

Privacy Policy

DR Investment Control GmbH (hereinafter: justETF) is committed to protecting your privacy and personal data. Personal data is collected and used strictly within the legal limits of applicable data protection law. With this privacy policy, we inform you of the personal data we collect and what purpose we use it for. You can access this information at any time on our website.

Data controller/Contact

The data controller for the purpose of data protection law is:

DR Investment Control GmbH, Widmaierstr. 110, 70567 Stuttgart, Germany

Please feel free to address any questions or concerns regarding data protection/privacy to privacy@justetf.com.

Scope of data protection

Data protection concerns personal data. This is defined in Sec 3 para. 1 of the German Federal Data Protection Act ("Bundesdatenschutzgesetz"; "BDSG") as any information concerning the personal and material circumstances of an identified or identifiable individual. This includes information like name, postal address, e-mail address or telephone number, but also usage data in some cases. Usage data are data required to use our website, for instance information about start, end and extent of website use as well as login data.

Any personal data (contact form, registration, newsletter, conclusion of membership) is transferred over SSL encrypted connections (indicated by the padlock symbol in your browser and the URL field).

Collection and use of your data

Automatic data collection

When you access our websites, your browser automatically transmits certain data for technical reasons. The following data are stored separately from any other data you may transmit to us:

- Date and time of access,
- Browser type and version,
- Operating system,
- URL of the website visited prior to ours,
- Amount of sent data.

These data are stored for purely technical reasons and are never associated with any particular individual.

Data entered by user

In order to fully enjoy the services of justETF, you are required to register. For the free version justETF "Free", we only require your e-mail address and your full name. In order to use our paid services (e.g. justETF Premium and justETF Professional), you also need to enter, your complete address and your payment information, such as bank account data or credit card information. These data are required to enable you to fully enjoy the services of justETF. Not least, justETF needs these and potentially additional data in order to react to your requests, questions and criticism.

Of course, it is entirely up to you what data you want to share with justETF. That is justETF's commitment to the principle of data economy. If you do not provide certain information to justETF, this may however mean that you will not be able to use all of justETF's features.

justETF reserves the right to occasionally obtain information from other sources to update its databases. In individual cases, and only where appropriate, justETF will obtain information from third parties (such as credit reporting agencies) about a customer's payment history; such information will only be used to uncover any abuse, in particular fraud.

justETF uses your personal data to provide a secure, efficient and customer-centered user experience on the platform, e.g.

- access to different features in the personal login areas, and
- averting harm from justETF users by using the Terms of Service and the stored data to prevent individual users from abusing the platform.

If you consent, justETF will use your personal data to provide you with certain offers and information customized to your needs and inform you of news, such as improved service offerings and other events. You may opt out of the use of your data for such opinion and market research purposes at any time with effect for the future by notifying us accordingly at privacy@justetf.com.

The portfolio data you enter will not be shared with any third party or otherwise published at any time. We only use this data to create entirely anonymous statistics.

Sharing data

If it serves investigations of illegal use of the platform or is required to pursue legal claims, personal data may be shared with law enforcement agencies and third party victims. Such transfer of data will be made only where there is specific evidence for

illegal or abusive conduct. Data may further be shared where it serves the enforcement of terms of use or other contractual agreements. justETF is furthermore legally obliged to disclose certain information to certain public entities upon request. Such entities include law enforcement agencies that investigate administrative offences subject to fines, and tax authorities.

From time to time, we may require the assistance of contractually hired third parties and external service providers in order to provide our services, for instance in the domains contacting you (by mail or e-mail), maintaining our customer lists, analysing databases, advertisements (only where you have explicitly consented beforehand), processing of payments (direct debit, credit card) and customer service. In these cases, we share information with such companies or individuals to enable them to carry out their tasks. Such external service providers are carefully selected and regularly checked in order to ensure your privacy. Service providers may only use the data for the purposes specified by justETF. Service providers are furthermore contractually obliged by justETF to treat data strictly in accordance with this privacy policy and German data protection law.

As our business evolves, the structure of justETF may change, for instance by a change in legal form or creation, acquisition or sale of subsidiaries, branches or parts of a company. In the course of such transactions, customer data will be transferred together with the relevant part of the company being transferred. In each case of a transfer of personal data to third parties to the extent described above, justETF will ensure that such transfer is made in accordance with this privacy policy and applicable data protection law.

Newsletter

justETF offers a free newsletter service. In its newsletter, justETF informs you about company news and other topics related to capital markets. In order to receive the e-mail newsletter, we require your name and e-mail address. You may enter this information during the registration process or at www.justetf.com/newsletter. In the latter case, we only store and use your e-mail address for the purpose of sending the newsletter.

You may opt out of the newsletter at any time. Each newsletter contains information on how to opt out of receiving newsletters with effect for the future.

