



DATA PROTECTION POLICY

Last Updated: February 2024

General note

We take the protection of your personal data very seriously and treat your personal data confidentially and in accordance with the statutory data protection regulations and this data protection policy.

This this data protection policy explains what personal data we collect and what we use it for. It also explains how and for what purpose this is done. Personal data is data that relates to an identified or identifiable person and that we collect, process and store. T&T Attorneys at Law Ltd. collects personal data in accordance with the statutory provisions.

The following data protection declarations (for customers, business partners, users of the website and applicants) provide you with an overview of the processing of your data and your rights in accordance with the General Data Protection Regulation (GDPR) and the Liechtenstein Data Protection Act (DSG).

I. Data Protection Policy for Customers

a. Responsible body and Data Protection Officer

If you have any questions or concerns about data protection law in connection with the use of our services or our website, you are welcome to contact us at any time. You can contact us as follows:

Tihanyi & Talic Attorneys at Law Ltd.

Landstrasse 102

9494 Schaan

Principality of Liechtenstein

T +423 340 88 10

office@ttlaw.li

www.ttlaw.li

Due to the size of our company and the type and nature of the data we collect, we have not appointed a data protection officer within the meaning of the General Data Protection Regulation in accordance with the GDPR.

b. Collection and storage of personal data

We only process necessary data, which includes

- Personal details, address and contact data (e.g. surname, first name, date of birth, address, telephone number, e-mail address)
- Information on the assertion and defence of your rights within the scope of the mandate

On the one hand, your data is collected when you provide it to us. This may, for example, be data that you provide to us when you contact us. Other data is collected automatically or with your consent by our IT systems when you visit the website. This is primarily technical data (e.g. internet browser, operating system or time of page view). This data is collected automatically as soon as you enter this website.

The processing is carried out for the appropriate processing of the mandate, invoicing, settlement of claims and fulfilment of legal obligations.

c. Recipients of the personal data

Your data will only be processed within our law firm by authorised employees. Data will only be passed on to third parties who are required by law or agreement.

d. Transfer to third countries

In the case of recipients outside the European Economic Area or in countries with recognised data protection adequacy (e.g. Switzerland), we ensure data protection. If we transfer personal data to third countries without adequate legal data protection, we ensure an adequate level of protection in accordance with legal requirements, for example on the basis of EU standard contractual clauses or other instruments.

e. Origin of the data

The data is collected directly or by third parties (service providers).

f. Duration of storage

Your data will be stored until the statutory retention period expires and then deleted, unless longer storage is required by law.

g. Automated decision making

There is no automated decision-making.

h. Necessity of the data

This data is necessary for the client-attorney relationship.

i. Your data protection rights

As a data subject, you have the right to information, correction, data transfer, objection, restriction of processing or deletion of your data.

You therefore have the right to object to the processing of your personal data by us at any time. If you have given us your consent to use your personal data, you can revoke this at any time without giving reasons. You also have the right to lodge a complaint directly with the Liechtenstein Data Protection Authority (www.datenschutzstelle.li).

If you wish to assert the above rights, please contact the address or contact details provided by us.

j. Current version

This Data Protection Policy is valid from February 2024.

Due to the further development of our website and our range of services or due to changes in legal or regulatory requirements, it may be necessary to amend this Data Protection Policy on our website. Please therefore regularly read the current version of this Data Protection Policy. Subject to the applicable legal provisions, all changes to the data protection declaration will come into force as soon as the updated Data Protection Policy is published.

II. Data Protection Policy for Business Partners

The protection of the personal data of our contact persons and business partners is important to us. We therefore attach great importance to complying with the statutory provisions on the protection of personal data.

a. Name and address of the controller and contact details of the data protection officer

See above, 1. a.

b. Collection and storage of personal data and the nature and purpose of their use

In our collaboration with various companies such as cooperation partners and service providers (e.g. IT service providers), we process personal data of contact persons for purposes such as

- Communication on services and projects
- Planning, implementation and management of (pre-)contractual business relationships
- Payment processing for accounting purposes and other purposes related to the contract
- Maintaining our services
- Fulfilment of legal requirements (e.g. retention obligations under tax and company law)
- Settlement of legal disputes, enforcement of existing contracts and assertion, exercise and defence of legal claims.

