Privacy policy

1. **Privacy policy**

This privacy policy is to inform you about how we process your personal data. We process your personal data when you visit our website, enter into a customer relationship or other type of contractual relationship with us and/or purchase services and products from or apply to work for us or otherwise deal with us.

We will inform you in good time about additional processing activities not mentioned in this data protection declaration.

The processing of your personal data is subject to the Swiss Data Protection Act and, where applicable, the EU General Data Protection Regulation ("GDPR").

1. **Our company**

The company listed below is responsible for your data processing, unless otherwise communicated:

Concept Capital Group AG

Talacker 41

8001 Zürich

If you have any concerns about data protection or wish to exercise your rights, please contact the office listed below:

Concept Capital Group AG

Executive Board

Talacker 41

8001 Zürich

info@conceptcapital.world

1. **Processing of personal data**

Personal data[[1]](#footnote-1) means all information relating to an identified or identifiable natural person. Data processing" means any handling of personal data, in particular the acquisition, storage, use, modification, disclosure, archiving, deletion or destruction of data.

When processing personal data, we observe the principles of data protection law. Where necessary, we process personal data only with your prior consent.

We process personal data that we receive from you or from third parties. Where permitted and appropriate, we then obtain personal data ourselves, e.g. from publicly accessible sources such as the internet, newspapers and reports.

If you provide us with personal data of other persons, you must be authorised to do so, e.g. by obtaining permission from the data subject. The data must then be correct. Please also ensure that they have read and understood this privacy policy.

1. **Data processing**

## Visitors to our website

## We can process personal data when you visit our website www.conceptcapital.world.

In particular, we can process the following data:

* Technical data, such as the IP address, browser used, operating system, cookies

Minutes etc.

* Data related to the use of our contact form

Further information on visiting our website and the associated data processing is set out below in section 11.

## Customers

We process personal data that we receive during (initiating) a client relationship. We receive the data directly from you while providing our services in asset and wealth managementor partly through third parties, such as banks, asset managers, auditors or obtain them ourselves.

In particular, we process the following data:

* Master data (e.g. name, address, email address, telephone number, date of birth, gender, nationality, social media profiles, copies of IDs)
* Contractual data, i.e. the data we need to process the contractual relationship with you (e.g. type of contract, services, financial data, etc.).
* Data that we need to fulfil our due diligence investigations, e.g. data for identification or background checks
* Data on your preferences, e.g. based on the products and services you request
* Financial information
* Communication data

## In the application procedure

As a matter of principle, we process the data that we receive from you or from third parties in the context of your application or obtain ourselves.

In particular, we process the following personal data:

* Master data (e.g. name, address, email address, telephone number, date of birth, gender, nationality, social media profiles, copies of IDs)
* Communication data
* Data from your CV
* Data from your references
* Information from reference persons
* Extract from the criminal record, extract from the debt collection register or other government information, confirmations, etc.
* Data that we obtain in the context of further clarifications (e.g. creditworthiness information, personal data in media reports, etc.).

It is possible that sensitive personal data will be processed. If your consent is required for this, we will inform you separately.

## Business partners & other third parties

We process personal data that we receive as part of the (initiation of the) business relationship with you or with a business partner or in another context. We receive the data directly from you, from third parties or obtain it ourselves.

In particular, we process the following data:

* Master data (e.g. name, address, email address, telephone number, date of birth, gender, nationality, social media profiles, copies of IDs)
* Contractual data, i.e. the data we need to process the contractual relationship with you (e.g. type of contract, services, financial data, etc.).
* Communication data
* Data that we obtain in the context of further clarifications (e.g. creditworthiness information, personal data in media reports, etc.).

1. **Purpose of processing**

The purpose of processing, i.e. the way we process your personal data, depends on how you deal with us.

We process your data in particular for the following purposes:

We process data for the recording, administration and processing of **customer, contractual and employment relationships**, i.e. e.g.

* Provision of our services/offer of our products to you
* Fulfilment of contractual obligations
* When you apply for a job with us
* Fulfilment of our due diligence obligations, e.g. within the scope of "Know your Customer" clarifications or in supply chain management
* Further development of services and products
* Marketing including the organisation of events Market and opinion research, statistical surveys, testing and optimisation of procedures for needs analysis for the purpose of direct customer contact as well as collection of personal data from publicly accessible sources for the purpose of customer acquisition.
* Sending publications, information on events and for sending newsletters
* Media monitoring
* Assertion of legal and other claims and defence in connection with legal disputes and official proceedings
* Prevention and investigation of criminal offences and other misconduct incl. conducting investigations

For **communication** with you, i.e. e.g.

