



Online Data Protection Policy

I. Name and Address of the Controller

The controller within the meaning of the General Data Protection Regulation and other national data protection laws of Switzerland and the EU member states as well as of other data protection regulations is:

LENHILL PARTNERS LTD
(hereinafter «LENHILL»)
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Switzerland
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II. General Remarks on Data Processing

1. Extent of the Processing of Personal Data

LENHILL basically processes personal data of the user only to the extent that this is necessary for the provision of a functioning website and of our contents and services. Personal data of the user is generally processed only within their consent. An exception applies in cases where for factual reasons it is not possible to obtain prior consent and the processing of the data is legally permitted.

2. Legal Basis for the Processing of Personal Data

Provided that LENHILL obtains consent for the personal data processing operations from the data subject, art. 6 para. 1 a of the EU Data Protection Regulation (GDPR) forms the legal basis where the processing of personal data is necessary for the performance of a contract to which the data subject is party. This also applies where processing operations are necessary to take steps prior to entering into a contract. Where processing of personal data is necessary for compliance with a legal obligation to which LENHILL as a company is subject, art. 6 para. 1 c GDPR forms the legal basis.

Art. 6 para. 1 d GDPR forms the legal basis where processing is necessary in order to protect the vital interests of the data subject or of another natural person. If processing is necessary for the purposes of the legitimate interests pursued by LENHILL or by a third party, and such interests are not overridden by the interests or fundamental rights and freedoms of the data subject, art. 6 para. 1 f GDPR forms the legal basis for the data processing.

3. Erasing of the Data and Storage Period

The personal data of the data subject will be erased or blocked as soon as the purpose of storage ceases to apply. Storage can continue after this time if required under the statutory storing obligations to which the controller is subject. Blocking or erasing of the data will also take place on the expiry of a storage period prescribed under the above-mentioned norms, unless there is a need for continued storage of the data for the conclusion or fulfillment of a contract.

III. Provision of the Website and Preparation of Log Files

1. Description and Extent of the Data Processing

Every time the LENHILL website is accessed, the system automatically records data and information from the computer system of the accessing computer.



The following data is collected:

- (1) Information about the browser type and the version used
- (2) The operating system of the user
- (3) The internet service provider of the user
- (4) The user's IP address
- (5) Date and time of the access
- (6) Websites from which the user's system reached our website
- (7) Websites which were accessed by the user's system via our website

This data is also stored in the log files of LENHILL's system. This data is not stored with the other personal data of the user.

2. Legal Basis for the Data Processing

Art. 6 para. 1 f GDPR is the legal basis for the temporary storage of the data and log files.

3. Purpose of the Data Processing

The temporary storage by the system of the IP address is necessary in order to enable the website to be delivered to the user's computer. For this purpose, the IP address of the user must continue to be stored for the duration of the session.

The purpose of the storage in log files is to secure the proper functioning of the website. Moreover, the data helps to optimize the website and to ensure that the information technology systems of LENHILL are secure. There is no evaluation of the data for marketing purposes.

These purposes provide the legitimate interest of LENHILL in the data processing according to art. 6 para. 1 f GDPR.

4. Period of Storage

The data is erased as soon as it is no longer necessary for achieving the purpose for which it was collected. In the case of the collection of data for delivering the website, this is the case when the respective session is terminated.

In the case of the storage of data in the log files, this is usually the case after thirty days at the latest but a longer storage time is possible. In this case the user's IP address are erased or alienated, so that it is no longer possible to assign them to the accessing client.

5. Possibilities of Objection and Removal

The recording of the data for the provision of the website and the storage of the data in the log files is essential for the operation of the website. The user has no possibility to object to this.

IV. Use of Cookies

1. Description and Extent of the Data Processing

Cookies are text files which are stored on the internet browser and in the user's computer system by the internet browser. If a user visits a website, a cookie can be stored in the user's operating system. This cookie contains a particular string of characters which makes a clear identification of the browser possible when the website is visited again.

The LENHILL website does not use cookies.



V. Newsletter

1. Description and Extent of the Data Processing

The LENHILL website does not currently offer the possibility of subscribing to a newsletter.

