

Privacy information for the website wallstreet-online.ag
(V20180525)

Please note: This is a translation only. The only legally binding version of this document is the German version.

1 Subject of this information

- 1.1** With the following information, we, the responsible body named in section 2, would like to provide the users of the website www.wallstreet-online.ag an overview of the processing of their personal data by us and their rights under data protection law in accordance with Articles 12, 13, 14 and 21 of the General Data Protection Regulation (DS-GVO).
- 1.2** Which personal data is collected and processed by us in detail, i.e. which data is used by us, is determined to a large extent by the actions of the person visiting our websites (may be a registered user). Therefore, not all parts of this information will apply to the specific reader.
- 1.3** The term
- 1.3.1** "Party responsible", "party responsible for processing" or "Controller" refers to: the natural or legal person, public authority, agency or other body which alone or jointly with others determines the purposes and means of the processing of personal data.
- 1.3.2** "Party involved" or "Data Subject" refers to: natural persons identified or identifiable by a data processing operation.
- 1.3.3** "Processor" refers to: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the Controller.
- 1.3.4** "Personal data" refers to: any information relating to an identified or identifiable natural person (hereinafter "data subject"); an identifiable natural 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 to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 1.3.5** "Processing" refers to: any operation, which is performed upon personal data, whether or not by automatic means, such as collection, recording, organization, filing, storing, adapting or altering, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 1.3.6** "Consent" of the data subject refers to: any freely given specific, informed and unambiguous indication of his or her wishes in the form of a statement or other unambiguous affirmative act by which the data subject signifies his or her agreement to the processing of personal data relating to him or her.
- 1.3.7** "Collection" refers to: the obtaining of personal data, either with the cooperation of the data subject or with the cooperation of a third-party.

- 1.3.8** "Pseudonymization" refers to: the processing of personal data in such a way that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures which ensure that the personal data are not attributed to an identified or identifiable natural person.
- 1.3.9** "Profiling" refers to: any automated processing of personal data which consists in using such personal data to evaluate certain personal aspects relating to a natural person, in particular analyzing or predicting aspects relating to that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or change of location.

2 Who is responsible for data processing and whom can I contact?

The responsible party for data processing based on the use of the website is:

Wallstreet:online AG
Ritterstraße 11, 10969 Berlin

The contact details of the data protection officer appointed by us are:

Wallstreet:online AG
- The data protection officer -
Ritterstraße 11, 10969 Berlin

3 On what legal basis is my data processed?

- 3.1** In the course of using the website, we process users' personal data in accordance with the provisions of the EU General Data Protection Regulation (DS-GVO) and the German Federal Data Protection Act (BDSG-neu) for the fulfillment of contractual obligations or pre-contractual measures, on the basis of consent or in the context of a balancing of interests.
- 3.2** The website is an information and communication portal, so that the processing is materially based on the legal basis of weighing our legitimate interests or the legitimate interests of a third-party with the interests or fundamental rights and freedoms of the users of our website (Art. 6 para. 1 sentence 1 letter f DS-GVO).
- 3.3** We use content or service offers from third-party providers within our website on the basis of our legitimate interests (i.e. interest in the analysis, optimization and economic operation of our online offer within the meaning of Art. 6 (1) letter f DS-GVO) in order to integrate their content and services. This always requires that the third-party providers of this content perceive the IP address of the user, since without the IP address they could not send the content to their browser. The IP address is thus required for the display of this content. We strive to use only such content, whose respective providers use the IP address only for the delivery of the content. Third-party providers may also use so-called pixel tags (invisible graphics, also known as "web beacons") for statistical or marketing purposes. "Pixel tags" can be used to evaluate information such as visitor traffic on the pages of this website. The pseudonymous information may also be stored in cookies on the user's device and may contain, among other things, technical information about the browser and operating system, linked websites, time of visit,

and other information about the use of our online services, and such information may be connected to corresponding information gathered from other sources.

4 For what purpose is my data processed?

4.1 Log files

4.1.1 All computers and devices connected to the Internet are assigned an IP (Internet Protocol) address, usually in country-specific blocks. This can often be used to determine the country, state and location where the Internet connection is established. IP addresses must be used so that websites can be accessed on the Internet. Thus, website owners have access to the IP addresses of the users of their website.

4.1.2 In the case of purely informational use of our website, i.e. when users do not register or otherwise transmit information to us or enter into a contract with us, we may collect personally identifiable information in the form of the IP address. For technical reasons, users must use an IP address assigned to them by an access service when viewing our web pages. In principle, the following applies: the IP address is an individual "address" of a *device* (computer, smartphone, tablet) in a computer network. Exceptionally, an IP address could allow deducing the *person* and make him or her identifiable for us.

