

TEMPLATE – PRIVACY POLICY – WEBSITE

General

This website is operated by Lema Capital Management AG. We are responsible for the collection, processing, and use of your personal data, ensuring that this is done in accordance with applicable legal requirements, particularly the Swiss Data Protection Act (DPA) and the EU General Data Protection Regulation ("EU-GDPR"), with the EU-GDPR applying only to individuals residing in an EU/EEA country.

This privacy policy explains how we collect, store, and use personal data from visitors to this website. It also outlines how you can verify the accuracy of this information and request its deletion.

By visiting this website, you consent to the collection, storage, and use of your personal data in accordance with this privacy policy.

Changes to the Privacy Policy

We reserve the right to change, amend, or update this privacy policy at any time without prior notice. All changes will be published on this page. However, your personal data will always be processed in accordance with the version of the privacy policy in effect at the time of data collection.

Therefore, we recommend that you visit this page regularly to stay informed about any changes and ensure that you are familiar with the most current version.

Data Controller

We, Lema Capital Management AG, are responsible for processing your personal data:

24 Gubelstrasse, 6300, Zug, Switzerland

Phone: +41 78 330 9494

Email: leonardo@lemacapitalch.com

Website: www.lemacapital.ch

Personal Data

Personal data refers to any information that relates to an identified or identifiable individual.

Processing means any action or set of actions performed on personal data, regardless of the methods or procedures used, including the collection, storage, retention, use, alteration, publication, archiving, deletion, or destruction of personal data.

We generally use your personal data only as described in this privacy policy. In exceptional cases, however, we may also use your data for other purposes if permitted or required by law, such as supporting legal or criminal investigations.

Accessing Our Website

When visiting our website, our server automatically temporarily stores certain technical data, including:

- IP address of the requesting device

- Name of the internet service provider
 - Date and time of access
 - Website from which the access occurred (including search terms, if available)
 - Name and URL of the accessed file
 - Status code (e.g., in case of errors)
 - Operating system of the device
 - Browser used (type, version, language settings)
 - Hypertext Transfer Protocol (HTTP)
 - If registered: Username from previous logins
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Purposes of Data Collection

These data are collected and processed for the following reasons:

- Establishing and maintaining the connection to the website
- Ensuring the long-term security and stability of the system
- Optimizing and adapting our web offerings
- Internal statistical evaluations

The collected data does not allow us to draw any conclusions about your identity. They are used exclusively in an anonymous form for the mentioned purposes.

Security and Anti-Abuse

In the event of attacks on our IT infrastructure or unauthorized use of the website, the IP address, along with other data, will be evaluated. This information may be used to identify attackers and may be used in civil or criminal proceedings.

No Disclosure of Personal Data

We do not sell, rent, or share your personal data with third parties, except in the cases described in this privacy policy.

Disclosure to Service Providers

We may share your data with external service providers acting on our behalf to:

- Fulfill the originally intended purposes of data collection
- Implement legally permissible purposes
- Provide services
- Analyze the use of our website
- Perform marketing or data management tasks
- Ensure technical support

These service providers are contractually obligated to use your data exclusively for the agreed purposes, not to disclose it to third parties, and to comply with applicable data protection regulations.

Disclosure in Case of Business Changes

If the business of this website is sold, transferred, or assigned in whole or in part, your personal data

may be transferred to the buyer or transferee. In this case, we will also require the new owner to handle the data in accordance with this privacy policy.

Disclosure Due to Legal Obligations

We may disclose personal data if:

- It is required by law
- A court order is issued
- Official regulations require it

Additionally, data may be shared to support legal or criminal investigations both domestically and internationally, if necessary.

Right to Access, Rectification, and Objection

We strive to keep the personal data we process accurate and up-to-date. You have the right to object to the processing of your personal data if there is no legitimate business or legal purpose for such processing.

If you:

- Wish to access your stored personal data,
- Want to have corrections or updates made, or
- Object to the processing of your personal data,

please contact us by email at leonardo@lemacapitalch.com.

Please provide the following:

- The name of the website where the data was collected,
- The data to be corrected, updated, or deleted, and
- An identification of yourself to confirm your request.

