

The following information provides an overview of the way we process your personal data and your rights under data protection law. Which data are processed in detail and how they are used depends largely on the services requested or agreed in each case. Please also pass on the information to the current and future authorised representatives and beneficial owners. These include, for example, beneficiaries in the event of death or authorised signatories.

1. Responsibility for data processing

Responsible body:

DJE Kapital AG

Pullacher Straße 24

D-82049 Pullach

Tel.: +49 89 790453-0

Fax: +49 89 790453-185

E-mail: info@dje.de

You can contact our company data protection officer at:

Alexander Bugl

Betrieblicher Datenschutzbeauftragter (FH)

Bugl & Kollegen GmbH

Sedanstraße 7

D-93055 Regensburg

Tel.: +49 941-630 49 789

Mobile: +49 176-10 31 26 88

E-mail: kontakt@buglkollegen.de

Web: www.buglkollegen.com

2. Processing of personal data from the following sources and data

We process personal data that we receive from our customers in the course of our business relationship. This is the case if you contact us, e.g. as an interested party, applicant or customer and in particular if you are interested in our products and fill out online contract sections, register for online services or contact us by e-mail, telephone or application and use our products and services as part of an active business relationship. In all these cases we collect, store, use, transmit or delete personal data.

In addition – to the extent necessary for the provision of our services – we process personal data that we have received from other companies (namely DJE Investment S.A, DJE Finanz AG Switzerland) or from other third parties/other service providers (e.g. for the execution of orders, for the fulfilment of contracts or on the basis of a consent given by you). We also process personal data that we have legitimately obtained and are allowed to use from publicly accessible sources (e.g. land registers, trade and association registers, Federal Gazette, press, media, Internet).

Where necessary, we also collect personal data from persons who are not directly connected to us and who belong, for example, to one of the following groups of persons:

- family members
- co-applicants
- legal representatives (authorised representatives)
- beneficiaries of our customers

- economic beneficiaries of our customers
- stockholders
- representative of legal entities
- employees of service providers or trade partners

a. Personal data may be collected, processed and stored when products/services are purchased and used.

We process the following personal data:

- identity information (e.g. first and last name, ID or passport number, nationality, place and date of birth, gender, photograph, IP address)
- contact information (address, e-mail address and telephone number)
- tax information (tax identification number, tax status)
- bank, financial and transaction data (e.g. bank details (IBAN), money transfers from and to your account/deposit, assets, investor profile, financial expenses)
- data on habits and preferences (IP addresses, data on the use of our products and services in relation to banking, financial and transaction data, data on interaction between you and us (visiting our websites, using our apps and social media sites, personal meetings, telephone calls, chat histories, e-mail traffic, surveys))
- in relation to the securities business: information on knowledge and/or experience with securities (MiFID status), investment behaviour/strategy (period, scope, frequency of the client's transactions with financial instruments, clients' risk appetite), information on education and occupation (e.g. level of education, occupation, name of employer), earnings, financial circumstances (assets, liabilities, income, e.g. from employment/self-employment/business; expenses), foreseeable changes in financial circumstances (e.g. retirement age), concrete goals/major concerns in the future (e.g. planned acquisitions, redemption of liabilities), marital status and family situation, tax information (e.g. information on church tax), documentation data (e.g. declarations of suitability)
- in relation to interest rate, currency and liquidity management: information on knowledge and/or experience with interest/currency products/financial investment (MiFID status), investment behaviour/strategy (period, scope, frequency of the client's transactions with financial instruments, clients' risk appetite), profession, financial circumstances (assets, liabilities, income, e.g. from employment/self-employment/business; expenses), foreseeable changes in financial circumstances (e.g. retirement age), concrete goals/major concerns in the future (e.g. planned acquisitions, redemption of liabilities), tax information (e.g. information on church tax), documentation data (e.g. consulting protocols)
- customer contact information initiated by you or DJE Kapital AG during the starting period of the business relationship or as part of the ongoing business relationship, in particular through personal, telephone or written contacts, as well as personal data arising, e.g. information on contact channels, date, occasion and results, (electronic) copies of correspondence as well as information on participation in direct marketing measures and details of interests and wishes of you which you have expressed to us.