4.1.3 When our websites are simply called up by the program used by the visitor (user) to display Internet pages (the so-called "web browser" or "browser"), which the user has installed on the device used by him or her, the following information is transmitted to the web server used by us:

- IP address of the requesting device,
- Date and time of the call of our web pages,
- Information about the time difference between the requesting host and the web server,
- Content of the request or the file that was transferred to the user
- Access status (successful transmission, error etc.),
- Amount of data transferred in each case in bytes
- Website from which the user's access was made,
- Browser used by the user, the operating system, the interface, the language of the browser and the version of the browser software.

4.1.4 This information is stored by us on our web server in a so-called log file. This would allow us to at least indirectly establish a personal reference, i.e. by determining the owner of or the company owning the IP address via information from the access service providing the IP addresses. However, this is only possible if this access service is legally entitled to provide the information.

4.1.5 The aforementioned log files are processed by us for the following purposes:

- Ensuring a smooth connection to our website,
- Ensuring a comfortable use of our website,
- Evaluating the system security and stability of our website.

4.1.6 The legal basis for the collection is Art. 6 para. 1 sentence 1 f DS-GVO (Legitimate Interest of the Responsible Party). Our legitimate interest relates to the purposes listed above for the data collection. In no case do we use the collected data for

the purpose of drawing conclusions about the person using our websites; except for cases of intended disruptions to the functionality of our website or cases of misuse of our services. Apart from these exceptions, no personal usage profiles are therefore created and the data is generally not passed on to third-parties.

- 4.1.7** To protect against attacks and to ensure proper operation, all accesses to our online offer are temporarily and access-protected on a security system (firewall) automatically analyzed for possible risks, using the full IP address.
- 4.1.8** We will only attempt to find out which person is behind an IP address in the event of illegal attacks or misuse of our services. Otherwise, this information remains hidden from us and we do not attempt to obtain the data of the owner of an IP address.
- 4.1.9** Log files are stored for a maximum of seven days. Excluded from this short storage period are log files that are necessary for further tracking of accesses related to attacks and malfunctions. In addition, we mask IP addresses or they are stored with a non-reversible hash value so that they are no longer personally identifiable.
- 4.2** Own cookies, third-party cookies
 - 4.2.1** We use our own cookies when you visit our websites. Cookies are small text files that our web server sends to the device of the user of our websites and that are usually stored on the user devices' hard. They are not programs that can enter the user's system and cause damage. Although cookies can identify the user's device, cookies themselves do not store any personal data. Cookies do not cause any damage to the user's device and do not contain any viruses, "trojans" or other malware. Nevertheless, information is stored in a cookie that is related to the specific device used.
 - 4.2.2** The basic purpose of cookies is to evaluate the content of the cookie when the website is called up again, i.e. to recognize the user and his or her previous actions. If the cookie is deleted, for example because the user has deleted it or because it has deleted itself, then such recognition or the tracking of a usage action is not possible and also no "reading" of the cookie. For example, we use a cookie to determine whether a login process has been aborted (for example, due to session expiration), so that the user may re-enter at the correct point when he or she returns. We also use a cookie for the "stay logged in" function. If the checkmark is set for "stay logged in", this is noted in the cookie.
 - 4.2.3** So-called http-cookies (also "browser cookies") have a name and a corresponding value (content). These cookies are either deleted automatically when the browser is closed (so-called "transient" cookie) or have a programmed expiration date (so-called "persistent cookie"). We regularly use a session cookie, which receives a sequence of numbers as its value, the so-called session ID. A session ID makes it possible to assign several related requests of a user to this user, i.e. to his current "session", in order to make it easier for him to use the various areas of the websites. Our session cookies therefore support browser navigation. Session cookies are automatically deleted when the browser is closed. When the browser is closed, the session cookie is deleted, and when the expiration date expires, the "persistent" cookie is deleted.

