

Last Updated 21 September, 2021

This Privacy Policy explains how we use the Personal Data that Altmayer Fine Violins LLP collects or generates in relation to our Website and interactions with individuals and third parties.

The list below sets out what is covered in this Privacy Policy.

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## **1. BACKGROUND**

1.1 We do not collect Personal Data, such as names and addresses, when you visit our Website. Should you decide to send us any Personal Data via email or other communications with us, we will collect and use such Personal Data in accordance with this Privacy Policy. Altmayer Fine Violins is responsible for ensuring that it uses that Personal Data in compliance with data protection laws. We also collect some limited Personal Data through other means, for example from publicly available sources and through third parties.

1.2 At Altmayer Fine Violins, we respect privacy and we are committed to keeping all your Personal Data secure. This Privacy Policy governs the handling of Personal Data by Altmayer Fine Violins in connection with our Website and other interactions and communications with us.

1.3 We use the following definitions in this Privacy Policy:

**“Altmayer Fine Violins”, “we” or “us”** means Altmayer Fine Violins LLP, a limited liability partnership registered in Delaware with Account No. 9402158923.

**“Personal Data”** means any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked with, directly or indirectly, a particular living individual or household of living individuals and other personal information which is in the possession of, or is likely to come into the possession of, Altmayer Fine Violins. In addition to factual information, it includes any expression of opinion about an individual and any indication of the intentions of Altmayer Fine Violins or any other person in respect of an individual.

**“Website”** means [www.altmayerfineviolins.com](http://www.altmayerfineviolins.com).

## 2. THE TYPES OF PERSONAL DATA WE COLLECT

2.1 In relation to the use of our Website and other communications and interactions with us, we may collect and process the following Personal Data about you:

- **Information that you provide to Altmayer Fine Violins.** This includes information about you that you give to us by filling in forms or by communicating with us, whether face-to-face, by phone, e-mail or otherwise. Such information may include (by way of a non-exhaustive list):
  - your name, postal address, e-mail address, telephone number and any other business contact details; and
  - records and copies of your correspondence with us, if you contact us.
- **Information that we collect or generate about you.** This includes (by way of non-exhaustive list):
  - a file with your contact history to be used for enquiry purposes so that we may ensure that you are satisfied with the responses which we have provided to you;
  - certain information that is provided by the cookies that we use;
  - details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website;
  - information about your computer and internet connection, including your IP address, operating system, browser type, etc.; and
  - other information you or others may provide to us during your communications or relationship with us.
- **Information we obtain from other sources.** This includes limited publicly available information we collect directly or indirectly. We also collect some data from third party vendors.
- **Anonymized data.** In addition to the categories of Personal Data described above, Altmayer Fine Violins may also process anonymized information and data that is not processed by reference to a specific individual.

## 3. HOW WE USE YOUR INFORMATION

3.1 Your Personal Data may be stored and processed by us in the following ways and for the following purposes:

- to allow you to use and access the functionality provided by the Website;
- in order to respond to your queries and to provide you with Altmayer Fine Violins products and/or services or information about them upon your request;
- for in-depth threat analysis;
- for in-depth statistical report about Website usage;

- in order to comply with, and in order to assess compliance with, applicable laws, rules and regulations;
- for business analysis and development of products and services;
- for the administration and maintenance of databases storing Personal Data; or
- for our general operational or business purposes.

3.2 We use Personal Data for a variety of reasons. These include:

- we may need to do so in order to perform our contractual obligations with customers and other third parties;
- we may have legal and regulatory obligations that we have to discharge;
- we may need to do so in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
- the use of your Personal Data as described may be necessary for our legitimate business interests, such as:
  - allowing us to effectively and efficiently manage and administer the operation of our business (including our Website);
  - monitoring the use of our copyrighted materials;
  - monitoring Website usage;
  - responding to correspondence that we receive via our Website;
  - enabling quick and easy access to information on Altmayer Fine Violins products and services; and
  - maintaining the security of our networks, IT systems and physical premises.

3.3 We collect and process personal data about our suppliers, vendors (including trading counterparties) and their representatives in order to manage the relationship, contract, and to receive services from them.

3.4 We take steps to ensure that the Personal Data is accessed only by employees of Altmayer Fine Violins and its affiliates that have a need to do so for the purposes described in this Privacy Policy.

#### **4. DISCLOSURE OF YOUR INFORMATION TO THIRD PARTIES**

4.1 We may share your Personal Data within the group of Altmayer Fine Violins affiliate companies for the purposes described above.

4.2 We may also share your Personal Data outside the group of Altmayer Fine Violins affiliate companies for the following purposes:

- with our business partners. For example, this could include our partners from whom you or your company or organisation purchased Altmayer Fine Violins products or services. We take steps to

ensure that Personal Data is only transferred to business partners that are contractually obliged to comply with appropriate data protection obligations and the relevant privacy and confidentiality legislation;

- with third party agents and contractors for the purposes of providing services to us (for example, Altmayer Fine Violins’s professional advisors, and IT and communications providers). We take steps to ensure these third parties are contractually obliged to comply with appropriate data protection obligations and to only use your Personal Data as described in this Privacy Policy;
- to the extent required by law, for example, if we are under a duty to disclose your Personal Data in order to comply with any legal obligation, or to establish, exercise or defend our legal rights;
- if we sell our business or assets, in which case we may need to disclose your Personal Data to the prospective buyer for due diligence purposes; and
- if we are acquired by a third party, in which case the Personal Data held by us about you will be disclosed to the third party buyer.