VI. Contact Form and E-Mail Contact

1. Description and Extent of the Data Processing

There is a contact form on the LENHILL website which can be used for making contact electronically. If a user makes use of this possibility, the data entered in the input mask is transmitted to LENHILL and stored. This data is:

- (1) The user's IP address
- (2) Date and time of the registration
- (3) Surname, first name, title
- (4) E-mail address
- (5) Language

The user's consent for the processing of the data is obtained within the framework of sending in the contact form, and attention is drawn to this Data Protection Declaration.

Alternatively, contact can be made via the e-mail address provided by the user. In this case, the user's personal data transmitted with the e-mail is stored.

No data is passed on to third parties in this connection. The data is used exclusively for the preparation of the conversation.

2. Legal Basis for the Data Processing

Art. 6 para. 1 a GDPR is the legal basis for the processing of the data, provided that the user's consent has been obtained.

The legal basis for the processing of the data which is transmitted in the course of sending an e-mail is art. 6 para. 1 f GDPR. If the e-mail contact is aiming at the conclusion of a contract, the additional legal basis for the processing is art. 6 para. 1 b GDPR.

3. Purpose of the Data Processing

The processing of the personal data from the input mask only serves the purposes of facilitating contact. Where contact is made by e-mail, this constitutes the required legitimate interest in the data processing.

The other personal data processed during the sending in of the contact form have the purpose of preventing misuse of the contact form and ensuring that the information technology systems of LENHILL are secure.

4. Period of Storage

The data is erased as soon as it is no longer necessary for achieving the purpose for which it was collected. In respect of the personal data from the input mask of the contact form and the data which was sent by e-mail, this is the case when the respective conversation with the user comes to an end. The conversation has come to an end when it is apparent from the circumstances that the relevant facts have been definitively clarified.

The personal data additionally collected during the sending in of the contact form will be erased after a period of thirty days at the latest.



5. Possibilities of Objection and Removal

The user can revoke his consent to the processing of personal data at any time. If the user makes contact with LENHILL by e-mail, he can object to the storage of his personal data at any time. In such a case, the conversation cannot be continued.

In this case all personal data which were stored in the course of the contact will be erased.

VII. Web Analysis

1. Extent of the Processing of Personal Data

On its website LENHILL does not use any software tool for analyzing the user's internet surfing behavior.

VIII. Rights of the Data Subject

If personal data concerning you is processed, you are a data subject within the meaning of the GDPR and entitled to exercise the following rights against the controller:

1. Right of Access

The user can demand a confirmation from the controller as to whether personal data concerning the user is processed by LENHILL.

Where such processing takes place, the user can demand information from the controller about the following:

- (1) The purposes for which the personal data is processed;
- (2) The categories of personal data which are processed;
- (3) The recipients and/or the categories of recipient to whom the personal data concerning the user has been or will be disclosed;
- (4) The envisaged period for which the personal data concerning the user will be stored or, in case concrete information is not possible here, the criteria for determining the duration of the storage;
- (5) The existence of a right to rectification or erasing of the personal data concerning the user, of a right to restriction of the processing by the controller or a right of objection against this processing;
- (6) The existence of a right of appeal to a supervisory authority;
- (7) All available information about the origin of the data, where the personal data is not collected from the data subject;
- (8) The existence of a decision based on automated processing including profiling according to art. 22 paras. 1 and 4 GDPR and - at least in these cases - meaningful information about the logic involved as well as the consequences and the intended effects of such processing for the data subject.

The user has the right to demand information as to whether the personal data concerning the user is transferred to a third country or an international organization. In this case, the user can demand to be informed about the appropriate safeguards according to art. 46 GDPR in connection with the transfer.

2. Right to Rectification

The user has a right to obtain from the controller rectification and/or completion, provided that the processed personal data concerning the user is inaccurate or incomplete. The controller has to make the rectification without delay.

3. Right to Restriction of Processing

The user can demand the restriction of the processing of the personal data concerning the user where one of the



following applies:

- (1) If the user contests the accuracy of the personal data concerning him or her, for a period enabling the controller to verify the accuracy of the personal data;
- (2) The processing is unlawful and the user opposes the erasing of personal data and requests the restriction of its use instead;
- (3) The controller no longer needs the personal data for the purposes of the processing, but it is required by the user for the establishment, exercise or defense of legal claims; or
- (4) The user has objected to processing pursuant to art. 21 para. 1 GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing of the personal data concerning the user has been restricted, such data shall - with the exception of storage - only be processed with the user's consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a member state.

A user who has obtained restriction of processing pursuant to the above will be informed by the controller before the restriction of processing is lifted.

