

PRIVACY POLICY

As of 30 April 2026

This Privacy Policy is legally binding only in its German version. Any English translation is provided for informational purposes and ease of understanding only; in the event of any discrepancy, divergence, ambiguity, or conflict between the German and English versions, the German version shall prevail exclusively.

We inform you below about the processing of your personal data in connection with the use of our website. "Personal data" means any information relating to an identified or identifiable natural person (e.g. name, address, email address, etc.). Wherever the terms "website" or "our website" are used below, these refer to all websites operated by us on a permanent or temporary basis (e.g. for marketing campaigns) and are therefore covered by this privacy policy.

1. CONTROLLER

The controller within the meaning of Article 4(7) of the European General Data Protection Regulation (GDPR) is:

CapTrader GmbH

Elberfelder Straße 2

D-40213 Düsseldorf

Phone +49 (0)211 740 786-00 Fax +49 (0)211 740 786-90

E-Mail: info@captrader.com

You can reach our data protection officer at our contact details and by email at: datenschutz@captrader.com

2. YOUR RIGHTS

You have the following rights in relation to the personal data concerning you:

- pursuant to Article 15 of the GDPR, to request information about your personal data processed by us. In particular, you may request information about the purposes of processing, the categories of personal data, the categories of recipients to whom your personal data have been or will be disclosed, the planned storage period, the existence of a right to rectification, erasure, restriction of processing or objection, the existence of a right to lodge a complaint, the origin of your data if it was not collected from you, as well as the existence of automated decision-making including profiling and, where applicable, meaningful information about its details;
- pursuant to Article 16 of the GDPR, to request the immediate rectification of inaccurate personal data stored by us, or the completion of your personal data.
- pursuant to Article 17 of the GDPR, to request the erasure of your personal data stored by us, unless processing is necessary for exercising the right to freedom of expression and information, for compliance with a legal obligation, for reasons of public interest, or for the establishment, exercise, or defense of legal claims.

- pursuant to Article 18 of the GDPR, to request the restriction of the processing of your personal data, where you contest the accuracy of the data, the processing is unlawful but you oppose its erasure, we no longer need the data but you require it for the establishment, exercise or defense of legal claims, or you have objected to processing pursuant to Article 21 of the GDPR;
- pursuant to Article 20 of the GDPR, to receive your personal data that you have provided to us in a structured, commonly used and machine-readable format, or to request that it be transmitted to another controller;
- pursuant to Article 7(3) of the GDPR, to withdraw your consent given to us at any time. This means that we may no longer continue the data processing based on that consent in the future.

You also have the right to lodge a complaint with a data protection supervisory authority about our processing of your personal data (see Article 77 of the GDPR).

3. COLLECTION OF ACCESS DATA AND LOG FILES

When you use our website for information purposes only, that is, if you do not register or otherwise provide us with information, we collect only the personal data that your browser transmits to our server. If you wish to view our website, we collect the following data, which is technically necessary for us to display our website to you and to ensure stability and security.

The legal basis is Article 6(1)(f) of the GDPR:

- IP address
- Date and time of the request
- Time zone difference to Greenwich Mean Time (GMT)
- Content of the request (specific page)
- Access status/HTTP status code
- Amount of data transferred each time
- Referrer URL (the website previously visited)
- Browser
- Operating system and its interface
- Language and version of the browser software

The above information is stored for security reasons (e.g. to investigate misuse or fraud) for a maximum period of 10 days and then deleted. Data whose continued storage is required for evidentiary purposes is excluded from deletion until the respective incident has been finally clarified. In addition to the above data, cookies are stored in your browser's history when you use our website (see section 5 of the privacy policy).



4. SSL/TLS ENCRYPTION

Our website uses SSL or TLS encryption for reasons of IT security and to protect the transmission of confidential content, such as inquiries or account openings. You can recognize an encrypted connection by the fact that the browser's address bar changes from "http://" to "https://" and by the lock icon in your browser bar. When SSL or TLS encryption is activated, data you transmit to us cannot be read by third parties.

