CO|ONE DATA PROTECTION

Privacy Policy

Website and investor portal | Issued by Bespoke AG

Effective date: 26 February 2026
Version: 1.0
Controller: Bespoke AG, company number FL-0002.751.631-8
Address: Buchenweg 6, 9490 Vaduz, Principality of Liechtenstein
Contact: hello@the-co-one.com

1. Controller

Bespoke AG
Buchenweg 6
9490 Vaduz
Principality of Liechtenstein

Contact

e-Mail: hello@the-co-one.com

Bespoke AG is the controller within the meaning of the General Data Protection Regulation (EU) 2016/679 (GDPR) as well as the applicable data protection provisions of the Principality of Liechtenstein

2. Use of Google Analytics

On our website and in the investor portal, we use Google Analytics, a web analytics service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

- Purpose: Analysis of user behavior to optimize our offering and the investor portal.
- Legal basis: Art. 6 para. 1 lit. a GDPR (consent).
- Functionality: Google Analytics uses cookies. We use IP anonymization so that your IP address is truncated within the EEA.
- Third-country transfer: A transfer to the USA may take place. Google is certified under the EU-US Data Privacy Framework or standard contractual clauses are used.
- Withdrawal: Consent can be withdrawn at any time via the cookie settings or appropriate browser add-ons.

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3. Use of HubSpot (Contact Forms)

For our online marketing activities and for processing inquiries via forms on this website, we use the service HubSpot of HubSpot Inc. (25 First Street, 2nd Floor, Cambridge, MA 02141, USA) with a branch in Ireland (HubSpot, 2nd Floor 30 North Wall Quay, Dublin 1, Ireland).

- Purpose: We integrate HubSpot into our contact forms in order to process your inquiries efficiently, manage customer service, and provide you with requested information.
- Legal basis: Processing is carried out on the basis of Art. 6 para. 1 lit. a GDPR (consent), insofar as you actively complete and submit the form, and on the basis of Art. 6 para. 1 lit. f GDPR (legitimate interest) in efficient customer support.
- Data storage: The data you enter into the forms (e.g. name, email address, content of the inquiry) are stored on HubSpot's servers.
- Third-country transfer: HubSpot may store data in the USA. The transfer is carried out on the basis of the EU-US Data Privacy Framework or by means of the European Commission's standard contractual clauses.
- Withdrawal: You may withdraw your consent to the storage of your data at any time with effect for the future (e.g. by email to hello@the-co-one.com). The data will be deleted as soon as they are no longer required for the purpose for which they were collected.

4. Categories of Personal Data and Cookies

Bespoke AG processes in particular:

- Identification data: name, date of birth, nationality.
- Contact and communication data: address, email, telephone number.
- Identification and KYC data: copies of identification documents, proof of residence, information on the beneficial owner as well as proof of source of funds.
- Contract and participation data: number/class of participation certificates pursuant to Art. 304 et seq. PGR.
- Payment data: IBAN, BIC, account holder, payment references.
- Technical usage data: IP address, date/time of access, log files, device information.

Cookies: We use technically necessary cookies (Art. 6 para. 1 lit. f GDPR) as well as optional analytics cookies (only with consent pursuant to Art. 6 para. 1 lit. a GDPR).

5. Purposes and Legal Bases of Processing

Processing is carried out for the following purposes:

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- Performance of contract (Art. 6 para. 1 lit. b GDPR): registration, subscription and processing of participations.
- Legal obligations (Art. 6 para. 1 lit. c GDPR in conjunction with the SPG): identity verification and prevention of money laundering in accordance with the Liechtenstein Due Diligence Act.
- Corporate law obligations (PGR): maintenance of the register of participants.
- Legitimate interests (Art. 6 para. 1 lit. f GDPR): IT security, support and prevention of misuse.

6. Obligation to Provide Data

Within the scope of our business relationship, you must provide those data that are necessary for the initiation and execution of the participation as well as for the fulfillment of statutory due diligence obligations (KYC). Without these data, we cannot conclude a contract with you or continue an existing business relationship.

7. Disclosure of Data to Third Parties

Data are only disclosed to necessary recipients:

- IT, CRM and hosting service providers.
- Identity and compliance service providers (KYC/AML).
- Payment and banking institutions.
- Authorities (e.g. FMA, FIU) in the event of a legal obligation.

All processors are contractually bound in accordance with Art. 28 GDPR.

8. Third-Country Transfers

A transfer to countries outside the EEA shall only take place if there is an adequacy decision by the European Commission or appropriate safeguards are provided (e.g. standard contractual clauses pursuant to Art. 46 GDPR).

9. Storage Period

Personal data are deleted as soon as the purpose ceases to apply. Due to the Liechtenstein SPG and the PGR, there is generally a statutory retention obligation of 10 years for business-relevant documents.

10. Rights of Data Subjects

Data subjects have in particular the following rights:

- Right of access (Art. 15 GDPR).
- Right to rectification (Art. 16 GDPR).

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- Right to erasure (Art. 17 GDPR).
- Right to restriction of processing (Art. 18 GDPR).
- Right to data portability (Art. 20 GDPR).
- Right to object (Art. 21 GDPR).

Requests may be addressed at any time to the contact address stated above.

If processing is based on your consent, you may withdraw this consent at any time with effect for the future.

Please address requests to the address under point 1.

11. Right to Lodge a Complaint

You have the right to lodge a complaint with the Data Protection Authority of the Principality of Liechtenstein (DSS).

12. Data Security

To protect your data, this website uses SSL or TLS encryption. We also implement appropriate technical and organizational measures (TOM) in accordance with Art. 32 GDPR, in particular to protect the register of participants against unauthorized access (password protected).

13. Data Collection from Third Parties

If, by way of exception, data are not collected directly from you, information will be provided in accordance with Art. 14 GDPR.

14. Amendments

The version currently published on the website shall apply.

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