4. Right to Erase

a) Obligation to erase

The user has the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller has the obligation to erase personal data without undue delay where one of the following grounds applies:

- (1) The personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- (2) The user withdraws consent on which the processing is based according to art. 6 para. 1 a or art. 9 para. 2 a GDPR, and there is no other legal ground for the processing.
- (3) The user objects to the processing pursuant to art. 21 para. 1 GDPR and there are no overriding legitimate grounds for the processing, or the user objects to the processing pursuant to art. 21 para. 2 GDPR.
- (4) The personal data concerning the user has been unlawfully processed.
- (5) The personal data concerning the user has to be erased for compliance with a legal obligation under Swiss law, European Union law or member state law to which the controller is subject.
- (6) The personal data concerning the user has been collected in relation to the offer of information society services referred to in art. 8 para. 1 GDPR.

b) Information to Third Parties

Where the controller has made the personal data concerning the user public and is obliged to erase the personal data pursuant to art. 17 para. 1 GDPR, the controller, taking account of available technology and the cost of implementation, will take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the user as data subject has requested the erasure by such controllers of any links to, or copy or replication of, that personal data.

c) Exceptions

There is no right to erase to the extent that processing is necessary

- (1) for exercising the right of freedom of expression and information;
- (2) for compliance with a legal obligation which requires processing under Swiss law, law of the European



Union or member states to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; or

- (3) for the establishment, exercise or defense of legal claims.

5. Right to Notification

Where the user has exercised the right to rectification, erasure or restriction of processing towards the controller, the controller is obligated to communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data concerning the user has been disclosed, unless this proves impossible or involves disproportionate effort.

The user has the right to be informed by the controller about those recipients.

6. Right to Data Portability

The user has the right to receive the personal data concerning the user which the user has provided to a controller, in a structured, commonly used and machine-readable format. The user further has the right to transmit this data to another controller without hindrance from the controller to which the personal data has been provided, where:

- (1) the processing is based on consent pursuant to art. 6 para. 1 a or art. 9 para. 2 a GDPR or on a contract pursuant to art. 6 para. 1 b GDPR; and
- (2) the processing is carried out by automated means.

In exercising this right, the user further has the right to have the personal data transmitted directly from one controller to another, where technically feasible. This further right may not adversely affect the rights and freedoms of others.

The right to data portability does not apply to a processing of personal data which is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

7. Right to Object

The user has the right to object, on grounds relating to the user's particular situation, at any time to processing of personal data concerning the user which is based on art. 6 para. 1 e or art. 6 para. 1 f GDPR, including profiling based on those provisions.

The controller will no longer process the personal data concerning the user unless the controller can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the user or for the establishment, exercise or defense of legal claims.

Where personal data is processed for direct marketing purposes, the user has the right to object at any time to processing of personal data concerning the user for the purpose of such marketing, which includes profiling to the extent that it is related to such direct marketing.

Where the user objects to processing for direct marketing purposes, the personal data will no longer be processed for such purposes.

In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the user may exercise his or her right to object by automated means using technical specifications.



8. Right to Withdraw Consent

The user has the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

9. Automated individual decision-making, including profiling

The user has the right not to be subject to a decision based solely on automated processing - including profiling - which produces legal effects concerning the user or similarly significantly affects the user. This does not apply if the decision

- (1) is necessary for entering into, or performance of, a contract between the user and the controller,
- (2) is authorized by Swiss law or by law of European Union or member states to which the controller is subject and these legal provisions lay down suitable measures to safeguard the user's rights and freedoms and legitimate interests or
- (3) is based on the user's explicit consent.

However, these decisions may not be based on special categories of personal data referred to in art. 9 para. 1 GDPR E, unless art. 9 para. 2 a or art. 9 para. 2 g GDPR apply and suitable measures to safeguard the user's rights and freedoms and legitimate interests are in place.

In the cases referred to in points (1) and (3), the controller will implement suitable measures to safeguard the user's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and to contest the decision.

10. Right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedy, the user has the right to lodge a complaint with a supervisory authority, in particular in the member state of his or her habitual residence, the place of work or the place of the alleged infringement if the user considers that the processing of personal data relating to the user infringes the GDPR.

The supervisory authority with which the complaint has been lodged will inform the complainant on the progress and the outcome of the complaint including the possibility of a judicial remedy pursuant to art. 78 GDPR.

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