- 4.2.4** No personal identification: With our own cookies, we do not use any technology that links information through cookies with the user's personal data. Thus, neither the identity of the user nor, for example, the e-mail address can be determined.
- 4.2.5** The legal basis for the collection of cookie data is Art. 6 (1) sentence 1 f DS-GVO (Legitimate Interest of the Responsible Party). Our legitimate interest related to the purpose of the cookies outlined above.
- 4.2.6** The browser used by the user allows the management of cookies and website data by way of data protection via the "Privacy" or "Privacy & Security" setting or within the scope of the otherwise named security settings before a website is called up. The user can thus prevent cookies from being set and user activity (i.e. "surfing behavior") from being tracked via website data, which may extend across websites. Thus, cookies and website data of the accessed website can generally be accepted and retained until they are no longer valid or until they expire. Also, cookies and website data from third-party providers, whose codes or scripts are embedded on the visited website, may or may not be accepted. Or cookies and website data may always be rejected. For the most part, web browsers automatically accept cookies through default settings. It is therefore up to the user to decide whether and how to set this behavior of the browser according to own preferences. If cookies and website data are not accepted by browser settings, if activity tracking (website tracking) is turned off, or if "Java script" is not permitted, the websites accessed may not function in whole or in part.
- 4.2.7** Users can also delete cookies via the security settings of their browser in whole or in part at any time, for example after ending their online session. Then, when a session is restarted, no cookies or only those that have not been deleted will remain on the user's device. This means that the user's device cannot be "recognized" when a website is called up again.
- 4.2.8** External cookies (third-party cookies) are also used via our websites and the third-party services or third-party advertisements available herein and are stored on the user's device, unless the user prevents this through the settings of the web browser in use. These third-party providers can be companies that provide analysis tools or displayed advertisements, social networks, for example, if a like or share button is provided on the website. The legal basis for the use of third-party cookies is Art. 6 para. 1 sentence 1 letter f DS-GVO (legitimate interest of both us and a third-party). Our legitimate interest follows from the otherwise impossible integration of the services and functions of the service providers and advertisers, so that the financing through advertising of our service is not secured, as well as from the interests of the third-party service providers to obtain consideration for their service by creating effective and "personalized" advertising opportunities.
- 4.2.9** The user may also prevent the setting of third-party cookies in accordance with the provisions of 4.4.6 and 4.4.7.

5 Which categories of data are processed?

The kind of personal data processed and how it is used depends largely on the services used or agreed upon by and with a user or a registered user. Therefore, not all parts of the below information will apply to the data subject. Categories of data to be processed are or may be:

- Electronic identification data, e.g.: IP addresses, cookies, log files.

6 What is the source of the data processed?

- 6.1** The processing of personal data, if any, that we collect from users in the course of providing the services of our website, we usually obtain with their cooperation, namely by the users using the website.

7 Who receives my data?

- 7.1** A transfer or transmission of the personal data of the data subject to third-parties for cases other than those described in this document only takes place if:
- the data subject has given his or her expressed consent in accordance with Art. 6 (1) sentence 1 letter a DS-GVO,
 - the disclosure is necessary for the assertion, exercise or defense of legal claims pursuant to Art. 6 (1) sentence 1 letter f DS-GVO and there is no reason to assume that the data subject has an overriding interest worthy of protection in the non-disclosure of his or her data,
 - there is a legal obligation for the disclosure pursuant to Art. 6 (1) sentence 1 letter c DS-GVO, and
 - this disclosure is legally permissible and necessary for the processing of contractual relationships with the data subject pursuant to Art. 6 (1) sentence 1 letter b DS-GVO.
- 7.2** Within our company, access to the data of the data subject is granted to those persons who need it to fulfill our contractual and legal obligations. Contract processors, service providers and agents (subcontractors) used by us as well as advertising partners may also receive data for these purposes if they comply with our instructions under data protection law.
- 7.3** Recipients may also be public bodies in the event of a legal or official obligation.
- 7.4** We use processors in particular for our web analytics services, server hosting services, and for shredding files and sending our newsletters.

8 Will my data be transferred to a third country?

- 8.1** Our data processing is carried out on servers located in Germany.
- 8.2** There is generally no intention to transfer personal data to a third country (a country outside the European Union or the European Economic Area).
- 8.3** A data transfer to a third country only takes place if an adequacy decision of the European Commission is available or if we have suitable guarantees including binding internal data protection regulations. We will then refer to the appropriate or adequate safeguards and indicate how to obtain a copy of the data or where they are available.
- 8.4** We are permitted to transfer data to a third country if the statutory exceptional conditions are met, in particular if the data subject has given his or her expressed consent to do so or if the transfer is necessary for the performance of a contract

between the data subject and us or for the performance of pre-contractual measures at the request of the data subject or if the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject by us with another natural or legal person.

