

WEBSITE PRIVACY NOTICE - Version 01.09.2023

The website www.hbmpartners.com (hereafter, the “**Website**”) is edited by:
HBM Partners AG, Bundesplatz 1, CH-6300 Zug, Switzerland, Tel+41 43 888 71 71, CHE-102.028.412 (the “**Company**”)

The Company is hereafter also referred to as “we” or “our”.

When a user uses the Website, we may collect personal data or information about the user or related to the user (also referred to as “**you**” or “**your**”) provided by the user via the Website as explained below.

We process personal data collected via our Website and data collected by us from other sources as data controller in accordance with applicable laws, which may include the Swiss revised **Data Protection Act** of 25.09.20 together with the implementation provisions in the Data Protection Ordinance coming into force on 01.09.23, as well as the Regulation (EU) 2016/679-680 of 27 April 2016 (the “**GDPR**”) and any complementing or other laws or regulations relating to the protection of personal data applicable to us (together the “**Data Protection Laws**”).

“Personal data” means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, in particular by reference to an identifier such as name, identification number, location data, online identifier or to one or more factors specific to, for instance, the physical, economic, cultural or social identity of that natural person. Under some laws, data relating to identified or identifiable legal entities may constitute personal data as well.

The present notice is deemed to inform you in your capacity as user of the Website more precisely about the type of data we process, the legal basis for such processing and its purposes and the rights you have in that respect.

Where the user has otherwise entered into a contractual relationship with the Company, the data protection notice relating to that relationship shall apply in addition to the present notice applying in your capacity as user of the Website.

The Website is hosted on a server located in Switzerland operated by a third-party hosting provider on our behalf. The personal data collected via the Website will be hosted on this server.

1. Identity and contact details of the Controller

The Company referred to above is to be considered as data controller (the “**Controller**”) with respect to the personal data it processes in relation to you as described below.

For any personal data processing related questions you may contact us at: privacy@hbmpartners.com

2. Type of personal data collected by the Company

For the purpose of providing the services accessible on or via the Website, we collect and process personal data of any user who contacts us via our main contact email address info@hbmpartners.com or via our [newsletter subscription form](#).

Regarding these above-mentioned actions, we may refer to the user as the “**Contacting User**”. The personal data collected from a Contacting User in relation to a specific request for a product or a service as offered on the Website via our dedicated form may include in particular (in no particular order): Language, First Name, Last Name, Company, Address, Phone, Email. We will collect the email address, the signature block, the content of the email and its potential attachment(s) when we receive a communication from a Contacting User.

Depending on the type of request or reason for contacting us, we may collect additional information about the Contacting User from publicly available sources (such as professional or social online networks), services providers, colleagues to the extent it is relevant to process the request.

Personal data collected from all users

We use cookies on this Website. Cookies are small text files that are sent when you visit a website and stored in the user's device or computer. Upon revisiting the Website, the user's browser returns the content of the cookies, thereby allowing user recognition.

We use cookies to obtain information about how you use our website to help us constantly improve our offer and our communication with you. We need certain cookies for reliable provision of our online offer. Furthermore, we use cookies to obtain information about the device, operating system and web browser you use, so that we can adapt our content and display it correctly to you. We collect information about how you came to our website, such as the ad banners or links that brought you to our Website, so that we can improve our communication with you. This includes information about your IP address (this is the Internet address assigned to your device).

You may of course configure the settings of your internet browser to accept, reject and delete cookies and to verify cookies information.

For more information on the use of cookies by this website please read our Cookie Policy available on this Website or by clicking on the following link: [Cookies Policy](#)

Sensitive Data

We do not request any sensitive personal data that is particularly worthy of protection from you; neither do we wish to process such data.

Sensitive personal data is data relating to your racial or ethnic origin, political opinion, religious or philosophical beliefs, health and sexual life, and genetic or biometric data.

Therefore, if you deliberately include such sensitive personal data about yourself (or other persons) in the incoming communication and/or documents sent to us, we consider that we have received the consent to use it for the purpose of responding to your query. To the extent we consider the sensitive personal data not useful for the purpose of handling your request, we endeavor to delete such data.

3. Purposes and legal grounds regarding the processing of personal data

The Company will only process your personal data collected via the Website for **purposes** related to the management of your incoming correspondence, and/or responding to your request(s) for our investment products and/or other service(s) as available via the Website.

The **legal grounds** for such processing of your personal data are the following (combined or separately as applicable):

- the processing of your personal data is necessary in order to take steps at your request prior to entering into a contract with you, and/or,
- the processing is based on your consent in order to subscribe to our newsletters (being understood that you can withdraw your consent at any time, without this affecting the processing carried out before such withdrawal and without prejudice to retention or processing that may be required from us by law),
- the processing of your personal data is necessary for compliance with a legal obligation to which the Company is subject, and/or,
- the processing of personal data is necessary for satisfying the Company's legitimate interests such as i) seeking maximum efficiency (including IT efficiency and security) for a continuous functioning of the Website, ii) responding to your requests, job applications or applications for receiving a credit card and/or opening a deposit account, iii) improve our online offer and our communications with you.

4. Recipients of Personal Data

Your personal data are or may be transmitted by us to the following recipients to the extent that such disclosure or transmission is necessary for satisfying the aforementioned purposes:

- authorized employees, consultants, agents or other persons acting on behalf of the Company within the limits of their function,
- third-party IT service provider located in Switzerland ensuring the hosting and maintenance of the Website

We inform you that Switzerland is a country which is currently recognized by the European Commission as offering an adequate level of data protection based on an adequacy decision (i.e. protection considered as equivalent as within the EU).

5. Retention of your personal data

We will only retain your personal data for the period necessary to fulfill the purposes for which it was collected and to comply with our legal obligations subject to the legal periods of limitation and to the situations where the applicable laws require or allow that such personal data be retained for a certain period of time after the purposes pursued by such processing have been fulfilled.

6. Safeguarding your personal data

Data is a critical business asset and must be protected appropriate to its risk as well as its importance or value. We operate and maintain physical, electronic and procedural safeguards to ensure an appropriate level of security for your personal Data, and we restrict access only to authorized personnel. The effectiveness of these safeguards is periodically reviewed. We also have appropriate controls and mechanisms in place to detect, respond and recover in case of adverse events.

7. Your Rights

The user is hereby informed that he/she benefits from the following rights:

- (a) Right of information: right to access his/her personal data (i.e the right to obtain from the Company confirmation as to whether or not personal data concerning the user are being processed, and, where that is the case, access to the personal data and relevant information in that regard),
- (b) Right to rectification: rectification of his/her personal data (i.e the right to obtain from the Company without undue delay the rectification of inaccurate personal data concerning the user and taking into account the purposes of the processing, the right to have incomplete personal data completed),
- (c) Right to refuse or withdraw consent: right to object to the processing of the personal data (i.e. the right to object, on grounds relating to the user's particular situation, at any time to processing of personal data concerning him or her which is based on satisfying the legitimate interests pursued by the Company. Should this right be exercised, the Company shall no longer process the personal data unless the Company demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the user or for the establishment, exercise or defence of legal claims);
- (d) Right to deletion: erasure of his/her personal data.

You can exercise your above-mentioned rights by contacting us at privacy@hbmpartners.com

The user also has the right to lodge a complaint with a supervisory authority.

8. Opt -out

Any user who may receive special marketing offers from the Company by email following an opt-in request for the reception of such communications benefits from an opt-out option in order not to receive any more such type of communication in the future.

9. Change to terms of this Website Privacy Notice

Any changes we make to our Privacy Notice in the future will be posted on this website. The latest version will always be available [here](#).