



DATA PROTECTION INFORMATION FOR ROBOMARKETS DEUTSCHLAND

 **RoboMarkets**

ROBOMARKETS DEUTSCHLAND GMBH
Bleidenstraße 1,
60311, Frankfurt am Main



ROBOMARKETS GERMANY GMBH

Bleidenstraße 1, 60311,
Frankfurt am Main

Data protection information for RoboMarkets Deutschland GmbH

RoboMarkets Deutschland GmbH ("RoboMarkets") provides services in the business sector and ensures each client's privacy and optimal data security. As a financial services institution, RoboMarkets is subject to the data protection regulations of the General Data Protection Regulation (GDPR), the Federal Data Protection Act (BDSG), and any other relevant data protection regulations. This data protection information applies to all existing, former, and prospective clients.

SCOPE AND DEFINITIONS

This data protection information applies to the processing of personal data when visiting and using the RoboMarkets website at www.robomarkets.de, including all subpages (together referred to as the "Website").

Insofar as we use links to refer to other websites or online offers of other companies and entities, our data protection information does not apply to processing personal data on those other websites or online offerings.

The terms used (e.g., "personal data", "processing" or "controller"), are as defined in Art. 4 of the GDPR.

RESPONSIBLE PARTY AND DATA PROTECTION OFFICER

The entity responsible for the processing of personal data on the website, within the meaning of Art. 4 No. 7 GDPR, is:

RoboMarkets Germany GmbH

Bleidenstrasse 1

60311 Frankfurt am Main

www.robomarkets.de

info@robomarkets.de

+49 69 96 75 81 20

For all relevant rights, questions, or complaints regarding data protection matters between you and the Company, please get in touch with our Data Protection Officer at datenschutz@robomarkets.de or +49 69 870088584.

WHO PROCESSES THE PERSONAL DATA?

RoboMarkets processes personal data if you have consented to share it with us before using the website or if there is another legal basis for the processing.

Please note that we may use service providers with whom we have entered into data processing agreements to process personal data. You can find more information on this below. If data processing is conducted by processors in a third country (outside the EU/EEA), we ensure that the level of protection for personal data guaranteed by the GDPR is maintained (Art. 44 et seq. GDPR).

All data we collect and process will be used solely for the predetermined, explicit, and legitimate purposes of improving the quality of service, informing you about new RoboMarkets services and products, assessing your financial capabilities and needs, and executing transactions.

Personal data is processed only by those who need to know about it. This data may be provided directly by you or sourced from the following:



- Publications/databases provided by authorities (e.g., the Federal Gazette)
- Corporate clients or service providers of RoboMarkets
- Third parties, such as credit reference agencies and fraud prevention pools, or data brokers used in compliance with data protection regulations
- Websites/social media pages with information published by you for the purposes mentioned above (e.g., your website or social media page)
- Databases made publicly accessible by third parties

WHAT CATEGORIES OF PERSONAL DATA DO WE PROCESS?

We process personal data in the following categories:

Identity data: your first, middle, and last name; your username or any other identifier you create when using our services; your proof of identity in a digital image form; your date and place of birth; your gender; your country of residence; and your nationality.

Contact details: your residential address, including proof of this address in a digital image form; your phone number and email address.

Professional data: education level, occupation, name of employer, relevant experience in online trading, knowledge of online trading and associated risks, including any relevant evidence for this data.

Financial and tax data: annual and monthly income; net income; tax identification number and country of tax residence; bank details and account statements; bank card numbers and proof of ownership; details of electronic payment methods (wallets); and source of funds.

Technical usage data: your IP address and location, browser type and version, device type and model, operating system; and any other data relating to the characteristics of the device you use to access and use our website.

Behavioral data: all data relating to your usage behavior on our website – user interactions such as link clicks, file downloads, and scrolling activities.

Marketing data: includes consent to receive marketing and advertising material, the type of communication channel, and the preferred language for messaging.

WHY DO WE PROCESS YOUR PERSONAL DATA?

The purposes for collecting personal data are:

Contract initiation and conclusion: to onboard you as a client, we must request and verify your personal data in accordance with our terms and conditions.



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Legal obligations: RoboMarkets is subject to several laws that apply to financial organizations, such as the Act on the Tracing of Profits from Serious Crimes, the Banking Act, the Securities Trading Act, the Commercial Code, the GDPR, and the Fiscal Code. These laws and regulations require us to collect and store personal data.

