



ALPADIS PRIVACY NOTICE

Last update: **1 January 2024**

This Alpadis Privacy Notice (Privacy Notice) explains how we use personal data collected by us. Personal data is information that relates to you and may identify you as an individual. This Privacy Notice applies to the Alpadis Group as detailed in section 1 below, where we are acting as a data controller; in other words, where we determine the purposes and means of the processing of your personal data (excluding employees, non-employee workers, and job applicants to whom a separate privacy notice applies).

We do not have to receive your acceptance of this Privacy Notice, but if we need to receive your consent before using your personal data, we will explain the purpose of such use and invite you to agree to or refuse it. You can withdraw your consent at any time by contacting us (see section 1 below).

We operate and administer the Alpadis Group website <https://www.alpadis-group.com/>, which also has its Terms of Use available [here](#). Our website may contain links to websites or services not controlled by us (third-party services). Such third-party services are provided by other persons (third parties), and their personal data processing practices may differ from ours; we encourage you to read privacy notices of such third parties to be aware of how they use personal information.

If you have any questions or concerns about our use of your personal data, feel free to contact us.

1. **Who we are and how you can contact us or relevant authorities**

Who we are:

Alpadis is made up of different legal entities listed below. When dealing with one of the Alpadis Group companies, the controller of our personal data will be the company that decides how and why your personal data is processed. Where this Privacy Notice refers to *Alpadis*, *we*, *us*, or *our*, this means the particular company that is the controller of your personal data.

The Alpadis Group comprises the following entities (and their subsidiaries):

- Alpadis Group Holding AG
- Alpadis Corporate Services (DIFC) Limited
- Alpadis (Malaysia) Sdn. Bhd.
- Alpadis (Middle East) Limited
- Alpadis (Singapore) Pte. Ltd.
- Alpadis (Thailand) Co., Ltd.
- Alpadis Japan K.K.
- Alpadis Middle East Limited – Dubai Branch
- Alpadis Global Services Sdn. Bhd.
- Alpadis (Hong Kong) Limited
- Alpadis Secretaries (HK) Limited
- Alpadis Trust (HK) Limited
- Alpadis Trust (Labuan) Ltd.
- Alpadis Trust (Switzerland) AG

For the management of the Alpadis Group website, the controller of your data is Alpadis Trust (Switzerland) AG, registered under number CHE-397.751.494 and which registered address is Dianastrasse 9, 8002 Zürich, Switzerland.

How to contact us:

You can contact us:

- by email, at data.protection@alpadis-group.com
- by post, to: Alpadis Trust (Switzerland) AG, Dianastrasse 9, 8002 Zürich, Switzerland
- by using our contact form [here](#)



If we do not satisfactorily answer your questions or concerns, you can contact relevant data protection authorities: the Federal Data Protection and Information Commissioner (FDPIC) or your local data protection authority.

For the FDPIC, please refer to <https://www.edoeb.admin.ch/edoeb/en/home/deredoeb/kontakt.html>.

2. Information we may collect about you

2.1 We may collect personal information directly from you:

When you make inquiries about or purchase our services, otherwise contact us, subscribe to our newsletters, or otherwise liaise with us, we may collect from you such information as name, surname, phone number, e-mail address, address, billing address, financial information, family details (such as your marital status and full names of your spouse, partner or children), compliance-related information (including a copy of your national identity card or passport), and all kinds of information from correspondence, contacts, and interactions with us. We also process all kinds of information disclosed to us in relation to our services. In some cases, we may collect sensitive personal information (see section 2.4 below)

2.2 We may collect certain information automatically:

For instance, when you use our website or contact us through electronic means. This information includes:

- Technical information. This information includes the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system, the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), page response times, download errors, length of visits.
- Cookies. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and allows us to improve our website. For detailed information on the cookies that we use and the purposes for which we use them, see our Cookies Notice [link](#).

2.3 Information we receive from other sources:

We may receive information about you from various third parties, including our service providers, clients, and contractual partners. We may also collect information about you from publicly available sources, including debt collection registers, land registry, commercial registers, the media, or the Internet including social media.

2.4 Sensitive personal information

Such personal information as ethnicity, religious and political opinions, and information relating to your health or sexual life has a higher degree of legal protection. Such information is broadly known as sensitive information or special categories of personal information. We do not generally seek to process special categories of personal information. Nonetheless, there are limited cases where we do seek to collect such data, for instance, where this information is needed to provide you with the services you requested from us or as may be required for the performance of our agreements with you and by law. We will do this in accordance with data privacy law requirements and ask for your consent if required.

2.5 Children

Our services are not intended for individuals under the legal age as defined by applicable laws and regulations. However, in the provision of our services, there may be instances where we collect data about children. In such cases, we rely on the assurance that the individual providing such data has the legal right to do so, including but not limited to parental consent or authorisation.