5. USE OF COOKIES

Our website uses so-called "cookies." These are small text files stored in your browser history. They are used to make our website overall more user-friendly and effective. You can block cookies from being set and delete cookies that have already been set. Further information can be found from the manufacturer or in the help function of your internet browser. Excluding cookies may lead to limitations in the functionality of our website. General objection to the use of cookies used for online marketing purposes can be declared for a large number of services, especially in the case of tracking, via the US website <http://www.aboutads.info/choices/> or the EU website <http://www.youronlinechoices.com/>. We use the following types of cookies, the scope and functionality of which are explained below:

Functional Cookies

Functional cookies ensure that our website functions properly. They are stored for a maximum period of 2 years and are then automatically deleted. For example, these cookies can be used to store preferences such as language, location, number of search results, etc.; save settings for optimal video display, such as the desired buffer size and the resolution data of your screen; record your browser settings so that our website is displayed optimally on your screen; detect misuse of our websites and services, for example by recording several consecutive failed login attempts; load the website evenly so that it remains accessible; or save your login data so that you do not have to enter it again each time.

Affiliate Marketing

In addition, we use cookies to measure the success of our marketing activities in the area of affiliate marketing (see section 12 of the privacy policy).

6. EXTERNAL LINKS

Our website also contains references to third-party websites. These are generally identified by the website address. We have no influence over the content or design of these websites operated by other providers and therefore cannot extend the content of this privacy policy to such third-party websites.

7. E-MAIL CONTACT

If you provide us with your email address, we will also communicate with you by email. If you no longer wish to receive such information, you may withdraw your consent at any time. In that case, please send us a short message using the contact details provided in section 1 of the privacy policy. Please note that communication by unencrypted email is insecure and the confidentiality of the information transmitted cannot be guaranteed. We recommend that you send confidential information exclusively by encrypted email or by post.



8. NEWSLETTER

With your consent, you can subscribe to our newsletter, through which we inform you about our products and services, current market topics, exclusive promotions and prize draws, and provide valuable tips on global stock trading. To subscribe to the newsletter, you must provide your email address. Providing additional, separately marked data is voluntary and is used so that we can address you personally. After your confirmation, we store your email address for the purpose of sending the newsletter. The legal basis is Article 6(1)(a) of the GDPR. We use the so-called double opt-in procedure for newsletter registration. This means that after you register, we send an email to the address provided in which we ask you to confirm that you wish to receive the newsletter. In addition, we store the IP addresses used by you and the times of registration and confirmation. The purpose of this procedure is to be able to prove your registration and, if necessary, clarify any possible misuse of your personal data.

You may withdraw your consent to receive the newsletter and unsubscribe at any time. You can do so by clicking the link provided in each newsletter email, by emailing datenschutz@captrader.com, or by sending a message to the contact details given in section 1 of the privacy policy.

9. MAILCHIMP

We use the service "MailChimp" for newsletter registration, delivery and analysis. The provider is Rocket Science Group LLC, 675 Ponce De Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA. The personal data you provide when subscribing to the newsletter, or later add yourself, is stored on MailChimp servers in the USA.

With MailChimp's services, we can analyze our newsletter campaigns. When you open an email sent via MailChimp, a file contained in the email, known as a web beacon, connects to MailChimp's servers in the USA. This allows us to record whether newsletter messages are opened, when they are opened, and which links, if any, are clicked. Technical information is also collected, such as the time of retrieval, IP address, browser type and operating system. For technical reasons, this information can be assigned to individual newsletter recipients. However, neither we nor, where applicable, the email service provider intend to monitor individual users. Rather, the analyses help us understand our readers' habits and adapt our content accordingly, or send different content based on our users' interests.

