

# Novastone Capital Advisors – Privacy Policy

## 1. Introduction

Novastone Capital Advisors GmbH ("NCA") values your privacy. This Privacy Policy demonstrates our commitment to ensure the privacy and the confidentiality of your personal data or personal data of other individuals you provide to us ("**Personal Data**") when you use our website, request our services or communicate with us.

By accessing our website, using our services and/or communicating with us via the contact form on our website, email or other channels, you consent to this Privacy Policy. To the extent you provide us with Personal Data of individuals other than yourself, you assure us that such individuals have consented to and been provided with a copy of this Privacy Policy. In case you should not agree to any part of this Privacy Policy, you must inform us and discontinue using our website and services. We shall then no longer be in a position to provide any further information or services to you.

## 2. Personal Data we collect

We only collect the Personal Data you provide to us when communicating with us or when requesting our services (such as your name, contact details, profession and title, gender, pictures, languages, business affiliations, education and professional experience, any of the foregoing in relation to persons writing a letter of reference for you, any information you provide to us when applying to NCA, including, country of residence, citizenship, financial records, educational certificates, passport copies and work permits, and content of the communication).

In some instances, the Personal Data will be supplemented by information retrieved from public sources, such as online media or employer websites, for the purpose of confirming your current professional position or obtaining further information to enable us to effectively communicate with you and offer our services to you.

## 3. Purposes for processing your Personal Data

We use Personal Data for the purposes of managing our relationship with you and providing our services to you, as well as communicating with you, including to send you newsletters, articles, publications and invitations to events, to conduct interviews, training programmes, profile preparations and presentations, to maintain our list of contacts and/or to provide you with other information you may request from us.

Your Personal Data will only be used by us, our external advisory representatives, service providers of our business partners, potential investors of NCA Entrepreneurship through Acquisition program (NCA EtA program) and our technology suppliers (who are all obliged to protect your Personal Data to the same extent as we are). We do not sell or otherwise transfer your Personal Data to third parties

except with your prior consent or as we are required under applicable law or regulation. We do not monitor your behaviour, track your physical location or subject you to automated individual decision-making.

#### **4. Cookies**

Cookies are small pieces of text sent to your browser or downloaded to your device when you visit a website. They serve a variety of functions, like enabling us to remember certain information you provide to us as you navigate between our pages, the number of visitors to the website and similar statistical information. You can set your browser to not accept cookies (opt out), but this may limit your ability to use our website. Unless you opt-out, we may use cookies for the following purpose:

As most websites we may use cookies, to improve the use of the website with your help, e.g. by gathering anonymous data about your visit to our website to, for example, be able to determine the total quantity of users of the website.

##### Google Analytics

The website uses Google Analytics, a web analysis service of Google Inc. ("Google"). Google Analytics uses cookies to enable analysis of the use of the website. The information created by cookies about the use of this website by the users is ordinarily transmitted to a Google server in the USA or a different state outside of the EU and saved there.

The following data is collected by Google Analytics: IP address, browser, device type, device model, state, service provider, screen resolution, length of stay on the Website, language, operating system, and visited pages on the Website. Google will use this information to evaluate your use of the Website and create reports about the Website activities for us.

You can also prevent the placement of cookies through the settings of your browser or by downloading and installing the browser plug-in available at the following link:

<https://tools.google.com/dlpage/gaoptout?hl=en>

#### **5. Our basis for processing your Personal Data**

When processing your Personal Data for the purposes described herein, we rely on your consent to this Privacy Policy, our legitimate interests in maintaining business-relationships and communicating with you and/or our performance of any contract or another ground for lawful processing of your Personal Data under the applicable laws and regulations.

## **6. Protecting your Personal Data**

We restrict the use and access to your Personal Data to those who have an absolute need-to-know to provide you with our services or access to our website and/or to communicate with you. We maintain appropriate technical and organizational measures to help protect your Personal Data from unauthorized access, disclosure, modification, loss or destruction in accordance with applicable data protection and security laws.

We use and share your Personal Data with Recruiterflow, Inc, Zoho Corporation Pvt. Ltd and Microsoft Inc as our suppliers, which may store your Personal Data in the U.S. and with which NCA has a data processing agreement in place. Both companies are duly certified with the Swiss-U.S. and EU-U.S. privacy shield.

Any other transfer of your Personal Data outside the EEA and Switzerland (i.e. to the U.S.) is conducted in accordance with data processing agreements for which NCA uses the EU Standard Contractual Clauses approved by the EU Commission which may be read [here](#), as adapted to satisfy Swiss law requirements.

## **7. Your choices and rights**

We grant you all individual data protection rights as per the European Union's General Data Protection Regulation (GDPR), as applicable:

In particular, to the extent provided by applicable data protection legislation, you have the right to:

- be informed by us on any processing of your Personal Data to verify the lawfulness of processing (*right of access*);
- request rectification or completion of any relevant data where you are affected by incorrect or incomplete Personal Data (*right to rectification*);
- request the deletion of your Personal Data (*right to erasure*) or a temporary restriction of processing in certain instances (*right to restriction of processing*);
- object to the processing of your Personal Data (*right to object*);
- receive your Personal Data in a structured, commonly used and machine-readable format or have your Personal Data transferred to another data controller, where our processing is based on your consent or necessary for the performance of a contract with you and carried out by automated means (*right to data portability*).

To the extent we process your Personal Data based on your consent, you also have the right to withdraw your consent, without affecting the lawfulness of our processing based on your consent before its withdrawal (*right to withdrawal of consent*), upon which withdrawal we shall no longer be in a position to provide any information or services to you.

## **8. Retaining your Personal Data**

We store your Personal Data from applications only for as long as necessary to provide you with our services, your Personal Data from communications for as long as you are a business contact to us, and

any Personal Data for as long as required by applicable laws or regulations or best practice retention requirements. You may request from NCA deletion of your Personal Data at any time. Such deletion request results in respective Personal Data being removed from NCA's systems, unless retention is required by applicable laws or regulations. By consequence, your application data will no longer be retrievable, and your placement can no longer be pursued.

## **9. Contacts**

In case you are dissatisfied with any aspect of processing of your Personal Data, we would like to understand how we can remedy the issue. Please contact us at [info@novastone-ca.com](mailto:info@novastone-ca.com) or at our address:

Novastone Capital Advisors GmbH  
Haldenstrasse 5  
6340 Baar  
Switzerland

If you would like to contact our EU representative, please send us an email at [info@novastone-ca.com](mailto:info@novastone-ca.com) and we will provide you with the detailed contact information.

You also have the right to contact the data protection supervisory authority in your country of residence.