- digital services: with regard to the data processed when using digital service products, reference is made to further information on data protection in connection with the respective digital service
- audio-visual data (information from the video identification procedure, recordings of calls)

If requested by the customer, we also collect personal data from children. In doing so, we ensure that the holders of parental responsibility consent to the processing of personal data or, in certain cases, to the consent of the child.

In principle we do not process personal data concerning racial or ethnic origin, political beliefs, religious or ideological views, membership of a trade union, as well as genetic data, biometric data for the unambiguous identification of a natural person, health data or data concerning sexual life or sexual orientation (unless required e.g. for the payment of church tax or by order of the supervisory authorities, e.g. for copies of identity cards as part of the legitimization check).

b. When visiting the websites www.dje.de and www.solidvest.de:

When you visit our websites, the browser on your device automatically sends information to our websites' server. This information is temporarily stored in a so-called log file. The following information is recorded and stored until it is automatically deleted:

- IP address of the requesting computer (or terminal device)
- date and time of access
- name and URL of the retrieved file
- website from which access is made
- the browser used and, if applicable, the operating system of your computer (or your terminal device) and the name of your access provider

c. Cookies

We use so-called cookies when you visit the websites www.dje.de and www.solidvest.de. Cookies are small texts that can be stored on your computer or mobile device by providers of websites. The purpose of a cookie is to simplify your visit to our website: A cookie enables us to provide our services to you on an individual base. The purpose of the cookies used is not to collect personal data from you. Cookies do not cause any damage to your end devices, contain no viruses, Trojans or other malware. Before storage, each data record is made anonymous by changing the IP address. We use so-called "session cookies" to recognize that you have already visited individual pages of our websites. These expire after leaving our site after a certain period of time. We also use temporary cookies that are stored on your computer or terminal device for a specified period of time to optimize user-friendliness. In the event that you visit our websites again to use our services, it is automatically recognized that you have already been with us and what entries and settings you have made. This way you do not have to enter them again. We also need cookies for analysis tools such as "Google Analytics" (see below).

If you do not wish cookies to be used on your computer, you must delete our cookies from your hard drive yourself. You can set your browser so that you are informed about cookie settings and can decide individually whether to accept them. The functionality of our websites may be

restricted if cookies are not accepted.

The websites www.dje.de and www.solidvest.de use Google Analytics, a web analysis service of Google Inc. (<https://www.google.de/intl/de/about/>) (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA („Google“). Google Analytics creates pseudonymous user profiles and uses "Cookies", which are text files placed on your computer, to help the website analyse how users use the site. The information generated by the cookie about your use of the above websites

- browser type
- operating system used
- referrer URL (previously visited page)
- host name of the accessing computer or terminal (IP address)
- time of the server request

are usually transferred to a Google server in the USA and stored there. However, if IP anonymisation is activated on this website, Google will reduce your IP address within Member States of the European Union or in other countries party to the Agreement on the European Economic Area beforehand. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. On behalf of the operator of these websites, Google will use this information to evaluate your use of the website, to compile reports on the website activities and to provide the website operator with further services associated with the use of the website and the Internet. The IP address transmitted by your browser in the context of Google Analytics is not merged with other Google data. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this you may not be able to use the full functionality of this website. You can also prevent Google from collecting the data generated by cookies and relating to your use of the website (including your IP address) and from processing this data by Google by downloading and installing the browser plug-in available under the following link (<http://tools.google.com/dlpage/gaoptout?hl=de>)

d. Supplier data

We collect personal data from our suppliers in the course of working with them to ensure a smooth business relationship. We collect the data of our contact persons within the organisation, e.g. name, telephone number and e-mail address. We also collect bank data in order to make payments to our suppliers.

3. What do we process your data for (purpose of processing) and on what legal basis?

We process the aforementioned personal data in accordance with the provisions of the EU Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG):

- a. For the fulfilment of contractual obligations (Article 6 para. 1 lit. b GDPR) The processing of personal data takes place for the provision of financial services within the framework of the execution of our contracts with our customers or for the execution of pre-contractual measures which take place on your request. The purposes of data processing are primarily based on the specific product (see point 2) and may include, among other things, requirements analyses, advice, asset management and support as

well as the execution of transactions. Further details for the purpose of data processing can be found in the respective contractual documents and terms and conditions.