We process the following categories of personal data for the aforementioned purposes:

- Contact information such as first and last name, business address, business telephone number and e-mail address
- Payment data required for the processing of payment transactions or for the prevention of fraud
- Further information that is required in the context of projects or the processing of contractual relationships or that is provided voluntarily by our contact persons
- Information obtained from publicly available sources, information databases or credit agencies.

The processing of this data primarily serves to initiate, maintain and process our contracts and services offered. The processing of personal data is necessary to achieve the aforementioned purposes and may also be in our legitimate interest, as it enables us to utilise and provide services.

Customer care is also in our legitimate interest. Data processing is carried out in accordance with Art. 6 para. 1 lit. b GDPR for the stated purposes (fulfilment of a contract or implementation of pre-contractual measures) for the appropriate processing of our order and the mutual fulfilment of obligations arising from the client-attorney relationship. The data is also processed to fulfil legal obligations (Art. 6 para. 1 lit. c GDPR), in particular to comply with legal and regulatory requirements (e.g. requirements of tax and company law retention obligations). We reserve the right to further process personal data collected for one of the aforementioned purposes for other purposes if this is compatible with the original purpose or is permitted or required by law (e.g. any reporting obligations).

c. Recipients or categories of recipients of the personal data

It may also be necessary to disclose data in order to process data in compliance with the law. External service providers and organisations may receive personal data, including

- External accounting
- Auditors
- Service companies such as banks, asset management companies, insurance companies, IT providers & service providers
- Other co-operation partners or partner companies
- Public interest organisations at home and abroad

d. Transfer of personal data to third countries

See above, 1.d.

e. Origin of the data

The data is generally collected directly and in some cases by third parties (particularly in the case of recommendations from potential business partners).

f. Duration of storage of personal data

Personal data is processed and stored during the ongoing business relationship in accordance with the statutory provisions. After termination of the business relationship, this data is stored in accordance with statutory provisions (PGR, ABGB). A longer retention period may result from our legitimate interest or in the case of a given consent.

g. Automated decision making

See above, 1.g.

h. Necessity of the data

As a rule, we require the data specified in Section 1.b. in order to enter into or maintain a business relationship.

i. Your data protection rights

See above, 1.h.

j. Current version

See above, 1.j.

III. Data Protection Policy for the use of our website

a. Name and address of the controller and contact details of the data protection officer

See above, 1.a.

b. Provision of the website

Each time our website is accessed, our system automatically collects data and information from the computer system of the accessing computer

- Information about the browser type and version used
- Operating system of the user
- Internet service provider of the user
- IP address of the user
- Date and time of access
- Website of origin

The latter three types of data are only stored in summary form, so it is not possible to assign IP addresses to the originating website or time. It is only possible to determine from which Internet pages and at what time most accesses are made. There is no personalised analysis and no disclosure to third parties. We store this information in accordance with legal regulations. The processing is carried out for reasons of data security in order to ensure the stability and operational security of our system. The legal basis is Art. 6 para. 1 lit. f GDPR.

c. Analysis tools and tools from third-party providers

When you visit this website, your surfing behaviour may be statistically evaluated. This is mainly done with so-called analysis programmes.

Detailed information on these analysis programmes can be found in the following Data Protection Policy.

We use a map section from OpenStreetMap (<https://www.openstreetmap.de/>) on our website to show you how to find us. OpenStreetMap is an open source mapping tool. Your IP address is forwarded to OpenStreetMap so that the map can be displayed to you. You can find out how OpenStreetMap stores your data on the OpenStreetMap data protection page: https://wiki.openstreetmap.org/wiki/Legal_FAQ Legal basis for the use of the aforementioned tool on Art. 6 para. 1 let. f GDPR: the data processing is carried out to improve the user-friendliness of our website.

d. Cookies

If we use so-called "cookies" on our website, we want to make our offer user-friendly and improve it.

Cookies are small text files that your browser creates automatically and do not cause any damage to your end device (computer, tablet, smartphone, etc.). They are stored on your device either temporarily for the duration of a session (session cookies) or permanently (permanent cookies). Session cookies are automatically deleted at the end of your visit. Permanent cookies remain stored on your end device until you delete them yourself or they are automatically deleted by your web browser.

