

Privacy policy of the user portal

These are the data protection regulations for the user portal, which is operated by Aescuvest international GmbH, Hanauer Landstr. 328-330, D-60314 Frankfurt am Main. With these data protection regulations we would like to inform you about which personal data we collect from you and how we process this data when you register and use the user portal.

With your consent to these data protection provisions, which is required for registration, you consent to the collection, processing and use of your personal data as described below, which takes place in the context of the justification, implementation and handling of your investments.

According to the Basic Data Protection Regulation (BDPIC), "personal data" shall mean any information relating to an identified or identifiable natural person (hereinafter referred to as "data subject"); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. In other words, personal information about you is information that relates to you or says something about you personally and can be associated with you, either on its own or in combination with other information. For the sake of simplicity and to make it easier to understand, we also refer briefly to "your data" in these data protection provisions when we talk about personal data about you.

The protection of your data is important to us. And this protection can only be ensured if you know what is happening to your data. Therefore, we would like to ask you to take the time to read this privacy policy carefully. We strictly adhere to the applicable data protection regulations and we use technical as well as organizational measures to protect your data.

1. minimum age for registration

Registration with and use of the customer portal is only permitted to persons of full age. Minors are not permitted to register and use the customer portal.

2. your data collected by us as well as the type, purpose and legal basis of processing and use

2.1 Data to be provided by you during registration

When registering, you must first register by providing your name and e-mail address.

When you register, you assign a password that you can change at any time in the account management. Your password and your e-mail address cannot be seen by other people and we will not pass them on to third parties. We use your e-mail address to get in contact with you.

You can manage and change your personal data, which are necessary for processing your investments, in the "Settings" section. When you register, we will assign you a customer number that will be linked to all transactions and activities.

This recorded data is required so that you can be managed as a customer at Aescuvest and use the portal. The collection and processing of this data is therefore based on a pre- and contractual basis Art. 6 para. 1 lit. b) DSGVO. Furthermore, by registering you have given us your consent (Art. 6 para. 1 lit. b) DSGVO) to process the data. This data will be stored for the period of time during which you are an Aescuvest customer.

2.2 Functions of the user portal

After registration, the data (contact and address details, date of birth, nationality, bank details, securities account number) must be completed by you in the "Settings" section so that you can make investments. We need this data to be able to process the statements and payments for your investments, as well as to prepare the tax-relevant documents.

You can manage some of this data yourself. The data (bank details and name), which are required for processing and billing from a financial point of view, can only be changed with the support of the user support.

The legal basis for the collection, storage and processing of your personal data from the employment relationship is based on your customer relationship with us in accordance with Art. 6 Para. 1 lit. b) DSGVO.

2.3 Logfiles (log file)

Every time you log on to the user portal, your browser automatically sends certain information to the server of the Internet site, which then saves it in a so-called log file. This is for example information about

- the type and version of the browser you use,
- the operating system you use,
- the website from which you came to the current page,
- the host name (IP address) of your computer and
- the time at which the call was made.

Subject to any legal retention obligations, we delete or anonymise your IP address after you leave the portal.

In addition, we use the information transmitted to our servers by your browser in anonymised form - i.e. without the possibility of drawing conclusions about you - to analyse and improve our services. In this way we can, for example, discover or determine possible errors. Anonymised data is no longer personal data.

The legal basis for the collection and processing of information stored in a log file is our contractual relationship Art. 6 para. 1 lit. b) DSGVO and your consent Art. 6 para. 1 lit. a) DSGVO.

2.4 Cookies

Cookies are very small text files used by Internet sites that your browser stores on your computer. So-called "session cookies" are temporarily stored in the working memory and are automatically deleted when you close the browser. So-called "permanent cookies" are stored on the hard disk for a defined longer period of time; they are automatically deleted after the defined period of time has elapsed.

Cookies serve primarily to make the use of a website easier, more effective and safer. We use cookies in order to be able to identify you consistently after logging in and during your session. After the end of your session, the corresponding session cookie automatically expires. The cookies we use are necessary for the error-free provision of the user portal.

You can set your browser so that it generally does not accept cookies, or only accepts them after you have expressly confirmed them. You can easily find out how this works by using the help function of your browser. If your browser does not accept cookies, however, the range of functions available to user portals may be limited or not available at all.

3. transmission or transfer of your data to third parties

As a matter of principle, we do not transfer your data to third parties without your consent.

However, a technical transfer can be made if and to the extent that this is necessary for the operation of the user portal or for other reasons for the establishment, implementation or processing of your contractual relationship with us. This can be the case if the website is hosted by an external service provider, i.e. an external service provider operates the servers for Aescuvest. Furthermore, we forward your data to service providers for the execution of electronic payment and for the administration of investment projects. The processing is based on art. 6 paragraph 1 letter b) DSGVO for the transfer.

