

DATA PROTECTION POLICY

English translation, German original text prevails.

About the processing of your personal data in the context of the use of our website we inform you below. "Personal data" is any information relating to an identified or identifiable natural person (e.g. name, address, e-mail address, etc.).

1. RESPONSIBLE PERSON

The responsible party within the meaning of Art. 4 No. 7 of the European General Data Protection Regulation (GDPR) is:

CapTrader GmbH
Elberfelder Straße 2
D-40213 Düsseldorf, Germany
Telephone: +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 e-mail at: datenschutz@captrader.com

2. YOUR RIGHTS

You have the following rights with regard to the personal data concerning you:

■ in accordance with Art. 15 DSGVO to request information about your personal data processed by us. In particular, you can request information about the processing purposes, the category 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 opposition, the existence of a right of complaint, the origin of your data, if it was not collected by us, as well as the existence of automated decision-making, including profiling and, if necessary, meaningful information about its details; in accordance with Art. 16 DSGVO to demand the correction of inaccurate or incomplete personal data stored by us without undue delay;

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■ pursuant to Art. 17 DSGVO, to request the erasure of your personal data stored by us, unless the processing is necessary for the exercise of 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;

■ in accordance with Art. 18 DSGVO, to request the restriction of the processing of your personal data, insofar as the accuracy of the data is disputed by you, the processing is unlawful, but you object to its erasure and we no longer need the data, but you need it for the assertion, exercise or defense of legal claims or you have objected to the processing in accordance with Art. 21 DSGVO;

■ pursuant to Art. 20 DSGVO, to receive your personal data that you have provided to us in a structured, common and machine-readable format or to request that it be transferred to another controller;

■ in accordance with Art. 7 (3) DSGVO, to revoke your consent given to us at any time. This has the consequence that we may no longer continue the data processing based on this consent for the future.

You also have the right to complain to a data protection supervisory authority about the processing of your personal data by us (cf. Art. 77 DSGVO).

3. COLLECTION OF ACCESS DATA AND LOG FILES

When you use our website for information purposes only, i.e. if you do not register or otherwise transmit information to us, we only collect 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 its stability and security. The legal basis is Art. 6 para. 1 p. 1 lit. f DSGVO:

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- 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 in each case
- Referrer URL (the previously visited website)
- Browser
- Operating system and its interface
- Language and version of the browser software.

The aforementioned information is stored for security reasons (e.g. for the clarification of abuse or fraud) for a maximum period of 10 days and then deleted. Data whose further storage is necessary for evidentiary purposes is excluded from deletion until the final clarification of the respective incident. In addition to the aforementioned data, cookies are stored in your browser history when you use our website (see section 5 of the privacy policy).

4. SSL OR TLS ENCRYPTION

Our website uses SSL or TLS encryption for reasons of IT security and to protect the transmission of confidential content (e.g. inquiries or account openings). You can recognize an encrypted connection by the fact that the address line of the browser changes from "http://" to "https://" and by the lock symbol in your browser line. If SSL or TLS encryption is activated, data that 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 that are stored in your browser history. They are used to make our website more user-friendly and effective overall.

You have the option of blocking the setting of cookies and deleting cookies that have already been set. You can obtain more information on this from the manufacturer or in the help function of your Internet browser. The exclusion of cookies can lead to functional restrictions of our website.

A 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 U.S. site <http://www.aboutads.info/choices/> or the EU site <http://www.youronlinechoices.com/>.

We use the following types of cookies, the scope and functionality of which are explained below:

Functional cookies

The functional cookies ensure that our Internet site functions properly. A storage of these **cookies** the data is stored for a maximum of 2 years, after which it is automatically deleted.

For example, the following functions are possible with these cookies:

- as save presets such as language, location, number of search results, etc.,
- saving settings for optimal video display, e.g. the desired buffer size and the resolution data of your screen,
- the collection of your browser settings in order to display our Internet site optimally on your screen,
- the detection of misuse of our websites and services, e.g. through the registration of several successive as well as failed login attempts,
- the steady loading of the web page, so that the web page remains accessible or
- saving your login data so that you don't have to enter it every time.

Affiliate Marketing

In addition, we use cookies to measure the success of our affiliate marketing activities (see section 13 of the Privacy Policy).

6. EXTERNAL LINKS

Within our website there are also links to websites of third parties. These are usually identified by the Internet address. We have no content and design of these websites of other providers and therefore cannot extend the content of this data protection declaration to such third-party websites.

7. E-MAIL CONTACT

If you provide us with your e-mail address, we will communicate with you by e-mail. If you no longer wish to receive such information, you can revoke your consent at any time. In this case, please send us a short message to the contact details given in section 1 of the data protection declaration. We would like to point out that communication by unencrypted e-mail is insecure and the confidentiality of the information transmitted cannot be guaranteed. We recommend that you send us confidential information exclusively by encrypted e-mail or by post.