Complaint inquiries: we use your provided data to handle your complaints.

Data analytics: we use various tools to collect behavioral and quantitative data about our website users and email subscribers to provide you with the optimal user experience and relevant content.

Application process: during the application process, we process the following categories of your personal data:

- Master data (this includes, e.g. name, gender, date of birth)
- Contact details (this includes, for example, references and CV)
- Data on professional background and acquired skills (this includes, for example, training and further education, professional experience, and additional qualifications)
- Any other data provided by you

All personal data is processed exclusively for the following purposes:

- Initiation, establishment, implementation, and termination of the business relationship
- Declarations and information based on legal obligations or that are otherwise legally permissible
- Safeguarding and enforcing our legitimate interests



The legal basis for processing your data is Art. 6 para. 1, sentence 1 points b, c, and f GDPR.

If you have provided "special categories of personal data" within the meaning of Art. 9 GDPR in your application (e.g., a photo that shows your ethnic origin or visual impairment) or information on severe disability, marital status, etc., this processing is based on your consent within the meaning of Art. 9 para. 2 point a GDPR. However, we aim to evaluate all applicants solely on their qualifications and, therefore, ask that you omit such information from your application if possible.

Marketing purposes: if you agree to receive our marketing communications, we will use your personal data to provide you with information regarding our products, services, and upcoming events.

Notifications required by law: we must notify you of changes to our products, services, or agreements. We may, therefore, use your personal data for this purpose.

TO WHOM MAY WE DISCLOSE YOUR PERSONAL DATA?

To the extent permitted by law, RoboMarkets reserves the right to disclose personal data as necessary and for the purposes set out above to:

- Affiliated companies within the meaning of §§ 15 ff. AktG
- Third-party providers for marketing and advertising
- Third-party service providers
- Subsidiaries and affiliated companies
- Governing bodies
- Auditors and contractors
- Anyone whom you have authorized

Rest assured, we will never share your personal data with third parties unknown to the Company, nor with those with whom there is no corresponding agreement or other legal basis. To offer you the best possible service and remain competitive, we occasionally exchange data within our corporate group (affiliated companies) to ensure emergency support in case of technical issues. In such cases, we ensure that the data transfer complies with data protection requirements and that your personal data is protected.

To fulfill our legal obligations, we disclose data to the relevant authorities to the extent required, e.g., to combat terrorism and prevent money laundering. In some cases, we are required by law to disclose your data to the following authorities:

- **Supervisory authorities and bodies**, such as the national banks and financial sector supervisory authorities in the countries in which we operate



- **Tax authorities** may request information about client assets or other personal data. For this purpose, we may process your identification data, such as your social security number, tax identification number, or other national identification codes per the relevant national laws
- **Judicial authorities and similar institutions**, such as the police, public prosecutors, courts, and arbitration/mediation bodies, at their express and lawful request

In all cases, we will inform you.

Transfer of data outside the European Union or the European economic area

If we process personal data in a third country (i.e. outside the European Union (EU) or the European Economic Area (EEA)) or if this occurs in the context of the use of third-party services, disclosure, or transfer of data to third parties, this will only take place if it is done to fulfill our (pre)contractual obligations, based on your consent, a legal obligation, or our legitimate interests. If there are no legal permissions, we only allow data to be processed in a third country if the specific requirements of Art. 44 et seq. GDPR are met.

YOUR RIGHTS REGARDING YOUR PERSONAL DATA

You have the following rights regarding your personal data that we collect and process:

1. Right to information per Art. 15 GDPR

You are entitled to request an overview of your personal data processed by us. For example, you can obtain a copy of the personal data we store about you.

2. Right to rectification according to Art. 16 GDPR

If your details are incorrect, you may request a correction. If your data is incomplete, you can request that it be completed. If we have passed on your data to third parties, we will inform them of your correction insofar as required by law.

3. Right to erasure according to Art. 17 GDPR

You may request the immediate deletion of your personal data for the following reasons:

- If your personal data is no longer required for the purposes for which it was collected
- If you withdraw your consent and there is no other legal basis
- If you object to the processing on conclusive grounds and there are no overriding legitimate grounds for processing
- If your personal data has been processed unlawfully
- If your personal data must be deleted to comply with legal requirements

4. Right to restrict processing according to Art. 18 GDPR

You have the right to request that the processing of your personal data be restricted for one of the following reasons:



- If you have disputed the accuracy of your personal data, and we have verified its accuracy
- If the processing is unlawful and you request a restriction of use instead of erasure
- If we no longer need your data for processing, but you need it to assert, exercise, or defend against legal claims
- If you have objected, while it is not yet clear whether your interests prevail

5. Right to data portability according to Art. 20 GDPR

You have the right to receive a copy of your data in a structured, commonly used, and transferable format and to transmit this data to other organizations. You also have the right to ask us to transfer your personal data directly to other organizations you have named. We will then transfer your personal data where this is technically feasible and permitted by applicable national law.