The analysis is not possible if you have disabled image display by default in your email program. In that case, the newsletter will not be displayed in full and you may not be able to use all functions. If you manually display the images, the analysis described above takes place. The data processing is based on your consent (Article 6(1)(a) GDPR). You may withdraw this consent at any time by unsubscribing from the newsletter (see section 9 of the privacy policy). The lawfulness of processing carried out before the withdrawal remains unaffected.

The data you provide for the purpose of subscribing to the newsletter will be stored until you unsubscribe and then deleted from both our servers and MailChimp's servers. Data stored with us for other purposes, such as email addresses for the customer area, is not affected.

Please refer to MailChimp's privacy terms here: <https://mailchimp.com/legal/terms>. Rocket Science Group LLC is certified under the EU-U.S. Privacy Shield. The registration can be viewed here: <https://www.privacyshield.gov/participant?id=a2zt0000000TO6hAAG&status=Active>.



Conclusion of a data processing agreement

We have also concluded a data processing agreement (so-called “Data Processing Agreement”) with Rocket Science Group LLC, under which we oblige them to protect the personal data of our newsletter recipients and not to disclose it to third parties. A sample of this agreement is available

here: <https://mailchimp.com/legal/forms/data-processing-agreement/sample-agreement>

10. CONTACT FORM / LIVE CHAT

If you send us inquiries via the contact form or live chat, your details, including the contact information you provide there, will be stored for the purpose of processing your inquiry and for follow-up questions. These data will not be passed on without your consent. The legal basis for processing the personal data entered into the contact form or live chat is Article 6(1)(a) of the GDPR. The data you enter in the contact form or live chat will remain with us until you request deletion, withdraw your consent to storage, or the purpose for data storage no longer applies, for example after your inquiry has been fully processed. Mandatory legal provisions, such as retention periods, remain unaffected.

11. SOCIAL ICONS

Our website includes so-called social icons, for example from Facebook, YouTube, Google, LinkedIn and Instagram. These are integrated on our website solely as links to the respective services. Only after you click the embedded graphic will you be redirected to the page of the respective provider, meaning that personal data is only then transmitted to the respective provider.

Please refer to the respective providers' privacy policies for information on how they handle your personal data when you use these websites.

12. AFFILIATE MARKETING

We use affiliate tracking cookies on our website to record sales/leads. These affiliate tracking cookies do not store any personal data. They only collect information for identifying the referring partner, as well as a reference number for the advertising material clicked by the website visitor. This information is needed for payment settlement between us and the referring partner. The partner identification is used, in the event of a transaction, to assign and determine the commission payable to the referring partner. The legal basis is Article 6(1)(f) of the GDPR.



Conclusion of a data processing agreement

We have concluded a data processing agreement with each referring partner, under which we oblige them to protect the personal data of users of our website and not to disclose it to third parties.

13. EMBEDDING YOUTUBE VIDEOS

We have embedded YouTube videos on our website that are stored at <http://www.youtube.com> and can be played directly from our website. The provider is YouTube LLC, 901 Cherry Ave, San Bruno, CA 94066, USA. These videos are all embedded in “enhanced privacy mode,” meaning that no data about you as a user is transmitted to YouTube unless you play the videos. Only when you play the videos will the data mentioned in paragraph 2 be transmitted. We have no influence over this data transmission.

By visiting the website, YouTube receives information that you have accessed the relevant subpage of our website. In addition, the data specified in section 3 of the privacy policy is transmitted. This occurs regardless of whether YouTube provides a user account through which you are logged in or whether no user account exists. If you are logged in to Google, your data is assigned directly to your account. If you do not want your data to be associated with your YouTube profile, you must log out before activating the button. YouTube stores your data as usage profiles and uses it for advertising, market research and/or the needs-based design of its website. Such evaluation is carried out in particular, even for users who are not logged in, to provide needs-based advertising and to inform other users of the social network about your activities on our website. You have a right to object to the creation of these user profiles, but you must exercise this right directly with YouTube.

