

SINTRO Asset Management GmbH

Website Privacy Policy

Last Updated and Effective September 5, 2023

This Privacy Policy sets forth the privacy practices of SINTRO Asset Management GmbH (the “Firm,” “we,” “our,” or “us”) with respect to our collection, use, sharing and disclosure of Personal Information, including, but not limited to, Personal Information collected through this website (the “Site”), how it is used, and the circumstances under which it may be shared and disclosed. This Privacy Policy constitutes a legally binding agreement between you and the Firm that conditions your use of the Site, where and as permitted by applicable law.

1. Personal Information

We Collect When you visit the Site and during our ordinary business activities, the Firm may collect or ask you to provide certain nonpublic personal information (“**Personal Information**”) in order to help us manage our relationship with you and serve your investment needs. The categories of Personal Information we may collect will depend on the nature of our relationship with you and the purpose for which information is being collected. The Personal Information we may collect from you may include personally identifiable information, including names, residential or business addresses, or other contact details, signature, nationality, tax identification or passport number, date of birth, place of birth, photographs, copies of identification documents, bank account details, information about assets or net worth, information on investment activities or other personal information. We may carry out background checks in the context of pre-employment screening or in connection with customer due diligence checks that we are required to undertake in compliance with our anti-money laundering and financial sanctions compliance obligations and obtain information on your credit history, criminal and administrative offences, or other special categories of personal data (including ethnic origin, health and disability) that may be contained in relevant documents or materials.

2. Sources of Personal Information

We may collect Personal Information from:

- Your communications with us;
- Your transactions with us;
- Service providers;
- Affiliates;
- Nonprofit organizations;
- Publicly available information (including publications and social media); and
- Government entities.

3. How We Use Personal Information

We use Personal Information for the following business purposes:

- To provide our products and services;
- To administer our contractual relationship;
- To process your requests and inquiries;
- To offer new products and services;
- To process transactions;
- For account maintenance;
- To confirm your identity;
- To communicate with you;
- To improve the Site;
- To protect the security and integrity of the Site;
- To prevent or investigate fraud or other unlawful activity, and detect security incidents; and
- To comply with and enforce applicable legal requirements.

4. How We Share Personal Information

Your privacy is important to us. The Firm does not disclose any Personal Information to nonaffiliated third parties, except to service or manage a client's account or as permitted by law. We do not sell any Personal Information.

5. How We Protect Personal Information

The Firm seeks to carefully safeguard Personal Information. We will use commercially reasonable efforts to ensure that Personal Information is kept secure and safe from any loss or unauthorized disclosure or use. We restrict access to our client's Personal Information to employees who require that Personal Information in order to provide products or services to our clients.

6. Contact Us

If you have any questions or comments about this Privacy Policy, please feel free to contact the Firm at contact@sintro.eu.