As a company, we are also subject to various legal obligations, i.e. legal requirements as well as commercial and tax law regulations and, in particular, financial regulations. The purposes of processing include identity and age verification, fraud and money laundering prevention and the fulfilment of tax obligations. This also includes the transfer of data to the companies in which you have invested and which we have commissioned to check your identity - if necessary.

This processing is carried out on the basis of legal requirements (Art. 6 para. 1 lit. c) DSGVO) or in the public interest (Art. 6 para. 1 lit. e) DSGVO)

4. protection of your data

To protect your data, for example, against manipulation, loss and unauthorized access by third parties, we use technical and organizational measures to ensure an appropriate level of protection of your personal data. These measures include the use of firewalls and antivirus programs as well as manual security measures. We continuously review and improve our security measures according to the current state of the art. In addition, we make your data anonymous as far as this is technically possible.

5. current version and amendment of these data protection provisions

This is version 1.0 of 22.05.2020 of the data protection regulations for the Aescuvest user portal.

We are constantly developing our online presence in order to provide you with ever improving functions. We will always keep these data protection regulations up to date and adapt them accordingly if and when necessary.

We will of course inform you of any changes to these data protection provisions. We will do this both by sending an e-mail to the e-mail address you have provided us with and by an automatic notification when you log in for the first time after a successful update of this data protection policy. Should further consent from you to our handling of your data be required, we will of course obtain this from you before any changes take effect.

You can retrieve the current version of the data protection regulations in your "Settings" of the portal.

6. your rights

You can first request information from us as to whether personal data concerning you is being processed. If this is the case, you have the right to receive information about this personal data and further information. Such information shall include the purposes of the processing, the categories of personal data, the recipients or categories of recipients, if possible, the planned duration of the processing or, failing that, at least the criteria for determining that duration. In addition, you have the right to know that you have the right to rectification, deletion of personal data concerning you, restriction of processing, opposition to processing and the right to appeal to a supervisory authority.

If we do not collect personal information directly from you, you have the right to all available information about the origin of the data.

We will gladly provide you with a copy of your personal data that we process free of charge. Should you request further copies, a reasonable fee will be charged for each additional copy in the amount of the administrative costs.

You may revoke, in whole or in part, any consent to the collection, processing and use of your personal data that you have given us by agreeing to these data protection provisions with effect for the future. The same applies to any later, more extensive consents to the collection, processing or use of your personal data. The consequence of such a revocation may be that you can no longer or only to a limited extent use the user portal.

You can also request at any time the correction of incorrect data, which includes the completion of incomplete data, taking into account the purposes of processing. In addition, you can also exercise your right of cancellation or request the restriction of processing.

Furthermore, you have a right to data transferability. This means that upon request, you will receive the personal data you have provided us with in a structured, common and machine-readable format. You have the right to transfer this data to another responsible person without hindrance from us.

Opposition to processing

You have the right to object at any time, for reasons arising from your specific situation, to the processing of personal data concerning you, which is carried out on the basis of Art. 6, paragraph 1, letter e or f FADP.

We will no longer process the personal data concerning you unless we can prove compelling reasons for processing that are worthy of protection, which outweigh your interests, rights and freedoms, or unless the processing serves to assert, exercise or defend legal claims.

Right to revoke the declaration of consent under data protection law

You have the right to revoke your data protection declaration of consent at any time. Revocation of your consent does not affect the legality of the processing that has taken place on the basis of your consent until revocation.

They have the right to object to the data processing and a right of appeal to a supervisory authority.

Please feel free to contact us, for example by e-mail at data-privacy@aescuvest.eu or by post at Aescuvest international GmbH, Hanauer Landstr. 328-330, D-60314 Frankfurt am Main. If necessary, we may require proof of your identity before we can implement your request. This serves to protect your data from manipulation or deletion by third parties.

However, if and to the extent that statutory rights or obligations to retain data exist, we will block the corresponding data for further use.

7. responsible body, data protection officer and contact

The person responsible here in the sense of data protection law is **Aescuvest international GmbH, Hanauer Landstr. 328-330, D-60314 Frankfurt am Main.**

If you have any questions about these data protection provisions or about the collection, processing or use of your data by us, please contact our data protection officer Stephan Krischke by e-mail at data-privacy@aescuvest.eu.

8. joint responsibility for data processing

Aescuvest GmbH and **Aescuvest international GmbH** have signed an agreement on joint responsibility in accordance with Art. 26 DSGVO for the purpose of

- Division of the organizational and technical business processes or activities,
- Distribution of human resources, closed.

The agreement essentially comprises

- The use of common IT systems,
- the establishment of common technical and organisational measures for data security,
- the appointment of a data protection officer,
- keeping the register of processing activities,
- the obligation of those responsible to block the data if consent is revoked,
- the common commitment regarding the rights and information obligations of data subjects,
- the use of subcontractors and service providers,
- the definition of processes for data protection incidents.