our contractual and legal duties.

#### 6. GOOGLE ANALYTICS

The Site uses analytics software. Currently, the Site uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses Cookies (see below for more information about Cookies).

The information generated by the Cookie about YOUR use of the Site (including YOUR IP address) will be transmitted to and stored by Google on servers in the United States. Google will truncate/anonymize the last octet of the IP address for Member States of the European Union as well as for other parties to the Agreement on the European Economic Area. Only in exceptional cases, the full IP address is sent to and shortened by Google servers in the USA. Google will use this information on behalf of EBG Capital Ltd for the purpose of evaluating YOUR use of the Site, compiling reports on Site activity for EBG Capital Ltd and providing other services relating to Site activity and internet usage to EBG Capital Ltd.

EBG Capital Ltd shall be free to change the analytics software it uses at any time. Such changes will be reflected in this privacy and cookie policy at such time.

#### 7. COOKIES

##### 7.1. In general

A cookie is a small file which asks permission to be placed on YOUR computer's hard drive (hereinafter a "Cookie"). Once YOU agree, the file is added and the Cookie helps analyze web traffic or lets YOU know when YOU visit a particular site. Cookies allow web applications to

respond to YOU as an individual. The web application can tailor its operations to YOUR needs, likes and dislikes by gathering and remembering information about YOUR preferences. To learn more about Cookies, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

EBG Capital Ltd uses traffic log Cookies to identify which pages are being used. This helps EBG Capital Ltd analyze data about web page traffic and improve our Site in order to tailor it to customer needs. EBG Capital Ltd only uses this information for statistical analysis purposes and then the data is removed from the system.

Overall, Cookies help EBG Capital Ltd provide YOU with a better Site, by enabling EBG Capital Ltd to monitor which pages YOU find useful and which YOU do not. A cookie in no way gives EBG Capital Ltd access to YOUR computer or any information about YOU, other than the data YOU choose to share with EBG Capital Ltd. YOU can choose to accept or decline cookies. Most web browsers automatically accept Cookies, but YOU can usually modify YOUR browser setting to decline Cookies if YOU prefer. This may however prevent YOU from taking full advantage of the Site.

## 7.2. Google Analytics Cookies

As stated above, EBG Capital Ltd collects standard internet log information and details of visitor behaviour patterns by using Google Analytics cookies. EBG Capital Ltd does this to improve the Site. This information does not comprise any Personal Data. Data used for analytics purposes may be associated with Personal Data gathered from this Site or otherwise.

For more information about Google Analytics cookies [click here](#).

## 8. SOCIAL MEDIA PLUGINS

EBG Capital Ltd may in future give users the option to share pages of our Site on social networks. Our website therefore may use Facebook, LinkedIn, Instagram, and Twitter plugins.

The Social Media Plugins of the Social Media Providers will allow for special functions which the User might find useful or interesting. Such special functions include, for instance, the possibility to share certain content of the Website with third parties (e.g. by using the share function of Facebook) or to highlight the User's interest in the Website vis-à-vis third parties (e.g. by following the Company through a corresponding function of Twitter).

The User is hereby made aware of the fact that, if such Social Media Plugins are activated, the User's browser automatically creates a connection to the servers of these Social Media Providers. Therefore, the said Social Media Providers may be able to collect data from the User such as the IP address, the surfing patterns etc. even if the User does not use their services or the respective functions and/or the User is logged out of the respective website. If the User is logged in at such websites, the respective Social Media Providers may identify the User by a cookie set in the User's browser and/or the User's IP address, and link the User's visit of the Website to the User's profile with such service. If the User wants to avoid the collection of such data by the Social Media Provider, the User should make sure that he is logged out of the respective website of the Social Media Provider. However, as aforesaid, even when logged out, the Social Media Provider may collect and/or analyse data of the user due to the described implementation of the Social Media Plugin.

We have no influence on which data the Social Media Providers collect and how such data is used by the Social Media Providers.

The Social Media Providers provide information on the purpose and the scope of the collection and usage of data by the User, the User's rights and the corresponding options to safeguard the User's privacy. For more information, please refer to the respective websites of the Social Media Provider.

## 9. AMENDMENT OF THIS PRIVACY AND COOKIE POLICY

We retain the right to amend this Privacy and Cookie Policy at any time. Such amendments will be published on the Site – please regularly check this page for amendments to this Privacy and Cookie Policy.

## 10. CONTACT DETAILS

If YOU have any queries or requests regarding Our treatment of YOUR personal data, please feel free to contact US at: [info@ebg-capital.com](mailto:info@ebg-capital.com).

Our representative for the European Union according to the GDPR is: Francesca Camilla Bruno, E-Mail: [francesca.bruno@ebg-capital.com](mailto:francesca.bruno@ebg-capital.com).