We process the personal data of persons within our suppliers' organisation in order to be able to make use of their services. We also store the financial data so that we can pay for our suppliers' services.

b. Within the framework of the balancing of interests (Article 6 para. 1 lit. f GDPR)

If necessary, we process your data beyond the actual performance of the contract to protect the legitimate interests of us or third parties. Examples:

- review and optimization of procedures for requirements analysis and direct customer approach, incl. customer segmentation and calculation of contract probabilities
- advertising or market and opinion research, as long as you have not objected to the use of your data
- assertion of legal claims and defence in legal disputes
- ensuring the IT security and IT operation of DJE Kapital AG
- the prevention of criminal offences, in particular fraud prevention
- video surveillance for the protection of the domiciliary rights, for the collection of evidence in robberies and fraud offences
- measures for building and system security (e.g. access controls)
- measures to secure the domiciliary right
- measures for business management and further development of services and products

In relation to the offered websites:

- Ensuring a smooth connection setup of the websites www.dje.de and www.solidvest.de
- ensuring comfortable use of our websites
- evaluation of system security and stability as well as
- for other administrative purposes

In relation to cookies: By using cookies, we want to optimize the use of our websites www.dje.de and www.solidvest.de in terms of user-friendliness, as well as collect statistics and evaluate them for the purpose of optimizing our services for you.

In relation to Google Analytics: With the tracking measures used, we want to ensure that our websites are designed and continuously optimised to meet requirements and to learn about the statistical evaluation of the use of our websites.

In relation to Google DoubleClick-Remarketing: We use Google's remarketing technology. This technology allows users who have already visited our website and online services and are interested in our offers to be addressed again through targeted advertising on the pages of the Google Partner Network. The insertion of the advertisement takes place via the use of cookies. With the help of the text files, the user behaviour when visiting the websites can be analysed and subsequently used for targeted product recommendations and interest-based advertising. No storage of personal data of the visitors of the websites takes place. You can permanently deactivate the use of cookies by Google by following the following link and downloading and installing the plug-in provided there: <https://www.google.com/settings/ads/plugin>. DoubleClick cookies may also be deactivated by visiting the NAI (Network Advertising Initiative)

deactivation page at <http://www.networkadvertising.org/choices/>). For more information about Google Remarketing and Google's privacy policy, please visit <http://www.google.com/privacy/ads/>.

In relation to Google Conversion-Tracking:

- We use the so-called Conversion Tracking when using the Google AdWords service. When you click on an ad served by Google, a conversion tracking cookie is placed on your computer/end device. These cookies lose their validity after 30 days, do not contain any personal data and are therefore not used for personal identification. The information collected using the conversion cookie is used to generate conversion statistics for AdWords customers who have opted for conversion tracking. Users' data is processed pseudonymously within the framework of Google marketing services. This means, for example, that Google does not store and process the names or e-mail addresses of users but processes the relevant data cookie-related within pseudonymous user profiles. This means from Google's point of view, that the ads are not managed and displayed for a specifically identified person, but for the cookie holder, regardless of who this cookie holder is. This does not apply if a user has expressly permitted Google to process the data without this pseudonymisation. The information collected by Google marketing services about users is transmitted to Google and stored on Google's servers in the USA.
- One of the Google marketing services we use is the online advertising program "Google AdWords". In particular, we use the remarketing function within the Google AdWords service. In the case of Google AdWords, each AdWords customer receives a different "conversion cookie". Cookies cannot therefore be traced through the websites of AdWords customers. The information collected by the cookie is used to generate conversion statistics for AdWords customers who have opted for conversion tracking. AdWords customers see the total number of users who clicked on their ad and were redirected to a page with a conversion tracking tag. However, they will not receive any information that personally identifies users.
- We can integrate third-party advertisements based on the Google marketing service "DoubleClick". DoubleClick uses cookies to enable Google and its partner sites to serve ads based on users' visits to this site or other sites on the Internet.
- We may also use "Google Tag Manager" to integrate and manage Google analytics and marketing services on our websites. Google Tag Manager is a solution that allows marketers to manage website tags through a single interface. The Tool Tag Manager itself (which implements the tags) is a cookie-free domain and triggers other tags that may collect data. Google Tag Manager does not access this data. If deactivation has been made at the domain or cookie level, it will remain in effect for all tracking tags implemented with Google Tag Manager. We may ask for your permission to share some product information with other Google products to enable certain features, such as adding new conversion tracking tags for AdWords. We may ask for your permission to share some product information with other Google products to enable certain features, such as adding new conversion tracking tags for AdWords. For more information, see the usage guidelines for this product at Produkt unter <http://www.google.com/intl/de/tagmanager/use-policy.html>.