* Contact
* Exchange of information and response to requests
* Relationship management
* Assertion of your rights

Communication can take place using all common means of communication, e.g. by letter, via e-mail, via an app, by telephone via social media, via chat, via forms on our website, etc.

In connection with **ensuring "compliance",** i.e. if laws and regulations, orders/recommendations etc. from authorities, internal regulations etc. must be complied with or within the scope of the due diligence clarifications carried out by us.

For **operating the website** [www.conceptcapital.world](file:///C:\Users\ellor\Desktop\CCG%20Datenschutz%20Neu%202023\www.conceptcapital.world). For further information, please refer to section 11.

For **other purposes** such as safeguarding our legitimate interests and our rights, to ensure the functioning of our business (incl. accounting, risk management, granting signatory powers, in the context of M&A transactions, to ensure operational security and to clarify facts/misconduct, for training and educational purposes etc.

1. **Data transfer and data transmission abroad**

We may share your data with third party recipients where necessary based on your consent or if they need your data to fulfil our contractual and legal obligations or to carry out their respective tasks. We may then share your data to protect our legitimate interests.

In particular, the recipients listed below may receive your data:

* Third parties such as consultants, marketing companies, translation agencies or providers of IT services who process your data as well as other external service providers and bodies such as banks, asset managers, insurance companies, auditors, associations
* Our contractual partners incl. our customers, i.e. possibly your employer
* Public bodies and authorities (e.g. FINMA, tax authorities) in the event of a legal or supervisory obligation or quality controls
* Third parties who have access to the personal data processed in the course of visiting our website
* Other third parties, such as alternative delivery addressees, recipients of payments and services, third parties in the context of M&A transactions, lawyers, industry organisations, etc.

The recipients of your data may in turn involve third parties. We restrict the processing by some selected third parties, e.g. contractually. For other third parties, this is not always possible (e.g. public bodies and authorities as well as financial intermediaries)

The recipients of your data may be located in Switzerland, Europe but in exceptional cases may be located in any other country in the world.

If the data recipient is located in a country without adequate legal data protection and is not already subject to a recognised set of rules to ensure data protection, corresponding additional protective measures will be necessary, e.g. through contractually agreed specific data protection clauses. However, exceptions to this rule (e.g. in direct connection with the conclusion or performance of a contract, legal proceedings abroad, overriding public or private interest or your consent) may occur.

1. **Profiling & automated individual decision**

We do not carry out automated processing of personal data. This would consist of using your data to evaluate certain personal aspects relating to you, to analyse or predict aspects relating to your work performance, economic situation, health, personal preferences, interests, reliability, behaviour, location or change of location. Where necessary, we will obtain explicit consent to do so.

1. **Information, correction, cancellation, and restriction**

You have the right to request information about which of your data we process. You can also request that your personal data be corrected, blocked or deleted.

In addition, you have the option of receiving certain personal data relating to you in a structured, common and machine-readable format and transmitting it yourself or through us to another person responsible.

If our data processing is based on your consent, you have the right to revoke this consent.

Finally, you have the right to assert your claims through legal channels and/or to file a complaint with the competent authority. Such an authority may be based in Switzerland or abroad.

For the rights asserted, please contact the specialist office listed under point 2 in writing. Please note that under certain circumstances your rights may not be enforceable or may be restricted. Should this be the case, we will inform you accordingly.

1. **Duration of the retention of personal data**

In principle, personal data is only retained until the purpose of the processing has been achieved; personal data is not deleted if we are obliged to retain it due to a legal or regulatory requirement, orders e.g. from authorities or a contractual agreement.

Likewise, deviating retention obligations are possible insofar as claims can be asserted against our company and insofar as we are otherwise legally obliged to do so or there is an overriding interest on our part in retention (e.g. for evidence and documentation purposes).

1. **Data security**

In order to ensure the confidentiality, integrity, availability and traceability of the data we store and process, we take extensive technical and organisational security precautions in our area of responsibility, which are regularly reviewed and adapted to technological progress.

