



## General Data Protection Regulation (“GDPR”)

### Private Policy

This Privacy Policy (the “Policy”) describes how Portas Capital collects, uses and shares the information you provide to us and the information we collect in the course of operating our business and our website.

In this Policy when we refer to Portas Capital or “we”/“us”/“our”, we mean Portas Capital Ltd. Portas Capital’s contact address is Kreuzstrasse 82, 8032 Zurich, Switzerland, or Kronenplatz 1, 8953 Dietikon, Switzerland and we are authorised and regulated (DUFİ) in Switzerland by the Swiss Financial Market Supervisory Authority FINMA.

We may revise this Policy at any time by amending this page.



## **The information that we collect and where we get it from**

“Personal information” is any information that can be used to identify you or that we can link to you and which we have in our possession or control.

We will collect and process the following personal information about you:  
Information that you provide to us.

We will process personal information that you give to us including when you email us or contact us through various channels as follows:

**Accessing our website:** In accessing our website, the information that you provide may include your full name, title, telephone number, geographical location, email address and content, date and time of your email correspondence and information about your employer or your business.

**Contacting our team members of the company:** When contacting us to obtain information about services or our firm, we are required to obtain certain personal information as outlined above to meet regulatory obligations in relation to client classification and know your customer requirements.



## How we use the information we collect

We may do the following with your personal information:

- use it to engage in marketing and business development activity in relation to services. This may include sending you monthly newsletters, updated documents, monthly outlooks, marketing communications and other information in relation to the Portas Capital services that may be of interest to you
- to comply with legal and regulatory obligations that we have to discharge
- record and monitor the use of our website or our other services for our business purposes which may include analysis of usage, measurement of site performance and generation of marketing reports
- use it for our legitimate business interests, such as undertaking business research and analysis, managing the operation of our website and our business
- use it to look into any complaints or queries you may have, and
- use it to prevent and respond to actual or potential fraud or illegal activities.

Also, we may collate, process and share any statistics based on an aggregation of information held by us provided that any individual is not identified from the resulting analysis and the collation, processing and dissemination of such information is permitted by law.



## Grounds for using your personal information

We rely on the following legal grounds to process your personal information, namely:

- Consent – we may (but usually do not) need your consent to use your personal information. You can withdraw your consent by contacting us (see below).
- Performance of a contract – we may need to collect and use your personal information to enter into a contract with you or to perform our obligations under a contract with you.
- Legitimate interest – we may use your personal information for our legitimate interests, some examples of which are given above.
- Compliance with law or regulation – we may use your personal information as necessary to comply with applicable law/regulation.



## How we share information with third parties

We may share your personal information outside the Firm. This may include:

- Third party agents/suppliers or contractors, bound by obligations of confidentiality, in connection with the processing of your personal information for the purposes described in this Policy. This may include, but is not limited to, IT and communications service providers.
- Third parties relevant to the regulated services that we provide. This may include, but is not limited to, counterparties to transactions or litigation, regulators, authorities, governmental institutions and stock exchanges.
- To the extent required by law, regulation or court order, for example, if we are under a duty to disclose your personal information in order to comply with any legal obligation.

Where we transfer your personal information outside Europe, we will ensure that it is protected and transferred in a manner consistent with legal requirements applicable to the information. This can be done in a number of different ways, for instance:

- the country to which we send the personal information may be approved by the European Commission.
- the recipient may have signed a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal information, or
- where the recipient is located in the US, it may be a certified member of the EU-US Privacy Shield scheme.

In other circumstances, the law may permit us to otherwise transfer your personal information outside Europe. In all cases, however, any transfer of your personal information will be compliant with applicable data protection law.



## **Keeping your information and information security**

How long we hold your personal information for will vary and will depend principally on:

- the purpose for which we are using your personal information – we will need to keep the information for as long as is necessary for the relevant purpose, and
- legal obligations – laws or regulation may set a minimum period for which we have to keep your personal information.

We will ensure that the personal information that we hold is subject to appropriate security measures.



## Your choices and rights

You have a number of legal rights in relation to the personal information that we hold about you and you can exercise your rights by contacting us using the details set out below.

These rights include:

- Obtaining information regarding the processing of your personal information and access to the personal information which we hold about you.
- Please note that there may be circumstances in which we are entitled to refuse requests for access to copies of personal information.
- Requesting that we correct your personal information if it is inaccurate or incomplete.
- Requesting that we erase your personal information in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal information but we are obliged under regulation to retain it.
- Objecting to, and requesting that we restrict, our processing of your personal information in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal information but we are legally or regulatory entitled to refuse that request.
- In some circumstances, receiving some personal information in a structured, commonly used and machine-readable format and/or requesting that we transmit those information to a third party where this is technically feasible. Please note that this right only applies to personal information which you have provided to us.
- Withdrawing your consent, although in certain circumstances it may be lawful for us to continue processing without your consent if we have another legitimate reason (other than consent) for doing so.
- Lodging a complaint with the relevant data protection authority, if you think that any of your rights have been infringed by us.
- We can, on request, tell you which data protection authority is relevant to the processing of your personal information

If you would like further information on the collection, use, disclosure or processing of your personal information or the exercise of any of the rights listed above, please contact your client advisor or write us at [info@portascapital.com](mailto:info@portascapital.com)