6. Right to object according to Art. 7 para. 3 GDPR

If we process your data based solely on legitimate interests or in the public interest, you have the right to object to the processing in certain situations. If we use your data for direct marketing or advertising activities, you can object to the processing without providing reasons. However, you cannot ask us to delete your personal data if:

- We are still legally required to store it
- This is necessary for fulfilling a contract with you

Please refer to our separate note in the "Information about your right to object" section.

7 Right to complain according to Art. 77 GDPR

If you are not satisfied with our response to your request, you have the right to file a complaint with the data protection officer at RoboMarkets Deutschland GmbH and the competent data protection supervisory authority. Details of your rights can be found in the respective provisions of the General Data Protection Regulation (Articles 15 to 22 GDPR).

The supervisory authority overseeing our operations is:

The Hessian Commissioner for Data Protection and Freedom of Information

Gustav-Stresemann-Ring 1

65189 Wiesbaden

+49 611 14 08-0

poststelle@datenschutz.hessen.de

Regarding the client's rights, the Company informs you that you may exercise the rights mentioned above, provided this does not conflict with legal provisions relating to the prevention of money laundering, terrorist financing, the Company's record-keeping obligations etc.



OBLIGATION TO PROVIDE PERSONAL DATA

As part of our business relationship, we are required to provide the following personal data from you:

- Data required for the establishment and implementation of a business relationship
- Data necessary for the fulfillment of the associated contractual obligations
- Data that we are legally obliged to collect

Without this personal data, we generally cannot enter into or execute a contract with you. Under the Money Laundering Act, we are required to verify your identity using identification documents before entering into a business relationship (e.g. by POSTIDENT procedure or video verification). Your name, place and date of birth, nationality, address, and ID data will be collected and stored. Should any changes occur during our business relationship, you are obligated to inform us immediately. If you do not provide the necessary information and documents, we may be unable to enter or continue our business relationship.

PROTECTION OF PERSONAL DATA

We take appropriate technical and organizational measures (policies and procedures, IT security, etc.) to ensure the confidentiality and integrity of your personal data and its processing. We implement an internal framework of guidelines and minimum standards throughout the Company to protect your personal data. These policies and standards are updated regularly to reflect current legislation and market developments. Additionally, RoboMarkets employees are subject to a duty of confidentiality and may not unlawfully disclose your personal data. If you believe your personal data has been misused, please get in touch with RoboMarkets so we can help safeguard it.

COOKIE POLICY

Cookies are files that contain information used by websites to track data traffic. This information from the website server is temporarily stored on the hard drive of your computer or mobile device when you first visit the website and subsequently enables the website to recognize your browser. Your choice regarding cookie use on our websites is stored in a "cookie_notification" parameter.

RoboMarkets uses cookies to determine which services are most interesting to clients and measure visitor activity on the Company's websites. Cookies also help us identify the most frequently requested advertisements and estimate the popularity of resources related to attracting potential clients.

WHAT TYPES OF COOKIES DO WE USE?

Session cookies: these cookies are only used during your session on our website and are stored only until you close your browser.

Analytical cookies: these cookies collect behavioral information about how you use our website and transmit it to our analysis software, where it may be stored for up to 6 months. The information stored does not include your name, email address, or other personal data and is, therefore, anonymous. We use it to track user activity on our websites, ensuring a seamless experience across all our platforms and identifying potential inaccuracies.



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Advertising cookies: these cookies provide relevant advertising to website visitors when they are not using our platforms. This may include third-party cookies from one or more of our advertising partners.

Functional cookies: These cookies remember your settings, i.e. the choices you make while using our website, such as language preferences or closing a pop-up window.

AMENDMENT OF THE DATA PROTECTION INFORMATION

We may amend this Privacy Notice to comply with changes in the law and/or to reflect how our Company processes personal data. We will update the revision date at the bottom of this page accordingly. However, we recommend that you review this statement regularly to stay informed about how we process and protect your personal data.

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