Requests for the deletion of personal data are subject to our legal and ethical obligations regarding archiving and retention.

Security and Confidentiality

We protect the personal data we collect through:

- Secure data networks,
- Industry-standard firewalls, and
- Password systems.

We take appropriate measures to protect your data from:

- Loss,
- Misuse,
- Unauthorized access,
- Disclosure,
- Alteration, or
- Destruction.

Despite all security measures, absolute security on the internet cannot be guaranteed. Therefore, we recommend that you also take precautions to protect your data.

Cookies

We use cookies on our website. Cookies are small text files stored on your computer system through your internet browser.

Many websites and servers use cookies, and we also use this technology. Cookies often contain a so-called cookie ID, a unique identifier that allows us to recognize the internet browser used. This helps us improve your user experience and optimize your visit to our website by distinguishing your browser from others.

By using cookies, we aim to make your use of our website more pleasant. For example, you won't need to log in again on each visit as your login credentials are stored in the cookie.

Of course, you can disable cookies at any time in your internet browser settings and object to the storage of cookies. You can also delete cookies already stored via browser settings or other software. However, please note that some features of our website may not be fully available if cookies are disabled.

This website might use Google Analytics, a web analytics service provided by Google LLC ("Google") based on our legitimate interests (interest in optimizing our online offerings). Google Analytics uses cookies, text files stored on your computer, to analyze your use of the website. The information generated by the cookie about your use of this website is typically transferred to and stored on a Google server in the USA. However, due to IP anonymization on this website, your IP address will be truncated by Google before it is stored. Google is certified under the Privacy Shield Framework.

You can prevent the storage of cookies by adjusting your browser settings. Additionally, you can prevent the collection of data generated by the cookie about your use of the website (including your IP address) and the processing of this data by Google by downloading and installing the browser plugin available at the following link.

We use Google Maps provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, to provide interactive maps and location information. When you visit pages with embedded maps, data such as your IP address is transferred to Google servers in the USA and stored there. If you are logged into Google, this data will be linked to your Google account. If you wish to avoid this, log out of your Google account before using Google Maps. Even without a user account, Google creates usage profiles for personalized advertising and market research purposes (Art. 6 (1) f GDPR). You can object to this profiling by contacting Google directly.

Google is certified under the Privacy Shield, ensuring that your data is protected in accordance with EU standards. If you want to prevent data transfer to Google, you can disable JavaScript in your browser – please note that Google Maps will not function if you do this.

For more information, please refer to Google’s Terms of Use, the additional terms for Google Maps, and Google's Privacy Policy.

We provide a contact form and email address on our website to enable quick and direct communication with us. When you contact us by email or via the contact form, we store the personal data you provide. This data is used solely to process your request or to contact you. We do not disclose your personal data to third parties.

We might offer our visitors the opportunity to subscribe to a newsletter. When subscribing, personal data such as name, surname, address, email address, and phone number is collected.

We regularly inform subscribers about [newsletter topic] in our newsletter. The newsletter can only be received if the person has a valid email address and has registered for the newsletter.

The collected data will only be used for sending the newsletter. The subscription can be revoked at any time. Each newsletter contains a link to unsubscribe.

The data collected through the newsletter service will not be shared with third parties.

Our website uses components from LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA, for building and maintaining business contacts. For data protection matters outside the USA, LinkedIn Ireland is responsible.

When you visit a page with LinkedIn components, your browser loads content from LinkedIn servers. In doing so, LinkedIn learns which pages you visit. If you are logged into LinkedIn, your visit is directly linked to your account. This happens regardless of whether you click the component or not.

To prevent this, log out of your LinkedIn account before visiting our website.

You can manage your email, SMS, and advertisement settings under LinkedIn Guest Controls.

Information on LinkedIn’s use of cookies can be found in their Cookie Policy. More details about data protection are available in LinkedIn’s Privacy Policy.

Contact

If you have any questions or complaints about our privacy policy or would like to provide suggestions to improve our data protection practices, please contact us by email at leonardo@lemacapitalch.com.