8. NEWSLETTER

With your consent, you can subscribe to our newsletter, which will inform you about our products and services, current market topics, exclusive promotions and competitions, and provide you with valuable tips on Forex and CFD trading.

To register for the newsletter, you must provide your e-mail address. The provision of further, separately marked data is voluntary and will be used to address you personally. After your confirmation, we store your e-mail address for the purpose of sending you the newsletter. The legal basis is Art. 6 para. 1 p. 1 lit. a DSGVO.

For the registration to our newsletter we use the so-called double opt-in procedure. This means that after your registration, we will send you an e-mail to the specified e-mail address, in which we ask you to confirm that you wish to receive the newsletter. In addition, we store your IP addresses and the times of registration and confirmation. The purpose of this procedure is to verify your registration and, if necessary, to be able to clarify a possible misuse of your personal data.

You can revoke your consent to receive the newsletter at any time and unsubscribe. You can revoke your consent by clicking on the link provided in each newsletter e-mail, by sending an e-mail to datenschutz@captrader.com or by sending a message to the contact details provided in section 1 of the privacy policy.

9. MAILCHIMP

We use the "MailChimp" service for the registration, dispatch and analysis of our newsletter. The provider is Rocket Science Group LLC, 675 Ponce De Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA.

The personal data provided by you when registering for the newsletter or subsequently supplemented by you will be stored on the servers of MailChimp in the USA.

With the services of MailChimp, we can analyze our newsletter actions. When you open an e-mail sent with MailChimp, a data file contained in the e-mail (so-called web beacon) connects to the MailChimp servers in the USA. In doing so, we record whether newsletter messages are opened, when they are opened and which links, if any, are clicked on. In addition, technical information is collected (e.g. time of retrieval, IP address, browser type and operating system). For technical reasons, this information can be assigned to individual newsletter recipients. However, it is neither our intention nor, if used, that of the dispatch service provider to observe individual users. The analyses serve us much more to recognize the reading habits of our users and to adapt our content to them or to send different content according to the interests of our users. The analysis is not possible if you have deactivated the display of images by default in your e-mail program. In this case, the newsletter will not be displayed in its entirety and you may not be able to use all of its functions. If you display the images manually, the above-mentioned analysis will take place.

The data processing is based on your consent (Art. 6 para. 1 p. 1 lit. a DSGVO). You can revoke this consent at any time by unsubscribing from the newsletter (see section 9 of the privacy policy). The legality of the data processing operations that have already taken place remains unaffected by the revocation.

The data you provide for the purpose of receiving the newsletter will be stored until you unsubscribe from the newsletter and will be deleted from our servers as well as from the servers of MailChimp after you unsubscribe from the newsletter. Data that has been stored by us for other purposes (e.g.

e-mail addresses for the customer area) are not affected by this. For further information, please refer to the privacy policy of MailChimp at: <https://mailchimp.com/legal/terms>.

Rocket Science Group LLC is certified under the EU-U.S. Privacy Shield. The registration is available at: <https://www.privacyshield.gov/participant?id=a2zt0000000TO6hAAG&status=Active>

Conclusion of an order processing contract

We have also concluded an order processing agreement (so-called "Data-Processing-Agreement") with Rocket Science Group LLC, in which we oblige them to protect the personal data of the recipients of our newsletter and not to pass them on to third parties. A sample of this agreement is available at: <https://mailchimp.com/legal/forms/data-processing-agreement/sample-agreement>

10. CONTACT FORM / LIVE CHAT

If you send us inquiries via contact form or live chat, your information including the contact data you provide there will be stored for the purpose of processing your inquiry and for follow-up questions. This data will not be forwarded without your consent.

The legal basis for processing the personal data entered in the contact form or live chat is Art. 6 para. 1 p. 1 lit. a DSGVO.

The data you enter in the contact form or live chat will remain with us until you request us to delete it, revoke your consent to store it, or the purpose for storing the data no longer applies (e.g. after we have completed processing your request). Mandatory legal provisions such as retention periods remain unaffected.

11. SOCIAL ICONS

So-called social icons (e.g. from Facebook, Twitter, YouTube, Google Plus, LinkedIn, XING, Instagram) are integrated on our website. These are only integrated on our website as a link to the corresponding services. After clicking on the embedded graphic, you will be redirected to the page of the respective provider, i.e. only then will personal data be transferred to the respective provider. For information on how your personal data is handled when using these websites, please refer to the respective provider's privacy policy.

12. AFFILIATE MARKETING

We use affilinet tracking cookies on our website to record sales/ leads. These affilinet tracking cookies do not store any personal data. Only information identifying the referring partner as well as an order number of the advertising material clicked on by the website visitor is recorded. This information is required for payment processing between us and the referring partner. The partner identification serves the allocation and determination of the commission to be paid to the mediating partner upon completion of a transaction. The legal basis is Art. 6 para. 1 p. 1 lit. f DSGVO.