Cookies that are required to carry out the electronic communication process, to provide certain functions you have requested or to optimise the website are stored on the basis of Art. 6 para. 1 lit. f GDPR, unless another legal basis is specified.

Cookies have various functions. Many cookies are technically necessary, as certain website functions would not work without them. Other cookies are used to evaluate user behaviour or display advertising or to store necessary cookies for the technically error-free and optimised provision of services. If consent to the storage of cookies and comparable recognition technologies has been requested, the processing is carried out exclusively on the basis of this consent (Art. 6 para. 1 lit. a GDPR); consent can be revoked at any time.

You can set your browser so that you are informed about the setting of cookies and only allow cookies in individual cases, exclude the acceptance of cookies for certain cases or in general and activate the automatic deletion of cookies when closing the browser. If cookies are deactivated, the functionality of this website may be restricted.

In some cases, cookies from third-party companies may also be stored on your device when you visit our website (third-party cookies). These enable us or you to use certain services of the third-party company. If cookies are used by third-party companies or for

analysis purposes, we will inform you about this separately in this Data Protection Policy and, if necessary, request your consent.

e. SSL or TLS encryption

This site uses SSL or TLS encryption for security reasons and to protect the transmission of confidential content that you send to us as the site operator. You can recognise an encrypted connection by the fact that the address line of the browser changes from "http://" to "https://" and by the lock symbol in your browser line.

If SSL or TLS encryption is activated, the data you transmit to us cannot be read by third parties.

f. File downloads

We do not require any personal information from you in order for you to download files from our website.

g. Social media

This website uses elements of the LinkedIn network. The provider is LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland.

Each time you access a page on this website that contains elements from LinkedIn, a connection to LinkedIn servers is established. LinkedIn is informed that you have visited this website with your IP address. If you click on the LinkedIn "Recommend" button and are logged into your LinkedIn account, LinkedIn is able to associate your visit to this website with you and your user account. We would like to point out that, as the provider of the pages, we have no knowledge of the content of the transmitted data or its use by LinkedIn.

If consent has been obtained, the above-mentioned service is used on the basis of Art. 6 para. 1 lit. a GDPR. Consent can be revoked at any time. If no consent has been obtained, the service is used on the basis of our legitimate interest in the widest possible visibility in social media.

Data transfer to the USA is based on the standard contractual clauses of the EU Commission. You can find details here: <https://www.linkedin.com/help/linkedin/answer/62538/datenubertragung-aus-der-eu-dem-ewr-und-der-schweiz?lang=de>.

Further information on this can be found in LinkedIn's Data Protection Policy at: <https://www.linkedin.com/legal/privacy-policy>.

h. Duration of storage of personal data

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

i. Your data protection rights

See above, 1.h.

j. Current version

See above, 1.j.

IV. Data Protection Policy for Applications

a. Name and address of the controller and contact details of the data protection officer

See above, 1.a.

b. Collection, storage of personal data and the nature and purpose of their use

We collect and process personal data from applicants for the purpose of handling the application process as follows:

- 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 and employment references and confirmations;
- Information from the job interview such as salary expectations, type of desired employment, starting date;
- Information from correspondence during the application process;
- Results from test procedures;
- Data on references; and/or
- Further relevant information for checking or establishing an employment or service relationship.

Your data is collected when you provide it to us (on paper, electronically by e-mail, by telephone, by filling in a form, by making it publicly available or by disclosing it to third parties).

The personal data is used to verify or establish the employment or service relationship or to contact you.

If an employment contract is concluded with an applicant, the personal data received will be processed for the purpose of handling the employment relationship in compliance with the statutory provisions.

c. Transmission of personal data

Your personal data may be shared with other internal departments or IT providers responsible for the application process. Your personal data will not be transferred to countries outside the European Economic Area or to international organisations in connection with your application.

d. Duration of storage of personal data

After rejection, the application documents will be deleted, unless deletion conflicts with any legitimate interests on our part, for example in connection with a burden of proof in terms of equal treatment. If we retain your application dossier for future positions, you will be explicitly asked for your consent.

e. Your data protection rights

See above, 1.h.

f. Current version

See above, 1.j.