- For more information on how Google uses your information for marketing purposes, please visit the overview page: <https://www.google.com/policies/technologies/ads>. Google's privacy policy is available at <https://www.google.com/policies/privacy>. If you wish to object to interest-based advertising by Google marketing services, you can use the setting and opt-out options provided by Google: <https://adssettings.google.de>.
- For more information about Google and Google's privacy policy, please visit <http://www.google.com/privacy/ads/>. You can also disable interest-based ads on Google and interest-based Google ads on the web (within the Google display network) in your browser by clicking the "Off" button at <https://adssettings.google.de> or by opting out at <http://www.aboutads.info/choices>. For more information about your choices and privacy at Google, please visit <https://www.google.de/intl/de/policies/privacy?fg=1>.

In relation to Hotjar:

- We use Hotjar, a web analysis service of Hotjar Ltd, Level 2, St Julian's Business Centre, 3, Elia Zammit Street, St Julian's STJ 1000, Malta ("Hotjar") to better understand our users' needs and optimize our services and user experience.
- Website visitors are assigned a unique user ID (UUID) so that Hotjar can identify returning visitors without relying on personal information such as their IP address. Hotjar stores this data in a pseudonymized user profile. When data is recorded, Hotjar automatically suppresses keystroke data in password fields and credit card numbers in input fields so that they never reach our servers. Neither Hotjar nor we will use this information to identify individual users, nor will the data be merged with other data about individual users.
- You can object to the creation of user profiles, the storage of data about your use of our site by Hotjar and the use of tracking cookies by Hotjar on other sites at any time under the following link <https://www.hotjar.com/opt-out>.
- For more information see: <https://www.hotjar.com/privacy>.

In relation to Facebook Pixel:

- We use the "Facebook Pixel" of the social network "Facebook", 1601 South California Avenue, Palo Alto, CA 94304, USA. In this context so-called tracking pixels are integrated on our pages. When you visit our pages, the pixel-code establishes a direct connection between your browser and the Facebook server. Among other things Facebook receives information from your browser, that our page has been called up by your terminal device. If you are a Facebook user, Facebook can associate your visit to our pages with your user account. We would like to point out that, as the provider of the pages, we have no knowledge of the data content transmitted or of its use by Facebook. We can only choose which segments of Facebook users (such as age, interests) our advertising should be displayed. By calling up the pixel from your browser, Facebook can also recognize whether a Facebook advertisement was successful, e.g. whether it led to an online contract. This enables us to measure the effectiveness of Facebook ads for statistical and market research purposes.
- Please click here if you do not wish to have data collected via Facebook pixels: https://www.facebook.com/settings?tab=ads#_=_.

Alternatively, you can disable the Facebook pixel on the Digital Advertising Alliance page by clicking on the following link: <http://www.aboutads.info/choices/>.

- The transmission of data to the USA is permitted under Art. 45 GDPR, as Facebook Privacy Shield is certified and therefore an adequate level of data protection exists according to the implementing decision of the Commission (EU) 2016/1250 (<https://eur-lex.europa.eu/legal-content/DE/ALL/?uri=CELEX%3A32016D1250>) The certification can be viewed at <https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>.