Conclusion of order processing agreement

We have concluded an order processing contract with each of our mediating partners in which we oblige them to protect the personal data of the users of our website and not to pass it on to third parties.

13. YOUTUBE VIDEO INTEGRATION

We have embedded YouTube videos on our website, which are stored on <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 integrated in "extended data protection mode", i.e. no data about you as a user is transmitted to YouTube if you do not play the videos. Only when you play the videos, the data mentioned in paragraph 2 are transmitted. We have no influence on this data transmission.

By visiting the website, YouTube receives the information that you have accessed the corresponding subpage of our website. In addition, the data mentioned in paragraph 3 of the data protection declaration are transmitted. This occurs regardless of whether YouTube provides a user account via which you are logged in or whether no user account exists. If you are logged in to Google, your data will be directly assigned to your account. If you do not want the assignment with your profile at YouTube, you must log out before activating the button. YouTube stores your data as usage profiles and uses them for the purposes of advertising, market research and/or demand-oriented design of its website. Such an evaluation is carried out in particular (even for users who are not logged in) for the provision of tailored advertising and to inform other users of the social network about your activities on our website. You have the right to object to the creation of these user profiles, whereby you must contact YouTube to exercise this right.

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 on your rights and setting options to protect your privacy: <https://www.google.de/intl/de/policies/privacy>.

14. INTEGRATION OF GOOGLE MAPS

On this website we use the offer of Google Maps. This allows us to display interactive maps directly on the website and enables you to use the map function conveniently. The provider is Google LLC, 600 Amphitheatre Park-way, Mountain View, CA 94043 (USA).

By visiting the website, Google receives the information that you have called up the corresponding sub-page of our website. In addition, the data mentioned in section 3 of the data protection declaration 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 will be directly assigned to your account. If you do not want the assignment with your profile at Google, you must

log out before activating the button. Google stores your data as usage profiles and uses them for purposes of advertising, market research and/or demand-oriented design of its website. Such an evaluation is carried out in particular (even for users who are not logged in) for the provision of tailored advertising and to inform other users of the social network about your activities on our website. You have the right to object to the creation of these user profiles, whereby you must contact Google to exercise this right.

Google is certified under the EU-U.S. Privacy Shield. Registration is available at:

<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>

15. USE OF AN EKOMI WIDGET

eKomi enables us to include customer reviews on our website. The provider is eKomi Ltd, Markgrafenstr. 11, 10969 Berlin. This website loads a JavaScript code from Komi Ltd. for this purpose. If you have activated JavaScript in your Internet browser and are not running a JavaScript blocker, personal data may be transmitted to eKomi. We cannot make any statement about which data eKomi receives and to what extent this data is used by eKomi. The legal basis for the use of eKomi is Art. 6 para. 1 p. 1 lit. f DSGVO. Further information can be obtained directly from eKomi at <http://www.ekomi.de/de/datenschutz>.

Conclusion of an order processing contract

We have concluded an order processing agreement with eKomi, in which we oblige eKomi to protect the personal data of the users of our website and not to pass it on to third parties.

16. USE OF SERVICES BY UNBOUNCE

We use the service unbounce for certain pages of promotions and advertising campaigns (landing pages). The provider is unbounce Marketing Solutions Inc, 400-401 West Georgia Street, Vancouver, BC V6B 5A1, Canada.

These pages are hosted by unbounce and your browser communicates directly with unbounce so that your IP address is transmitted and cookies can be set. All information that you enter on these pages is also stored by unbounce. We are then provided with an evaluation of the activities. The legal basis for the use of unbounce is Art. 6 para. 1 p. 1 lit. f DSGVO. Further information on unbounce and data protection at unbounce can be found here: <http://unbounce.com/privacy/>

Conclusion of an order processing contract

We have concluded an order processing agreement with unbounce, in which we oblige unbounce to protect the personal data of the users of our website and not to pass it on to third parties.

17. GOOGLE RECAPTCHA

We integrate the function for detecting bots, e.g. when entering data in online forms ("ReCaptcha") of the provider Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

For more information on the purpose and scope of data collection and processing by Google, please refer to the privacy policy. There you will also find further information about your rights and possible settings to protect your privacy: <https://www.google.com/policies/privacy/>, Opt-Out:<https://adssettings.google.com/authenticated>. The legal basis for the use is our legitimate interest (i.e. verification of human hands) within the meaning of Art. 6 para. 1 lit. f. DSGVO.

Google is certified under the EU-U.S. Privacy Shield. This is an agreement between the European Union (EU) and the USA, which is intended to ensure compliance with European data protection standards in the USA. The registration is available at: <https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>.

Conclusion of an order processing agreement

We have concluded a data processing agreement with Google in which we oblige Google to protect the personal data of the users of our website and not to pass it on to third parties. .

18. CHANGE OF THE PRIVACY POLICY

In the course of the ongoing development of the Internet, it is necessary to adapt this privacy policy to changing circumstances on an ongoing basis. Such changes will be announced on this website in good time. ■

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