9 How long will my data be stored?

- 9.1** In the provisions of this data protection information, we have already provided information at various points on the storage period or the criteria for determining this period. We store the personal data collected by us for as long as is necessary for our purposes or the data subject has consented to storage beyond this period in accordance with the provisions of the General Data Protection Regulation.
- 9.2** The personal data collected for the purposes of a contract shall also be stored until the expiry of the statutory retention obligations arising for our activities. Thereafter, they will be deleted unless processing is still necessary for the fulfillment of a legal obligation to which we are subject.
- 9.3** The retention and documentation obligations under tax and commercial law that come into consideration provide for a retention obligation of six or ten years for the commercial documents specified in Sections 238 and 257 of the German Commercial Code. Corresponding provisions are contained in Section 147 of the German Fiscal Code (Abgabenordnung) for the retention of the documents referred to therein.
- 9.4** The expiry of the retention period does not automatically result in a deletion obligation, as there may still be a justified interest in archiving data, e.g. in order to be able to provide information in the event of legal disputes. This also applies to cases of preservation of evidence within the framework of the statute of limitations. According to Sections 195 et seq. of the German Civil Code (BGB), these limitation periods can be up to 30 years, with the regular limitation period being three years.

10 What data protection rights do I have?

- 10.1** Every person affected by our data processing has the right to information according to Art. 15 DS-GVO, the right to correction according to Art. 16 DS-GVO, the right to deletion according to Art. 17 DS-GVO, the right to restriction of processing according to Art. 18 DS-GVO, the right to objection according to Art. 21 DS-GVO as well as the right to data portability according to Art. 20 DS-GVO if the legal requirements are met. With regard to the right to information and the right to deletion, the restrictions pursuant to Sections 34 and 35 BDSG-neu apply.

10.2 Individual Right of Objection in Case of Weighing of Interests

- 10.2.1** Data subjects have the right to object to the processing of their personal data on grounds relating to their particular situation. The prerequisite for this is that the data processing takes place on the basis of our balancing of interests pursuant to Art. 6 (1) (f) DS-GVO. These cases have been described in this data protection information. In the event of an objection, we will no longer process the personal data. Unless we can demonstrate compelling legitimate grounds for processing such data that override the interests, rights and freedoms of the data subject. This

is also the case if the personal data serve the assertion, exercise or defense of legal claims.

10.2.2 The objection can be made informally, stating the subject "Objection", stating the name, address and date of birth of the data subject, and should be addressed to: wallstreet:online AG, Ritterstraße 11, 10969 Berlin.

10.2.3 As far as technically possible, we provide the data subject with an opportunity to exercise the objection by means of an automated procedure using technical specifications. This can be done, for example, via our website or via functions of the Internet browser used by the user of our websites. These cases are also described in this data protection information.

10.3 Revocation of consent

10.3.1 If the data subject has given us consent to process personal data for specific purposes, the processing of such data shall be lawful. The data subject may revoke this consent at any time. This also applies to the revocation of declarations of consent that were given to us by the data subject prior to the applicability of the DS-GVO, i.e. prior to May 25, 2018. The revocation of consent does not affect the lawfulness of the data processed until the revocation.

10.3.2 The revocation of consent can be made informally, stating the subject "Revocation", stating the name, address and date of birth of the data subject, and should be addressed to: wallstreet:online AG, Ritterstraße 11, 10969 Berlin.

10.3.3 As far as technically possible, we will provide the data subject with an option to declare the revocation as easily as the consent was declared by the data subject.

10.4 Right of complaint

Data subjects have the right to complain to a supervisory authority about us with regard to our handling of their personal data.

11 Do I have to provide my data?

The use of our website is possible without the user having to provide personal data. Anonymous use is not excluded by the design of the website.

12 Will my data be used for automated decision-making?

No! We do not use fully automated decision-making (including profiling) in accordance with Art. 22 DS-GVO to establish and implement contractual relationships with users. No "scoring" takes place.

13 Data security

13.1 During the website visit, we use the widespread SSL (Secure Socket Layer) procedure in conjunction with the highest encryption level supported by the user's browser to protect communication with us. As a rule, this is a 256-bit encryption. If the user's browser does not support 256-bit encryption, we use 128-bit v3 technology instead. Whether an individual page of our website is encrypted can

be seen by the closed display of the key or the lock symbol in the status bar of the user's browser.

- 13.2** We also use appropriate technical and organizational security measures to protect the personal data of the data subject that we have collected against accidental or intentional manipulation, partial or complete loss, destruction or against unauthorized access by third-parties. Our security measures are continuously improved in line with technological developments.

14 Further information on data protection

For special groups of affected persons or in certain situations of the collection of personal data, we inform in due course, providing specified data protection information.

15 Amendment of this data protection information

This data protection information does not require the consent of the data subject and is subject to regular review with regard to any need for amendment. The respective previous version will be archived by us in the event of replacement by a new version.