

IMT Gruppe

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DATA PROTECTION INFORMATION FOR EMPLOYEES AND JOB APPLICANTS

In accordance with the EU General Data Protection Regulation and the FL Data Protection Act

Version: July 21, 2025

Preamble

The following data protection information applies to all employees of the following group companies of the IMT Group (hereinafter referred to as "IMT", "we", or "us") as well as to job applicants:

- IMT Financial Advisors AG, Vaduz,
- IMT Trust Services AG, Vaduz,
- IMT Tax Advisors AG, Vaduz,
- IMT Asset Management AG, Vaduz,
- KIWAL Wirtschaftstreuhand AG, Vaduz,
- Kieber Nuener Struth – Attorneys at Law, Vaduz,

This notice concerns the processing of personal employee data by IMT and the resulting rights in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation, hereafter "EU GDPR"), as well as the Liechtenstein Data Protection Act ("DSG"), in the currently valid version.

The EU GDPR entered into force in Liechtenstein on 20 July 2018. It protects the right to personal data protection as a fundamental right and freedom of individuals. In this context, extended information obligations apply. Accordingly, and in fulfilment of this obligation, we hereby inform you about the data processing we carry out. Please note that this refers to processing activities already in place, and that no changes to the employment relationship are being made.

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1. General Data Processing within the Employment Relationship

As part of your employment, we process both data you provide (e.g. application documents including name, address, telephone number, date of birth, marital status, religion, photograph, CV, qualifications, work history, training, references, interests, etc.) and data that arises during your employment (e.g. information on dependants, contract details, salary and bank details, health data, insurance and tax data, working hours and holiday entitlements, sickness absence, parental leave, maternity leave, garnishments, criminal record data, emergency contacts, and similar).

Processing is carried out for recruitment (applicant management) and human resources administration (e.g. personnel development, timekeeping, payroll, social security, training, etc.), as well as for the use of information and communication technologies ("ICT"). This includes fulfilling regulatory, legal, and social security obligations and may involve the creation and storage of automated text documents (e.g. correspondence).

AI tools may also be used, in compliance with applicable laws. These tools may automate tasks, translate languages, analyse documents or text, identify patterns, make predictions, or assist in decision-making.

Data may be shared, in accordance with legal or contractual provisions, with:

- Company Management

- Human resources (including payroll)
- Social security and health insurers
- Tax authorities
- Auditors and regulators
- Employees
- Training and education providers
- Customers, service providers, third parties, and applicants

2. Data Processing for the Management and Operation of ICT Systems

To manage and operate ICT systems, we process data such as building access control records, user authorisations (e.g. computer login names), allocation of hardware/software to you as an user, and data necessary for the secure and effective operation of IMT's ICT infrastructure. This includes automatically generated and stored documents (e.g. correspondence). Without such processing, the secure functioning of our ICT systems—and therefore employment with IMT—would not be possible.

3. Internal Data Processing and Publication

For internal contact purposes, professional and availability data (e.g. presence/absence, electronic directory, call forwarding, time records) is processed and shared within the organisation.

Our telephone systems may include call recording functions. In certain cases, recording is mandatory due to regulatory obligations and is conducted in compliance with applicable laws.

Employee email accounts and the data they contain remain the property of IMT and may be retained following the employee's departure, at IMT's sole discretion and with regard to the company's legitimate business interests. These emails and associated data may continue to be processed by IMT. Upon leaving, employees may request to transfer such data to a private device under IMT supervision.

4. Publication of Professional Contact Details

To enable contact with clients and business partners, your professional contact and profile data (e.g. qualifications, language skills) and photographs may be published on our websites (www.imt.li and/or www.kns-law.li). This is done in our legitimate interest in ensuring smooth business operations and for promotional and informational purposes.

Such publication is subject to your explicit consent, which can be withdrawn at any time without explanation.

Professional data may also be shared with clients, service providers, authorities, and third parties in the course of your duties. This is essential for the proper operation of our business and employment within the organisation.

5. Data Processing in the Event of Labour Disputes

In the event of a legal dispute during or after your employment, we may share necessary data with mediators, legal representatives (including external counsel), and courts for the purpose of appropriate legal action.

6. Processing of Voluntary Information – Consent

The provision of certain personal data—such as health information, sexual orientation (e.g. disclosed in medical certificates), ethnicity, religious affiliation, and other information (e.g. application files, criminal records)—is voluntary and based on your consent. Criminal record extracts are required as proof of compliance with professional due diligence obligations. Your consent will include the processing of emergency contact details and the publishing photographs on company websites.

The publication of your birthday details in the IMT Group's business premises (break rooms) is intended to give colleagues the opportunity to congratulate you and to strengthen social contact between employees. This publication is voluntary and can be revoked at any time.

All consents can be revoked individually and at any time without providing reasons. Revocation means that your data will no longer be used for these purposes from the date of revocation, and any resulting rights or benefits will cease. Please contact the IMT Data Protection Officer to revoke your consent.

Some data is processed automatically and shared with external ICT providers acting as processors. Data processing agreements are in place with these providers to ensure data protection compliance.

7. Data Processing Outside the EU/EEA

Your data is in general not processed outside the EU or EEA. Should this change, and the country concerned lacks an adequate level of data protection, you will be informed separately.

An adequate level of data protection may be ensured by:

- An adequacy decision by the European Commission (Art. 45 EU GDPR)
- Binding corporate rules (Art. 47 in conjunction with Art. 46 para. (2) (b) EU GDPR)
- Standard data protection clauses (Art. 46 para. (2) (c) and (d))
- Approved code of conduct (Art. 46 para. (2) (e) and Art. 40)
- Approved certification mechanisms (Art. 46 para. (2) (f) and Art. 42)
- Contractual clauses approved by the data protection authority (Art. 46 para. (3) (a))
- Exceptions for specific or individual cases (Art. 49 para. (1) and subparagraph 2)

Please note that any data and photos published on www.imt.li or www.kns-law.li may be accessed worldwide, irrespective of the data protection level in other countries. Once published online, it is not possible to fully withdraw or delete the information.

8. Retention Period

Your data will be stored in accordance with applicable retention requirements and/or for the duration of any enforceable legal claims.

9. Your Rights

You have the right to:

- Access your data
- Request corrections
- Request deletion or restriction
- Data portability
- Object to processing

Data Protection Officer, IMT Group

Lic. iur. Roland Sax

Austrasse 56, 9490 Vaduz

Email: datenschutzbeauftragter@imt.li

If you believe your data has been processed unlawfully, you may lodge a complaint with the Liechtenstein Data Protection Authority:

Datenschutzstelle Liechtenstein
Kirchstrasse 8
FL-9490 Vaduz
Telefon-Nr. + 423 236 60 90
E-Mail: info.dss@llv.li

10. Amendments

We reserve the right to update this privacy policy in line with legal developments or recommendations from the Data Protection Authority.