In relation to „YouTube“, „Xing.com“, „LinkedIn“, „Twitter“ and „Facebook“:

- Our websites contain links to YouTube, Xing, LinkedIn, Twitter and Facebook ("Social Networks"). We do not use social plug-ins from these social networks when you visit our websites. Only when you click on the symbol or the link of a social network do you reach its website. Data is then collected, processed and used there. We have no control over what data these social networks collect, how they process and use it. The purpose and scope of the data collection as well as the further processing and use of this data can be found in the data protection information of the respective social network on the following websites:

- Youtube: <https://www.google.com/intl/de/policies/privacy/>
- Xing: <https://www.xing.com/privacy>
- LinkedIn: <https://www.linkedin.com/legal/privacy-policy>
- Twitter: <https://twitter.com/de/privacy>
- Facebook: <https://de-de.facebook.com/policy.php>

Under no circumstances do we use the data from the cookies or the analysis tools to draw conclusions about your person.

c. On the basis of your consent (Article 6 para. 1 lit. a GDPR)

If you have given us your consent to process personal data for specific purposes (e.g. passing on data within the network/group or to use your data for specific advertising purposes), the legality of this processing is given on the basis of your consent. The data processed for the purpose of contacting us takes place on the basis of your voluntary consent, for example if you use the contact form on our websites www.dje.de and www.solidvest.de or hand us a business card. A given consent can be revoked at any time. This also applies to the revocation of declarations of consent that were given to us prior to the validity of the EU data protection regulation, i.e. before 25th May 2018. Please note that the revocation will only take effect in the future. Processing that took place before the revocation is not affected by this. If we wish to use your personal data for purposes other than those mentioned above, we will inform you accordingly and, if necessary, obtain your consent.

d. Due to legal requirements (Article 6 para. 1 lit. c GPPR) or in the public interest (Article 6 para. 1 e GDPR)

We, as a financial services institution, are subject to various legal requirements (e.g. German Banking Act, Money Laundering Act, Securities Trading Act, tax laws) and banking supervision regulations (e.g. European supervision, the German Federal Bank and the Federal Financial

Supervisory Authority (BaFin)). The purposes of the processing include, among other things, the obligations under the German Securities Trading Act (WpHG) to record the knowledge and experience of the respective client with securities services and financial instruments, the financial circumstances and investment objectives of the client, the identity and age verification, fraud and money laundering prevention, compliance with sanctions and embargo provisions, answering official inquiries from a competent governmental body or judicial authority, the fulfilment of fiscal control and reporting obligations and the assessment and management of risks of DJE Kapital AG.

4. Who gets your data?

Within DJE Kapital AG, those departments will have access to your data that are needed to comply with our contractual and legal obligations. Service providers and vicarious agents employed by us may also receive data for these purposes if they maintain banking secrecy and comply with our written instructions under data protection law.

We may only disclose information about you if required to do so by law, if you have given your consent or if contract processors commissioned by us guarantee compliance with the requirements of the EU Data Protection Regulation/the Federal Data Protection Act. Under these conditions, recipients of personal data may be, for example:

- Public bodies and institutions (e.g. Deutsche Bundesbank, Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin), European supervisory authority, tax authorities, Bundeszentralamt für Steuern) in case of a legal or official requirement.
- Other credit and financial services institutions, similar institutions and contract processors to which we transfer personal data in order to conduct the business relationship with you. These companies are also legally or contractually obliged to treat personal data with the necessary care. In particular, we work together with IT service providers, financial service providers and custodian banks.
- Service providers who support us in the following activities: Support/maintenance of IT applications, archiving, document processing, call centre services, compliance services, controlling, data screening for anti-money laundering purposes, data destruction, purchasing/procurement, space management, real estate reports, credit processing services, collateral management, recovery, customer management, lettershops, marketing, mailing of customer gifts, media technology, reporting, research, risk controlling, expense reporting, telephony, video identification, website management, investment services, share register, fund administration, auditing services, payment transactions.
- Independent agents, intermediaries, brokers.
- Members of certain regulated professions such as lawyers, notaries or accountants.
- Other data recipients may be those bodies for which you have given your consent to the data transfer or for which you have exempted us according to agreement or consent.

Note: Under no circumstances will personal data be sold to third parties.

5. Is data transferred to a third country or to an international organisation?

A data transfer to countries outside the EU or the EEA (so-called third countries) only takes place if this is required for the execution of your orders (e.g. payment and securities orders), legally required (e.g. tax reporting obligations), you have given us a consent or in the context of order processing. If service providers are used in a third country they shall, in addition to instructions in writing, be bound by the agreement of the EU standard contractual clauses on compliance with the data protection level in Europe. If you need a printout of these terms or information about their availability, you can contact us in writing.

