



STONEWEG

WEBSITE PRIVACY NOTICE

Version last revised: March 2025

1. Important Contact Information

Controller Name:	Stoneweg Asset Management SA (company number CHE-338.856.293)
Controller Address:	Boulevard Georges-Favon, CH-1204 Geneva, Switzerland
GDPR Central Representative:	Privacy.eu@stoneweg.com

2. Introduction and Purpose of this Website Privacy Notice

We, the above-named Controller (“Stoneweg”, “we”, “us”) are committed to protecting your personal data and respecting your privacy. This Website Privacy Notice (the “Privacy Notice”) sets out the personal data we receive from you, how we process it, our legal obligations as Controller, and your rights in relation to your personal data.

3. Your Personal Data

When you use our website, we process certain personal data concerning you. We are authorised by law to process your personal data in the pursuit of our legitimate business interests, for compliance with a legal or contractual obligation, and where you have given consent. A legitimate interest is when we have a business or commercial reason to use your information so long as this is not overridden by your own rights and interests.

Where it is necessary to process your personal data to fulfil legal or contractual obligations, if you fail to provide certain information when requested, we will not be able to fully perform our obligations under any contract we enter into with you, or we could be prevented from complying with our legal obligations.

If we rely on your consent to process your personal data, you have the right to withdraw that consent at any time by emailing the GDPR Central Representative at the email address noted above.

4. Who Are We?

Under Regulation (EU) 2016/679 – The General Data Protection Regulation (“**GDPR**”), the UK Data Protection Act 2018, the Swiss Federal Act on Data Protection and other applicable data protection laws, the ‘Controller’ of this personal data is the company whose name and address is given at the top of this Privacy Notice.



5. Information we collect about you

We may collect and process the following personal data concerning you:

- Information that you provide by filling in forms on our site.
- If you contact or correspond with us (i.e. make an inquiry, request information or otherwise correspond with us), we may keep a record of that correspondence and any personal information you provide.
- Details of your visits to our site including, but not limited to, resources you access, traffic data, location data, weblogs, cookies and communication data.
- We may collect information about your computer, including your IP address, operating system and browser type, for business reasons such as system administration.

6. Purposes for Processing your Personal Data

We may use your personal information to process any communication you send us, to contact you should we need to or to provide you with information, products or services that you request from us.

All processing of your personal data will be carried out for our legitimate interest.

What we use your personal information for	Our reasons
To get in contact with you should we need to.	For our legitimate interests, i.e. to provide you with an effective and efficient service.
To take any action we are required or authorised by law to take.	To comply with legal and regulatory obligations.
To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.	To provide you with the information you have consented to receiving and for our legitimate interests i.e. to promote our business to existing and former clients.
To process any communication you send us (which includes answering any queries and dealing with any complaints or feedback you may have).	For our legitimate interests i.e. to provide you with effective and efficient service and assistance.

7. Secure storage and retention of your Personal Data

We have implemented appropriate technical and organisational measures to ensure a level of security appropriate to the risk presented by the processing we carry out to protect the confidentiality, integrity and availability of your personal data and to protect against unauthorised or unlawful processing and accidental loss, destruction or damage.

We will retain your personal data for as long as it is necessary to fulfil the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law.



8. International Data Transfers

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). In some cases, those countries do not provide an adequate level of protection for personal information, or do not benefit from an adequacy determination or decision by applicable governing bodies. In such cases, we take steps in line with data protection laws to adequately protect your personal information, including (if applicable) through the use of model contracts under which the recipient commits to continue to use that data in accordance with EU data protection standards.

9. Disclosure of Your Information

We may disclose your personal information to any member of the Stoneweg Group. In addition, we may disclose your personal information to third parties:

- If we wish to sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Stoneweg European Holdings Limited (previously, Cromwell European Holdings Limited) or substantially all its assets are acquired by a third party, in which case personal data held by it about its clients will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements, or to protect the rights, property, or safety of our clients, or others.

10. Your Rights

The GDPR, and other applicable data protection legislation give you certain specific rights relating to your personal data, as set out below. Please note that not all of these rights are absolute, and they do not apply in all circumstances.

- (a) **Access** – you have the right to access your personal data and certain information about how and why we are processing it;
- (b) **Rectification** – you have the right to have any inaccurate or incomplete personal data rectified without undue delay;
- (c) **Erasure** – sometimes called the 'right to be forgotten', in certain circumstances, you have the right to have your personal data erased without undue delay;
- (d) **Restriction** - in certain circumstances, you have the right to have our processing of your personal data restricted;
- (e) **Data portability** - in certain limited circumstances, you have the right to receive the personal data concerning you that you have provided to us, in a structured, commonly-used and machine-readable format and the right to transmit those data to another controller without hindrance; and
- (f) **Objection** - in certain circumstances, you have the right to object to the processing of your personal data carried out by us or on our behalf.



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11. Not to be subject to automated individual decision making

You have the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

12. Contact Us

If you would like further information on anything in this Privacy Notice, for all questions or concerns you have about your personal data, or if you think you would like to exercise any of your rights as a data subject, please contact us using the contact details at the top of this Privacy Notice.

13. Making A Complaint

If you think we have not complied with the requirements of the GDPR or other data protection legislation as it applies to your personal data, you have a right to lodge a complaint with a data protection supervisory authority. The list of EU and UK supervisory authorities can be found here: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm. The Swiss national supervisory authority is the Swiss Federal Data Protection and Information Commissioner (<https://www.edoeb.admin.ch/edoeb/de/home.html>).