

Privacy Policy

1. Introduction

SchwittersAssociates Ltd (together with its affiliates referred to as “SchwittersAssociates” or “us” or “we”) is committed to protecting your privacy and processes personal data as a data controller in accordance with the applicable laws, regulations, and rules.

This Privacy and Cookie Policy provides information about the personal data we process about you. This Privacy and Cookie Policy explains why we are processing your personal data, what personal data we process about you and how we process your personal data, as well as your privacy rights, our use of cookies and where to go for more information.

We may unilaterally change or update this Privacy and Cookies Policy from time to time. We, therefore, advise you to regularly review this Privacy and Cookies Policy.

2. Why do we process your personal data?

We may process your personal data for the following purposes:

- Website

SchwittersAssociates uses cookies on its website (www.schwitters-associates.com). Cookies are small text files containing information that are stored on your user device (such as your computer, mobile phone, or tablet). We only place strictly necessary and analytical cookies on your device to respectively operate the website and help us understand how the website is used and performs.

For more specific information about our use of cookies, please refer to paragraph ‘Cookies’.

- Execution of an agreement

If we conclude an agreement with you for the provision of our services or to receive your services, we use your personal data to prepare, effect, perform and (possibly) terminate such agreement and maintain a relationship with you.

- Contact

You can contact us through various ways, by telephone, letter, or e-mail. We use your personal data to properly handle your question or request.

- Visit of our office

Visitors to our offices may be registered, in particular as an aid in case of calamities.

Our offices may be equipped with surveillance cameras for your safety and to protect our employees and assets. Where surveillance cameras are used, we will make sure they are identified. All images are routinely deleted, unless there has been an incident, in which case they may be viewed by (internal) investigation teams.

During your visit of one of our offices you can make free use of Wifi. Once you are logged in to our Wifi network, personal data, such as the MAC address of your device, is automatically collected.

- Laws and regulations and operation of our business

In some cases, we may use your personal data to comply with applicable laws and regulations, such as legally mandated reporting or other legal process requests. We may also use your personal data in the performance and organization of our business and internal management, for example to conduct audits and investigations, for mergers and acquisitions, finance, and accounting, archiving and insurance purposes and in the context of dispute resolution.

3. What personal data do we process?

Personal data” is any information relating to an identified or identifiable natural person.

Personal data that we process may include:

- Basic information, such as your first and last name, prefix, and title.
- Contact details, such as your e-mail address, postal address, and phone number.
- Professional details, such as your job title, department, name of organisation.
- Company details, such as address, trade register number, tax identification number.
- Financial data, such as your bank account details.
- Interaction details, such as digital or written correspondence.
- Personal data related to your visit of our website or access to our Wifi network.
- Personal data related to health, safety, and security prevention, such as surveillance cameras recordings.

Any other personal data relating to you that you provide to us, or we obtain in relation to the purposes and based on grounds set out below.

We use your personal data that you provided directly to us. For example, when you enter into an agreement with us, when you contact us, or when you visit our office. We may also receive personal data about you from other sources, such as your employer, the trade register or by using social media platforms or other publicly available sources.

4. How do we process your personal data?

Lawfulness of processing

- We use your personal data on the following basis:
- to enter into or perform under a contract.
- for compliance with a legal obligation to which we are subject.
- for our legitimate interests (e.g. protecting our (business) interests, managing and administering our relationship with you or your employer, compliance with law and regulations, and exercising and defending our legal rights); and your consent, which you may withdraw at any time. Such withdrawal does not affect the lawfulness of the processing prior to your withdrawal.

Categories of recipients

Your personal data will only be shared on a strict need to know basis with:

- Our affiliated companies and existing or future investor(s),

- Our service providers, advisors, agents, or sub-contractors.
- A competent public authority, government, regulatory or fiscal agency.

Data transfers

We only transfer your personal data outside the European Economic Area (EEA) and/or the United Kingdom if there is an appropriate level of protection.

Retention period

Your personal data is kept no longer than necessary to achieve the purposes stated in this Privacy and Cookies Policy or to comply with the relevant laws and regulations.

Security

We have taken technical and organisational measures to ensure an appropriate level of security to protect your personal data from unauthorised or unlawful processing and from loss, destruction, damage, alteration, or disclosure.

5. How can you exercise your privacy rights?

You have the right to request access to an overview of your personal data, and under certain conditions, rectification and/or erasure of personal data. In addition, you also have the right of restriction of processing concerning your personal data, the right to object to processing as well as the right to data portability. Please bear in mind that in some cases we cannot respond to your request.

To invoke your rights, please contact us by using the contact details set out in paragraph 'More information?'

6. Cookies

Our website (www.schwitters-associates.com) uses "cookies". Cookies are small text files containing information that are stored on your user device (such as your computer, mobile phone, or tablet).

The website uses first-party cookies that we place on your device and may embed third-party cookies that are placed on your device by another party (for example, when you visit a page with videos or links to YouTube). We do not have control over these third-party cookies. We, therefore, encourage you to consult the privacy policies of these third parties on their websites for information regarding their use of cookies.

We only use strictly necessary and analytical cookies to respectively operate the website and help us understand how the website is used and performs. When you visit our website for the first time, we show you a message with a summary and explanation of the cookies we use. We will ask your prior consent to place these cookies on your device, insofar as we are obliged to do so.

You may change your consent to cookies by pressing on the circular icon in the bottom left of the website.

7. More information

If you have any questions regarding the processing of your personal data, please contact us via:

info@schwitters-associates.com

If you are not satisfied with the way we process your personal data, you can also lodge a complaint with the supervisory authority.

8. Changes to this Privacy and Cookies Policy

This Privacy and Cookies Policy was last updated on 16th January 2024.