6. How long will your data be stored?

We process and store your personal data as long as it is necessary for the fulfilment of our contractual and legal obligations. It should be noted that our business relationship is a continuing obligation that is planned to run for several years. If the data are no longer necessary for the fulfilment of contractual or legal obligations, they are regularly deleted, unless their temporary further processing is necessary for the following purposes:

- Fulfilment of commercial and tax retention periods: These include the Commercial Code, the Tax Code, the Banking Act, the Money Laundering Act and the Securities Trading Act. The periods for storage and documentation specified there range from two to ten years.
- Preservation of evidence under the statute of limitations. According to §§ 195 ff. of the German Civil Code (BGB), these limitation periods can be up to 30 years, whereby the regular limitation period is three years.

Applicants without a subsequent contract conclusion have a retention period of six months.

7. How is your personal data protected?

We take reasonable and appropriate measures to protect the information we store and process from misuse, loss or unauthorized access. To this end, we have taken a number of technical and organisational measures and will update these on an ongoing basis.

If you suspect that your personal information has been misused, lost or accessed by unauthorized persons, please let us know as soon as possible.

8. Data protection rights under the Data Protection Regulation

Any person concerned shall have the right of access under Article 15 GDPR, the right to correction under Article 16 GDPR, the right to erasure under Article 17 GDPR, the right to limitation of processing under Article 18 GDPR, the right of opposition under Article 21 GDPR and the right to data transfer under Article 20 GDPR. The restrictions according to §§ 34 and 35 BDSG apply to the right to information and the right of cancellation.

The right to information includes information about the purposes of processing, the category of personal data, the categories of recipients to whom your data has been or will be disclosed, the planned storage period, the existence of a right to rectification, deletion, restriction of processing, objection or data transfer, the existence of a right of appeal, the origin of your data, if not collected by us, and the existence of automated decision-

making, including profiling and, if applicable, meaningful information on their details.

You can request the immediate correction of incorrect or the completion of your personal data collected with us at any time.

You can request the deletion of your personal data stored with us for the following reasons:

- your personal data is no longer needed 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
- if your personal data have been processed unlawfully
- if your personal data must be deleted in order to comply with legal requirements

The data may not be deleted if the processing is necessary to exercise the right to freedom of expression and information, to fulfil a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims. If this is not the case, we will delete your data upon request. We will usually also assume that it is your wish that we include your name in our list of people who do not wish to be contacted. This way we minimize the chance that you will be contacted in the future if your data is collected separately under different circumstances.

Under certain circumstances, you may request that we limit the processing of your personal data. This means that we will only store your data in the future and will not be able to carry out any further processing activities until: (i) any of the conditions listed below has been eliminated, (ii) you give your consent or (iii) further processing is necessary to assert, exercise or defend legal claims, protect the rights of other persons or if it is necessary in the legitimate public interest of the EU or a Member State. You may request that we limit the processing of your personal data in the following circumstances:

- If you dispute the accuracy of the personal data we process about you. In this case, we will limit the processing of your personal data until the accuracy of the data has been verified.
- If you object to the processing of your personal data by us in the interest of our legitimate interests. In this case, you may request that the data be restricted while we review our reasons for processing your personal data.
- If the processing of your data by us is wrongful, but you prefer to restrict the processing by us instead of having the data deleted.
- If there is no longer a need for us to process your personal data, but you do need the data to assert, exercise or defend legal claims.

If we have passed on your personal data to third parties, we will inform them of the limited processing, provided this is possible and does not require disproportionate effort. We will of course inform you before lifting any restrictions on the processing of your personal data.

You may receive the personal data you have provided to us in a structured, common and machine-readable format or request that it be transferred to another person responsible.

If a decision to conclude or fulfil a contract has only been taken in an automatic process (Art. 22 GDPR) and this decision has legal effect against you or significantly affects you in a similar manner, you can request a

further manual review from us after you have given us your point of view and requested the manual review. In the event of such a decision, we will also inform you separately about the reason, the scope and the intended effects of such data processing.

In addition, there is a right of appeal to our data protection officer and to a data protection supervisory authority (Article 77 GDPR in conjunction with § 19 BDSG). As a rule, you can contact the supervisory authority at your usual place of residence or workplace or at our company headquarters.

