

## Privacy Policy

Effective December 30th, 2020

### Preamble:

This Privacy Policy (this “**Policy**”) is aimed to clarify and make users of the Site (shall be also referred hereinafter “you”, “yours”) to understand if, how and why Menomadin collects, uses, and shares information about you when you use the Site. This Privacy Policy applies to all our features embodied in and/or attached/connected/related to the website [www.menomadin.com](http://www.menomadin.com) (hereinafter the “Site”).

All capitalized terms have their definition in Menomadin’s Terms of Use, unless otherwise noted here.

### Use of your Information

To the extent permitted under any applicable law (including but not limited to GDPR) and/or regulatory requirements, Menomadin will be entitled to use the information provided to it by users of the Site to safeguard legitimate interests at its sole discretion. In particular, Menomadin will use your personal data for the following purposes:

- for technical administration, research and development of the Site;
- for customer and user administration and marketing;
- to maintain business relationships;
- to conduct research and analysis with regard to our business relations;
- to inform you about our events, services, products and news when you visit the Menomadin Website or when you subscribe to our newsletter or mailing lists;
- for fraud prevention and detection;
- to comply with any legal obligations (e.g. tax, accounting and administrative obligations)

Without derogating from the above and to the extent permitted under any applicable law, any information and/or data and/or content that will be transmitted by you or automatically collected by Menomadin while using the Site (such as information from cookies or similar technologies) will be considered as open information to which no confidentiality applies, and Menomadin and/or anyone on its behalf will be entitled to use such information, for the purposes defined above.

In addition, and without derogating from the above, you hereby give your consent that any use of the Site, which requires the entry of “**Personal Information**” (as defined hereto) and/or other basic details, whether on your own initiative or at Menomadin’s initiative, will be documented by Menomadin and/or anyone on its behalf. Menomadin stores the information it collects for as long as it is necessary for the purpose(s) for which Menomadin originally collected it. Menomadin may retain certain information for legitimate business purposes or as required by law. “Personal Information” is any information which could, alone or together with other

information, personally identify our users or otherwise be reasonably linked or connected with them. Information such as a username and password, an email address, a real name, an Internet protocol (IP) address, and a photograph are examples of user's "Personal Information".

For the avoidance of any doubt, Menomadin will not share, sell, or give away your "Personal Information" (as defined hereto) to third parties unless one of the following circumstances applies:

- (i) To comply with the law. Menomadin may share information in response to a request for information if it believes disclosure is in accordance with, or required by, any applicable law, regulation, legal process or governmental request, including, but not limited to, meeting national security or law enforcement requirements. To the extent the law allows it, Menomadin will attempt to provide you with prior notice before disclosing your information in response to such a request.
- (ii) In an emergency. Menomadin may share information if it believes it is necessary to prevent imminent and serious bodily harm to a person.
- (iii) To enforce Menomadin's policies and rights. Menomadin may share information if it believes your actions are inconsistent with the Terms, or to protect the rights, property, and safety of Menomadin and others.
- (iv) With Menomadin's affiliates. Menomadin may share information between and among Menomadin Group, and any of its parents, affiliates, subsidiaries, and other companies under common control and ownership.
- (v) With your consent. Menomadin may share information about you with your consent or at your direction.
- (vi) Aggregated or de-identified information. Menomadin may share information about you that has been aggregated or anonymized such that it cannot reasonably be used to identify you.

### **Analytics**

Menomadin may partner with third-party analytics providers to better understand your use of the Site. These third parties may collect information sent by your computer, browser, or mobile device in response to a request for content, such as unique identifiers, your IP address, or other information about your computer or device. For example: Menomadin may use analytics partners to help analyze usage and traffic for our Site. As an example, Menomadin may use analytics partners to analyze and measure, in the aggregate, the number of unique visitors to the Site.

## Security

Menomadin takes certain measures to help protect your information from being lost, stolen, or otherwise misused. We also enforce technical and administrative access controls to limit which of Menomadin's employees have access to non-public Personal Information.

## User's Rights

Users of the Site have the right at any time and free of charge to request information from us about the personal data we have stored about them, as well as about its origin, recipients or categories of recipients to whom this personal data is passed on and the purpose of its storage. Users also have the right to demand that we correct, delete or restrict the processing of the personal data at any time. Menomadin commits itself to this, unless there is a contrary legal obligation on Menomadin's part. Users also have the right to object to the processing of their personal data by us at any time. Menomadin commits itself to this, unless there is a contrary legal obligation on our part. If a user has given the consent to the use of personal data, he may revoke it at any time without giving reasons. Furthermore, users have the right to complain directly to the data protection office of Liechtenstein ([www.llv.li/#/1758/datenschutzstelle](http://www.llv.li/#/1758/datenschutzstelle)). If a user wishes to exercise the above rights, please contact the address mentioned in below.

## Menomadin's Global Privacy Practices

Menomadin has offices in Liechtenstein and other jurisdictions. The IT-infrastructure used to process and store Personal Information is located in Switzerland. However, Menomadin may transfer Personal Information to affiliates and third parties acting on behalf of Menomadin. Personal Information will in such cases only be used and processed according to the intended purpose as defined above and will only be transferred to other states if there is an adequate level of data protection regulation comparable to that in Liechtenstein, or if the recipient contractually guarantees to us an equivalent level of protection of the Personal Information.

## Changes to This Policy

Menomadin may change this Policy from time to time, at its sole discretion.

## Contact Us

If you have questions about this Privacy Policy, please contact us at:

**[data-privacy@Menomadin.com](mailto:data-privacy@Menomadin.com)**

Menomadin Management AG

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