3. Purposes and legal bases of personal information processing

We process your personal information for specific reasons (purposes). Also, we may need to have specific grounds (also known as legal bases) to process your personal information. Below, you can see these reasons and legal bases (as applicable to you):

- Running our services
e.g. recordkeeping, security maintenance and fraud prevention, managing risks and/or obtaining professional advice, establishment, exercise, or defence of legal claims
Legal basis: legitimate interest; legal requirements
- Performing our agreements
compliance with our contractual obligations, including managing our mandates (e.g. advice to our clients, representation, and correspondence), generating invoices or other payment documents
Legal basis: contract
- Improving our services
testing features, interacting with feedback platforms and questionnaires, managing our website and other landing pages, traffic optimisation and data analysis and research
Legal basis: legitimate interest
- Newsletters and communication
sending you emails and messages about events, products, services, and related content
Legal basis: legitimate interest; consent
- Other reasons
we may seek your consent for specific purposes. When we do so, we will explain the particular purpose in the relevant consent request;
we may be required to take some actions by law or public authorities. If we really obliged to do so, we may use your personal information to comply with such requirements.
Legal basis: consent; legal requirements

More details on legal bases:

Contract: we generally process your personal information when we need to do so to fulfil a contractual obligation or where we take steps as requested by you.

Legitimate interest: we may process your information for legitimate purposes relating to our business – for example, for security maintenance or fraud prevention.

Legal requirements: we may use your personal information when we are obliged to meet our legal obligations – for example, we have to keep records to comply with our tax obligations.

Consent: we may also use your personal information where you have provided your consent. At any time, you have a right to withdraw your consent – the easiest way to do so is to email us by data.protection@alpadis-group.com.

4. Providing your personal information to third parties

We use third parties to provide you with our services and products, and to maintain and improve our business. When we do this, sometimes it is necessary for us to share your personal information with them in order to get these services to work well. We work with the following third parties:



- services providers: this generally includes IT providers, customer communication and relationship management service providers, identity verification service providers, payment processing providers, postal service providers, audit, and accounting service providers;
- clients and other contractual partners: this generally includes our clients and our other contractual partners, as necessary or useful for the performance of our contractual obligations such as law firms, insurance companies, auditors, accountants, banks, or other financial institutions.

We may also share your personal information:

- within the family of companies controlled by us (see section 1), primarily for business and operational purposes;
- if we go through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of our assets, your personal data will likely be among the assets transferred; and/or
- when legally required to do so (e.g., to cooperate with law enforcement investigations or other legal proceedings).

If certain cookies are enabled on your device, then we may also share cookie-related information with related service providers, such as analytics. Please, check our Cookies Notice for more details [link](#).

5. **Where, when, and how we store your personal information**

- 5.1 **Place.** The personal information we collect may be stored and processed in any country where we have facilities or in which we engage service providers, and where Alpadis Group operates, including the U.S., Singapore, Malaysia, Hong Kong, Thailand, and the United Arab Emirates. Some countries are recognised by the UK, Switzerland and the European Commission as providing an adequate level of data protection. For transfers from the EEA, the UK, or Switzerland to countries not considered adequate by respective authorities, we have put in place adequate measures, such as by ensuring that the recipient is bound by Standard Contractual Clauses, to protect your personal information.
- 5.2 **Duration.** We retain your personal information only as long as reasonably necessary to provide you our services and as required by applicable laws and regulations. If you opt for deletion of your personal information, we may still keep minimal necessary information about you for the period of time required for us to comply with legal obligations, resolve disputes or enforce our agreements.
- 5.3 **Security.** Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee absolute data security. Once we have received your information, we will use strict procedures and security features to ensure data security.

6. **Your data protection choices and rights**

Under data protection laws, you may have specific rights in relation to our processing of your information, such as the right to access, rectify, object to, or complain about the processing and request your data erasure or blockage.

Data subject rights may be subject to exemptions and limitations under applicable data protection laws. The exercise of such rights generally requires that you clearly prove your identity (e.g. with a copy of an ID, if your identity cannot otherwise be clearly verified).

We may exceptionally provide for costs for the exercise of rights. We will inform you in advance of any such costs.

Please contact us (see section 1 above) if you wish to make a request in relation to your rights:

- a. Your right of access – you have the right to ask us for copies of your personal information;



- b. Your right to rectification – you have the right to ask us to correct personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- c. Your right to erasure – you have the right to ask us to delete your personal information;
- d. Your right to restriction of processing – you have the right to ask us to restrict the processing of your personal information;
- e. Your right to object to processing – you have the right to object to the processing of your personal information;
- f. Your right to data portability – you have the right to ask that we transfer the personal information you gave us to another organisation, or to you;
- g. Your right not to be subject to a decision based solely on automated processing - this includes profiling or any other practice which produces legal effects or otherwise significantly affects you.
- h. Withdrawal of your consent and opt-outs – if you want to withdraw your consent previously given to us or opt out from direct marketing, you can do so at any time – the easiest way is to email us at data.protection@alpadis-group.com.

Also, you have the right to lodge a complaint regarding our use of your personal information. Please tell us first, and we will address your concerns. If it does not work, you can contact relevant data protection authorities – see section 1 above.

You may not provide us with your personal information if you do not want to do so. Please, note that if you choose not to provide us with certain information about you, you may not be able to use all or a part of our services.

7. Changes to our Privacy Notice

We may change our Privacy Notice from time to time. Any changes we make to our Privacy Notice in the future will be posted on this page and where appropriate, may be notified to you by e-mail. Please check back regularly to see any updates or changes to our Privacy Notice.