You can revoke your consent to the processing of personal data at any time. This also applies to the revocation of declarations of consent that were given to us prior to the validity of the EU data protection regulation, i.e. before 25th May 2018. Please note that the revocation will only take effect in the future. Processing that took place before the revocation is not affected by this. This also applies if we use your data for our direct advertising. Please also note in this respect the separate notice at the end of this data protection information.

We have to stop the corresponding activities in case you object. This applies with the exception that we can prove that we have overriding legitimate reasons for the processing that outweigh your interests or that the data are processed in order to assert, exercise or defend a legal claim.

9. Is there a requirement for you to provide data?

In the context of our business relationship you must provide those personal data which are necessary for the establishment and implementation of a business relationship and the fulfilment of the associated contractual obligations or for the collection of data which we are legally responsible for. Without these data we will usually have to refuse the conclusion of the contract or the execution of the order or we will no longer be able to execute an existing contract and may have to terminate it. In particular, and in accordance with the provisions of money laundering law, we must collect and record your name, place of birth, date of birth, nationality as well as your residential address and identification data before establishing the business relationship, for example on the basis of your identity card. In order for us to comply with these legal requirements, you must provide us with the necessary information and documents in accordance with § 11 Para. 6 Money Laundering Act and notify us immediately of any changes arising in the course of the business relationship. If you do not provide us with the necessary information and documents, we may not establish or continue the business relationship you have requested.

10. To what extent is there an automated decision-making (including profiling)?

In principle and in accordance with Article 22 GDPR we do not use fully automated decision-making to establish and carry out the business relationship. Should we use these procedures in individual cases, we will inform you separately, insofar as this is required by law.

11. Is there any so-called “profiling”?

We process your data partially automatically with the aim of evaluating certain personal aspects (profiling). For example, we use profiling in the following cases:

- Due to legal requirements we are committed to the fight against money laundering and fraud. Data is also evaluated in this context (for example, in payment transactions). These measures also serve to protect you.
- We use evaluation instruments in order to be able to inform and advise you specifically about products. This enables demand-oriented communication and advertising, including market and opinion research.
- In the online asset management service “solidvest” we carry out an automated process to offer you asset management based on your stated knowledge and experience with investment services and financial instruments (period, scope, frequency of transactions with financial instruments), MiFID status, investment objectives/strategies, risk appetite, information on education and profession (e.g. level of education, occupation, earnings), as well as financial circumstances, including the ability to bear losses.

12. How can you inform yourself about changes to these important notes?

Against a background of constant technical change, these notes will be adjusted regularly if necessary. Please check regularly and in particular before each use of a service whether an updated version is available. You can access and print out the current data protection declaration at any time on the websites at https://www.dje.de/DE_de/privacy bzw. <https://www.solidvest.de/datenschutz> von Ihnen abgerufen und ausgedruckt werden.

13. Review clause

This data protection declaration is currently valid (as of 25th May 2018). DJE Kapital AG reserves the right to change this data protection declaration from time to time. We will inform you about fundamental changes on the website and through the usual communication channels.

Information on your right of objection under Article 21 of the EU Data Protection Regulation (GDPR)

1. Right of objection on a case-by-case basis

You have the right to object at any time for reasons arising from your particular situation to the processing of personal data concerning you, which is based on Article 6(1)(e) GDPR (data processing in the public interest) and Article 6(1)(f) GDPR (data processing on the basis of a balance of interests). This also applies to a profiling based on this provision within the meaning of Article 4 para. 4 GDPR. If you object, we will no longer process your personal data, unless we can prove compelling reasons worthy of protection for the processing, which outweigh your interests, rights and freedoms, or if the processing serves to assert, exercise or defend legal claims.

2. Right to object to the processing of data for advertising purposes

We process your personal data in individual cases for direct marketing purposes. You have the right to object at any time to the processing of your personal data for the purpose of such advertising. This also applies to profiling, insofar as it is connected with such direct advertising. If you object to the processing for direct advertising purposes, we will no longer process your personal data for these purposes.

The objection can be made informally and should be addressed by telephone (if possible): +49 89 790453-0 or alternatively as an email to widerspruch@dje.de.

DJE Kapital AG