



DATA PRIVACY POLICY

VERSION 1.0

14. MAY 2021

This Data Privacy Policy applies to your use of the Splint Invest websites and apps ("platform") operated by MARK Investment Holding AG ("Splint Invest ", "we", "our" or "us") and informs you ("User", "you" or "your") about the collection, use, processing and disclosure of your information.

1 PERSONAL DATA

We collect the following types of Personal Data when you use our Platform without registering::

- Use of and interaction with the platform.
- Technical data.
- Location-based data.

After your registration or after the first order, the following types of personal data are also collected:

- Identity and contact information, esp. name, email address and phone number.
- Information from identity providers such as Apple, Google, Facebook information if you choose to register with your existing accounts.
- User name and password.
- Payment data from payment service providers (credit card data, PayPal, Apple / Google Pay, Sofortüberweisung, etc.) as necessary. We do not store credit card information.
- Bank account data for the transfer from us to you.

2 HOW WE COLLECT PERSONAL DATA

We collect information about you when you use our platform, including performing certain actions within the platform.

Directly

- When you access, use, or otherwise interact with our Platform.
- When you correspond with us electronically.
- When you sign up to receive our newsletter and other marketing materials.

Indirectly

- From third parties, such as social media plugins and third party cookies.

3 LEGAL BASIS AND PURPOSES

Our legal basis for collecting and using the personal data described in this data privacy policy depends on the personal data we collect and the specific purposes for which we collect it.

Contract: To fulfil our contractual obligations or to take steps in connection with a contract with you.

- Provision and protection of our platform and services.

- Administration, management and development of our business and services.

Consent: We may rely on your voluntarily given consent at the time you provide your personal data.

- Sending news, special offers, newsletters and general information about goods and services we offer (with your explicit consent).

Legitimate Interests: We may rely on legitimate interests based on our assessment that the processing is fair and reasonable.

- Maintaining and improving our platform and services.
- Developing new services.

Public Interest: Compliance with regulatory and public interest obligations.

- Compliance with applicable regulations and laws.

4 DATA STORAGE AND RETENTION

We retain your personal data only for as long as necessary for the purposes set forth in Section 3 of this data privacy policy and only to the extent necessary to comply with our legal obligations, resolve potential disputes, and enforce our legal agreements and policies.

5 SERVICE PROVIDERS AND DATA TRANSFERS

We may engage third-party companies ("Service Providers") to facilitate the operation of our platform, assist us in analyzing the use of our Platform, or provide platform related services such as payment, delivery, or IT infrastructure services. These third party companies will have access to your personal data only and to the extent necessary to perform these tasks on our behalf and are required to protect such data in accordance with our contractual obligations and applicable data protection laws.

Such protections may include transfers to countries that provide an adequate level of protection according to country list published by the Federal Data Protection and Information Commissioner; the use of standard data protection model clauses, binding corporate rules or other standard contractual obligations that provide for adequate data protection.

6 DISCLOSURE OF DATA

We may disclose your Personal Data if, in our discretion, such action is necessary, including, without limitation:

- To comply with a legal obligation (i.e., when required by law or in response to valid requests from public authorities, such as a court or government agency);
- To protect the security of the Platform and defend our rights or property;
- To prevent or investigate possible misconduct in connection with Splint Invest ;
- To protect us from legal liability.



7 DATA SECURITY

We take proportionate technical and organizational security measures that we consider appropriate to protect your stored data from manipulation, loss or unauthorized access by third parties. Our security measures are continuously adapted in line with technological developments.

We also take internal data protection very seriously. Our employees and the service providers commissioned by us are obliged to maintain confidentiality and to comply with the applicable data protection laws. In addition, they are only granted access to personal data to the extent that this is necessary for the performance of their respective tasks or mandate.

The security of your Personal Data is important to us, but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. Although we strive to use commercially reasonable means to protect your Personal Information, we cannot guarantee your absolute security. We recommend that you use anti-virus software, a firewall and other similar software to protect your system.

8 DATA PROTECTION RIGHTS

Based on the Federal Data Protection Act, you have the following data protection rights. Please note that we may ask you to confirm your identity before responding to such requests.

- **Right of access:** You have the right to request information about whether we process personal data about you and, if so, what that data is, for what purpose we process the data, how long the data is kept or what the criteria are for determining that length of time, where the data originates, to whom the data is disclosed and who at our company is responsible for data processing.
- **Right to obtain data:** you have the right to request a copy of your personal data, which we will provide to you in electronic form.
- **Right to Amend:** You have the right to ask us to amend our records if you believe they contain inaccurate or incomplete information about you.
- **Right to withdraw consent:** if you have given your consent for us to process your personal information, you have the right to withdraw your consent. This also applies to cases where you wish to unsubscribe from marketing communications. Once we have received notification that you have withdrawn your consent, we will no longer process your data for the purposes to which you originally consented, unless there is another legal basis for the processing. To stop receiving emails from us, please click on the 'unsubscribe' link in the email you received.
- **Right to erasure:** You have the right to request that we erase your personal data if it is no longer necessary for the purposes for which it was collected or if it has been processed unlawfully.
- **Right to restriction of processing:** you have the right to request restriction of the processing of your personal data if you consider that it is inaccurate, our processing is unlawful or if we no longer need to process it for the original purpose but because of a legal obligation or because you do not want us to delete it.

- **Right to portability:** you have the right to request that we transfer your personal data in a commonly used format, such as Excel, to another data controller if it is data that you have provided to us, if we are processing it on the basis of your consent or to fulfil our contractual obligations, and if this does not require a disproportionate effort.
- **Right to object to processing:** If the legal basis for processing your personal data is our legitimate interest, you have the right to object to the processing on grounds relating to your particular situation. We will comply with your request unless we have a compelling legal basis for the processing that overrides your interests or if we need to continue processing the personal data to exercise or defend a legal claim.
- **Right to lodge a complaint with a supervisory authority:** you have the right to lodge a complaint with a data protection supervisory authority if you believe that the processing of your personal data violates data protection law. The competent data protection authority in Switzerland is the Federal Data Protection and Information Commissioner (www.edoeb.admin.ch/edoeb/en/home.html).

9 LINKS TO THIRD-PARTY APPS AND WEBSITES

Our Platform may contain links to websites or apps that are not operated by us. When you click on a third-party link, you will be directed to that third-party website or app. We have no control over, and assume no responsibility for, the content, privacy policies, or practices of any third party websites or services.

10 COOKIE POLICY

Cookies are files containing a small amount of data, often used as an anonymous unique identifier. They are sent to your browser by the website you visit and stored on your computer's hard drive.

Our Platform uses these "cookies" to collect information and improve our Platform. You have the option to either accept or decline these cookies and know when a cookie is sent to your computer. If you choose to reject our cookies, you may not be able to use some parts of our Platform.

11 CHANGES TO DATA PRIVACY POLICY

We may update our data privacy policy from time to time. Therefore, we encourage you to check this Privacy Policy periodically for changes.

Changes to this Privacy Policy will be effective when posted on this page.

12 CONTACT US

If you have any questions about this data privacy policy, please contact:

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