Cookies

justETF stores so-called "Cookies" to provide you with a wide range of functionalities and enhance website usage comfort. "Cookies" are tiny files stored on your computer through your browser. If you do not wish to receive "Cookies", you may deactivate storing "Cookies" on your computer by changing your browser settings accordingly. Please note that the functioning of the website may be impaired and the range of functionalities may be limited if you deactivate "Cookies".

Use of Google Universal Analytics, Conversion Tracking and Remarketing

This website uses Google Universal Analytics, a web analytics service provided by Google Inc. („Google“). Google Analytics also uses so-called “Cookies”, text files that are stored on your computer and permit an analysis of your use of the website. The information about your website use generated by the Cookie is usually transmitted to a server controlled by Google in the USA and is stored there. However, Google uses IP anonymization in one of the member states of the European Union or the European Economic Area to truncate your IP address prior to transmission to the USA. Only in exceptional cases will the IP address be transmitted first to a Google server in the USA and truncated there. At the direction of the operator of this website, Google uses this information to analyse your use of the website, to generate reports about website activities for website operators and to provide further services related to website and internet use. The IP address transmitted to Google by your browser through the use of Google Universal Analytics is not combined with any other Google data. Google may also share such information with third parties to the extent it is legally required to do so and/or to the extent third parties process data on behalf of Google. You may deactivate storing “Cookies” on your computer by changing your browser settings accordingly. Please note that the functioning of the website may be impaired and the range of functionalities may be limited if you deactivate “Cookies”. As a part of our use of Google Universal Analytics, we may also provide pseudonymous UserIDs to Google in order to enable Google to associate website access from different devices with one usage profile. The UserID is a random string of numbers that does not allow any connection with personal data. Google cannot identify you through the UserID. You may also deactivate any collection or processing of data related to your use of the website (including your IP address) by Google, by downloading and installing the browser add-on available [here](#).

This website furthermore uses Google Conversion Tracking. This means that a Google Adwords cookie is stored on your machine if you have reached the website via a Google ad. These cookies expire after 30 days and do not serve any purpose of personal identification. If the user visits certain pages on the websites of the AdWords customer (justETF.com) and the cookie has not expired, Google and the customer can see that the user has clicked an ad and has been routed to that page. Each AdWords user has a different cookie. Cookies therefore cannot be tracked across websites of different AdWords customers. The information collected with the help of the conversion cookie are used to create conversion statistics for AdWords customers who have opted for Conversion Tracking. Such AdWords customers are informed of the number of users who have clicked an ad and have been routed to a page with the Conversion Tracking tag. They do not receive any information that lets them personally identify users. If you do not wish to participate in the tracking mechanism, you can refuse the cookie that is required for tracking – for example by setting your browser not to accept any cookies. You can also deactivate cookies for Conversion Tracking by setting your browser to refuse cookies only from the domain „googleadservices.com“.

Furthermore, justETF uses the Google program for interest-related advertising, the so-called Google Remarketing. justETF places advertisements on websites on the Internet using stored cookies based on earlier visits of the user on the justETF website. You can deactivate the use of cookies by Google for this purpose by going to [Google's](#)

[advertisement deactivation page](#). Alternatively, users may deactivate third party cookies by going to the deactivation page of the [Network Advertising Initiative](#).

By using justETF.com, you consent to the processing of your data by Google in the aforementioned manner and for the aforementioned purposes. Please note that Google has their own privacy policies, which are independent of those of justETF. We are not responsible or liable for such policies and procedures. Please consult the [Google privacy policy](#) prior to using this website.

Use of Google DoubleClick to provide Banner Ads on the Portal

We use Google's DoubleClick-Platform to enable individual aspects of our offering. DoubleClick also uses cookies in order to support advertising customers and publishers in placing and managing their ads on the Internet, and in order to provide relevant banner ads to you. The information generated by the cookie regarding your use of the website is transferred to a Google DoubleClick server in the USA and stored there in an entirely pseudonymous format, i.e. using only a pseudonym (e.g. a Cookie ID). When you visit our website or a different website within the Google advertisement network, a DoubleClick cookie is stored in your browser. If your browser has already accepted a DoubleClick cookie, no further DoubleClick cookie is stored. If you do not wish to receive DoubleClick cookies, you can opt out using the [advertisement preferences manager](#).

Further information on the use of DoubleClick cookies in connection with the DoubleClick advertising program can be found in the [DoubleClick privacy FAQs](#).

Deletion of your data

To the extent your data are no longer required for the aforementioned purposes, they are deleted. If you delete your user account, your profile will be entirely and finally deleted. To the extent data must be retained for legal reasons, they are blocked and will not be available for use.

Right to access and correction

Of course you are entitled, upon request, to disclosure regarding your personal data that we are storing. You are also entitled to have any incorrect data corrected and rights to blocking or deletion. Please address any requests in such matters to privacy@justetf.com or write to us at the address stated above.

Changes to privacy policy

justETF reserves the right to modify this privacy policy. The current version of the privacy policy is always accessible at www.justetf.com/dataprivacy.

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