Further information on the purpose and scope of data collection and processing by YouTube can be found in the privacy policy. There you will also find further information about your rights and settings options to protect your privacy: <https://www.google.de/intl/de/policies/privacy>

14. EMBEDDING GOOGLE MAPS

We use Google Maps on this website. This allows us to display interactive maps directly on the website and gives you convenient access to the map function. The provider is Google LLC, 600 Amphitheatre Parkway, Mountain View, CA 94043, USA. By visiting the website, Google receives the information that you have accessed the relevant subpage of our website. In addition, the data specified in section 3 of the privacy policy is transmitted. This occurs regardless of whether Google provides a user account through which you are logged in or whether no user account exists. If you are logged in to Google, your data is assigned directly to your account. If you do not want your data to be associated with your Google profile, you must log out before activating the button. Google stores your data as usage profiles and uses them for advertising, market research and/or the needs-based design of its website. Such evaluation is carried out in particular, even for users who are not logged in, to provide needs-based advertising and to inform other users of the social network about your activities on our website. You have a right to object to the creation of these user profiles, but you must exercise this right directly with Google. Google is certified under the EU-U.S. Privacy Shield. The registration can be viewed here: <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>.



15. GOOGLE RECAPTCHA

We use the bot-detection function “reCAPTCHA” provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, to detect bots, for example in online form entries. Further information on the purpose and scope of data collection and processing by Google can be found in the privacy policy. There you will also find further information about your rights and settings options for protecting your privacy: <https://www.google.com/policies/privacy/>, Opt-Out: <https://adssettings.google.com/> authenticated. The legal basis for use is our legitimate interest, i.e. verifying human actions, within the meaning of Article 6(1)(f) of the GDPR. Google is certified under the EU-U.S. Privacy Shield. The registration can be viewed here: <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>

Conclusion of a data processing agreement

We have concluded a data processing agreement (so-called “Data Processing Agreement”) with Google, under which we oblige Google to protect the personal data of users of our website and not to disclose it to third parties

16. USE OF GOOGLE VERTEX AI FOR SUPPORT SERVICES

Purpose of processing: We use Google Vertex AI to provide intelligent functions, for example to create draft responses to customer email inquiries. This serves to increase efficiency and improve our service offering.

The legal basis is Article 6(1)(f) GDPR: our legitimate interest in optimizing our processes through AI-supported systems.

Recipients of the data: The recipient is Google Cloud EMEA Limited, 70 Sir John Rogerson’s Quay, Dublin 2, D02 R296, Ireland. The data is processed on the basis of a data processing agreement (Cloud Data Processing Addendum).

Third-country transfer: Data processing takes place primarily in the EU, but access by Google LLC in the USA cannot be completely ruled out. Safeguards are provided through the EU-U.S. Data Privacy Framework and, additionally, Standard Contractual Clauses

Training: According to Google, your data is not used to train global Google models. The data remains within the controlled Google Cloud instance.

Retention period: Personal data is stored only for as long as is necessary for the specific, very short processing purpose or as long as statutory retention periods require.

17. USE OF THE HOTJAR SERVICE

We use Hotjar to better understand the needs of our users and to optimize this service and their experience. Hotjar is a technology service that helps us better understand user behavior, for example how much time users spend on which pages, which links they choose, what users like and dislike, and similar information. This allows us to build and maintain our service based on user feedback.

Hotjar uses cookies and other technologies to collect data about our users' behavior and their devices. This includes the IP address of a device, processed during your session and stored in de-identified form, the screen size of the device, device type, browser information, geographic location, and the preferred language used to display our website. Hotjar stores this information in a pseudonymized user profile on our behalf. Hotjar is contractually obliged not to sell any of the data collected on our behalf.

18. CHANGE TO THE PRIVACY POLICY

As the internet continues to evolve, it is necessary to continuously adapt this privacy policy to changing circumstances. Such changes will be announced on this website in good time.