## **5. INTERNATIONAL TRANSFERS OF PERSONAL DATA**

5.1 Altmayer Fine Violins is a global business. Our customers and our operations are spread around the world. As a result, we collect and transfer Personal Data on a global basis. That means that we may transfer your Personal Data to locations outside of your country.

5.2 Where we transfer your Personal Data across jurisdictions, we take steps to ensure that it is protected and transferred in a manner consistent with legal requirements. In relation to data being transferred outside of Europe, for example, this may be done in one of the following ways:

- the country that we send the data to might be approved by the European Commission as offering an adequate level of protection for Personal Data;
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your Personal Data; or
- in other circumstances, the law may permit us to otherwise transfer your Personal Data outside Europe.

5.3 You can obtain more details of the protection given to your Personal Data when it is transferred outside Europe (including a copy of the standard data protection clauses which we have entered into with recipients of your Personal Data, if applicable) by contacting us as described in section 10 below.

## **6. HOW WE SAFEGUARD YOUR INFORMATION**

6.1 We have certain controls in place designed to maintain the security of our information and information systems, including controls designed to protect Personal Data with safeguards according to the sensitivity of the relevant information and controls (such as restricted access) placed on our computer systems. We take steps to ensure physical access to areas where Personal Data is gathered, processed or stored is limited to authorised employees.

6.2 As a condition of employment, Altmayer Fine Violins employees are required to follow all applicable laws and regulations, including in relation to data protection. We take steps to ensure access to Personal Data is limited to those employees and affiliates' employees who need it to perform their roles. Unauthorised use or disclosure of confidential client information by a Altmayer Fine Violins employee or affiliate's employee is prohibited and may result in disciplinary measures.

6.3 When you contact a Altmayer Fine Violins employee about your file, you may be asked for some Personal Data. This type of safeguard is designed to ensure that only you, or someone authorised by you, has access to your file.

6.4 Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

## **7. HOW LONG WE KEEP YOUR PERSONAL DATA**

7.1 How long we will hold your Personal Data for will vary and will be determined by the following criteria:

- the purpose for which we are using it – Altmayer Fine Violins will need to keep the data for as long as is necessary for that purpose; and
- legal obligations – laws or regulation may set a minimum period for which we have to keep your Personal Data.

## **8. YOUR RIGHTS**

8.1 In certain of the above cases in which we collect, use or store your Personal Data, you may have the following rights and, in most cases, you can exercise them free of charge. These rights include:

- the right to obtain information regarding the processing of your Personal Data and access to the Personal Data which we hold about you;
- the right to withdraw your consent to the processing of your Personal Data at any time. Please note, however, that we may still be entitled to process your Personal Data if we have another legitimate reason for doing so. For example, we may need to retain Personal Data to comply with a legal obligation;
- in some circumstances, the right to receive some Personal Data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to Personal Data which you have provided directly to Altmayer Fine Violins;
- the right to request that we rectify your Personal Data if it is inaccurate or incomplete;
- the right to request that we erase your Personal Data in certain circumstances. Please note that there may be circumstances where you ask us to erase your Personal Data but we are legally entitled to retain it;

- the right to object to, or request that we restrict, our processing of your Personal Data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your Personal Data but we are legally entitled to refuse that request;
- the right to object to the use of your Personal Data for direct marketing purposes; and
- the right to lodge a complaint with the relevant data protection regulator if you think that any of your rights have been infringed by us.

8.2 You can exercise your rights by contacting us using the details listed in section 10 below.

8.3 Your California Privacy Rights. California Civil Code Section 1798.83 permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [saltmayer@altmayerfineviolins.com](mailto:saltmayer@altmayerfineviolins.com).

## **9. DESIGNATED REPRESENTATIVE**

9.1 Altmayer Fine Violins's registered office and designated representative in the EU may be contacted at [saltmayer@altmayerfineviolins.com](mailto:saltmayer@altmayerfineviolins.com).

## **10. QUESTIONS AND CONCERNS**

10.1 If you have any questions or concerns about Altmayer Fine Violins's handling of your Personal Data, or about this Privacy Policy, please contact our Data Protection Team at [saltmayer@altmayerfineviolins.com](mailto:saltmayer@altmayerfineviolins.com).

10.2 We are usually able to resolve privacy questions or concerns promptly and effectively. If you are not satisfied with the response you receive from our Data Protection Team, you may escalate concerns to the applicable privacy regulator in your jurisdiction. Upon request, Altmayer Fine Violins's Data Protection Team will provide you with the contact information for that regulator.