In particular, the following measures were taken:

* Access restrictions and controls
* Data storage, email correspondence, calendar and backups secured with high encryption.
* IT network and security solutions
* Encryption of data carriers and transmissions

1. **Use of our website**

If you visit our website or our app (hereinafter referred to as website, internet presence, etc.), this generally leads to data processing.

When visiting the website, log files are stored, which contain the following information in particular:

* the name of the retrieved file
* the time (date and time) of your retrieval
* the volume of data transferred
* a message about successful retrieval
* Your web browser, operating system and the requesting domain
* the IP address

This data is evaluated exclusively for the purpose of improving our services and generally does not allow any conclusions to be drawn about your person.

By using our website and any further services based on it, you expressly consent to the associated processing of your personal data.

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## Data use

We use the information we collect about you to provide the products and services we offer, to answer your questions and to operate and improve our websites and applications. We also use your personal data to provide you with a comprehensive service via our website. For further purposes, please see section 5.

We will not disclose your personal data submitted online to third parties unless it serves one of the purposes listed in section 5 or, where necessary, you have given your express prior consent. Data may be passed on to the recipients listed in section 6.

### User profiles

As a matter of principle, we do not create any personal user profiles. In connection with the retrieval of the information you requested, data is only stored on our servers in anonymised form for the provision of our various services or for evaluation purposes. General information is logged, for example, when which contents from our offer are called up or which pages are visited most frequently.

### Use of cookies

We use so-called "cookies". Cookies are small text files that are sent to your browser by our web server when you visit our website and are stored on your computer for later retrieval. By using our website, you agree to the use of cookies.

The cookies used serve in particular to determine the frequency of use and the number of users of our websites and to continue to identify your computer during a visit to our website when switching from one of our websites to another of our websites and to be able to determine the end of your visit. In this way, we learn which section of our web pages and which other web pages our users have visited. However, this usage data does not allow any conclusions to be drawn about the user. All of this anonymised usage data is not combined with your personal data and is deleted immediately after the end of the statistical evaluation.

When you visit our website, cookies are permanently stored on your computer. This serves to optimise the user-friendliness and the easy and fast access to the web pages. Most browsers are preset to accept cookies automatically. However, you can deactivate the storage of cookies or set your browser to notify you before cookies are stored.

You can also prevent the installation of cookies by making the appropriate setting in your browser software. However, we would like to point out that in this case you may not be able to use all the functions of our website to their full extent.

### Contact form

If you make use of the possibility to send us enquiries (general or specific offer enquiry) via our contact form, we will ask you for your first and last name, your company and your e-mail address or telephone number. Furthermore, you can enter your individual message to us in the message field.

It is your free decision whether you share this data with us. Currently, all transmissions are encrypted to prevent third parties from reading them.

### Google Analytics

This website uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use the site. The information generated by the cookie about your use of the website is generally transmitted to a Google server in the United States and stored there. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf.

However, in the event that IP anonymisation is activated on this website, your IP address will be truncated beforehand by Google within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. We would like to point out that on this website Google Analytics has been extended by the code "gat.\_anonymizeIp();" to ensure anonymised collection of IP addresses.

On behalf of the operator of this website, Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity and providing other services relating to website activity and internet usage to the website operator. The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of this website. You can also prevent the collection of data generated by the cookie and related to your use of the website by Google by downloading and installing available browser plug-ins.

As an alternative to this browser plug-in or within browsers on mobile devices, you can prevent the collection by Google Analytics. An opt-out cookie will then be set, which prevents the future collection of your data when visiting this website.

### Google Maps

Furthermore, Google Maps, a map service of Google Inc. ("Google") is integrated on this website. Google Maps uses so-called "cookies", text files that are stored on your computer if you use the map function on our website.

When you click on the link, a direct connection is established between your browser and the Google server. Google thereby receives the information that you have visited our site with your IP address. If you click on the Google Maps link while you are logged into your Google account, Google can associate your visit to our site with your user account.

We would like to point out that we, as the provider of the pages, have no knowledge of the content of the transmitted data or its use by Google. Details on data collection (purpose, scope, further processing, use) as well as your rights and setting options can be found in Google's privacy policy.

1. **Changes**

This privacy policy may be amended at any time without prior notice. The version published on our website or sent to you by other means shall apply, insofar as it is more recent. Unless otherwise agreed, the privacy policy does not form part of any contract concluded with you.

Update date: **01.09.2023**

1. The terms personal data, personal information and data are used interchangeably in this privacy statement. [↑](#footnote-ref-1)