

## Privacy Policy

justETF 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 within our online offering on [www.justETF.com](http://www.justETF.com), its related websites, features and content as well as external online presences such as social media profiles (hereinafter referred to collectively as "online offering"). With regards to the terminology used, e.g. "processing" or "controller", we refer to the definitions in Article 4 of the General Data Protection Regulation (GDPR).

You can retrieve this information at any time at [www.justetf.com/dataprivacy](http://www.justetf.com/dataprivacy). This privacy policy is a copy of the German original which can be downloaded under [https://www.justetf.com/documents/justETF\\_Datenschutzerklaerung.pdf](https://www.justetf.com/documents/justETF_Datenschutzerklaerung.pdf)

### 1. Controller

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

justETF GmbH  
Bahnhofstr. 26  
72138 Kirchentellinsfurt  
Germany

Managing Director: Dominique Riedl, Petra Riedl

Legal notice: [www.justetf.com/legal-notice](http://www.justetf.com/legal-notice)

Please feel free to address any questions or concerns regarding data protection/privacy to [privacy@justetf.com](mailto:privacy@justetf.com).

### 2. Data protection officer

The data protection officer of the data controller is the following:

DataCo GmbH  
Mr Robert Maeckle  
Dachauer Str. 65  
DE-80335 Munich  
Germany  
Phone: +49 89 740045840  
E-Mail: [datenschutz@dataguard.de](mailto:datenschutz@dataguard.de)  
Internet: [www.dataguard.de/](http://www.dataguard.de/)

### 3. Types of processed personal data

- Base data (e.g. name, address)
- Contact details (e.g. email, phone number)

- Content (e.g. text, photographs, videos)
- Usage data (e.g. referrer websites, interest in content, access times)
- Meta-/communication data (e.g. device information, IP address)

#### **4. Business-related processing**

In addition, we process

- Contract data (e.g. contract objective, term, category status)
- Payment data (e.g. bank details, payment history)

from our customers, prospects and business partners for the purpose of providing contractual services, customer service and customer care, marketing, advertising and market research.

#### **5. Category of data subject**

Visitors and users of the online offering (in the following we refer to the affected persons as "users").

#### **6. Purpose of processing**

- Providing the online offering, its features and content
- Answering contact requests and communication with users
- Security measures
- Marketing purposes

#### **7. Definitions used in this data privacy**

“Personal data” means any information relating to an identified or identifiable natural person (“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.

“Processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“Pseudonymisation” means the processing of personal data in such a manner 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 organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

“Profiling” means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

“Controller” means the natural or legal person, public authority, agency or other bodies which, alone or jointly with others, determines the purposes and means of the processing of personal data.

“Processor” means a natural or legal person, public authority, agency or other bodies which processes personal data on behalf of the controller.

## **8. Relevant legal bases**

In accordance with Art. 13 GDPR, we inform you about the legal basis of our data processing. Unless the legal basis in the data protection declaration is mentioned, the following applies: The legal basis for obtaining consent is Article 6 (1) lit. a and Art. 7 GDPR, the legal basis for the processing for delivering our services and the execution of contractual obligations as well as the response to inquiries is Art. 6 (1) lit. b GDPR, the legal basis for processing in order to fulfil our legal obligations is Art. 6 (1) lit. c GDPR, and the legal basis for processing in order to safeguard our legitimate interests is Article 6 (1) lit. f GDPR. In the event that vital interests of the data subject or another natural person require the processing of personal data, Art. 6 (1) lit. d GDPR applies as a legal basis.

## **9. Organisational and technical measures to protect your data**

We take appropriate organisational and technical measures in accordance with Art. 32 GDPR, taking into account the current state of technology, the implementation costs and the nature, scope, circumstances and purposes of the processing as well as the different likelihood and severity of the risk to the rights and freedoms of natural persons to ensure a level of protection appropriate to the risk.

Measures include, in particular, ensuring the confidentiality, integrity and availability of data by controlling physical access to the data, as well as their access, input, disclosure, availability and separation. We have also set up procedures to ensure data subject rights, data deletion and data vulnerability. Furthermore, we consider the protection of personal data already in the development, or selection of hardware, software and procedures, according to the principle of data protection through technology design and privacy-friendly default settings (Art. 25 GDPR).

## **10. Collaboration with processors and third parties**

If, in the context of our processing, we disclose data to other persons and companies (contract processors or third parties), transmit them to them or otherwise grant access to the data, this will only be done on the basis of a legal permission, you have consented to it, a legal obligation requires it or based on our legitimate interests.

If we commission third parties to process data on the basis of a so-called "data processing contract", this is done on the basis of Art. 28 GDPR.

## **11. Transfers to third countries**

If we process data in a third country (i.e. outside the European Union (EU) or the European Economic Area (EEA)) or in the context of the use of third-party services or disclosure or transmission of data to third parties, this will only be done if it is to fulfil our (pre) contractual obligations, on the basis of your consent, on the basis of a legal obligation or on the basis of our legitimate interests. Subject to legal or contractual permissions, we process or have the data processed in a third country only in the presence of the special conditions of Art. 44 et seq. GDPR. That the processing is e.g. on the basis of specific guarantees, such as the officially recognised level of data protection (e.g. for the US through the Privacy Shield) or compliance with officially recognised special contractual obligations (so-called "standard contractual clauses").

## **12. Your rights in relation to personal data and how to exercise them**

### Right of access to personal data

You have the right, at any time upon request, to obtain information from us about your personal data in the scope of Art. 15 GDPR. For this, you can submit a request to [privacy@justetf.com](mailto:privacy@justetf.com) or to the address given above.

### Right to rectification

You have the right to request immediate correction of your personal data if it is incorrect. For this, please contact the contact address listed above or make changes yourself under the menu item "Settings".

Of course, you have the right to request information about the data stored by justETF on your person. You also have the right to correct incorrect data, blockage and deletion. Please contact us at [privacy@justetf.com](mailto:privacy@justetf.com) or by mail to the above-mentioned contact.

### Right to erasure ('right to be forgotten')

You have the right to demand the deletion of your personal data under the conditions described in Art. 17 GDPR. In particular, those conditions provide for a right of erasure if the personal data are no longer necessary for the purposes for which they were collected or otherwise processed and in cases of unlawful processing, opposition or extinction under Union law or the law of the Member State to which we are subject. For the period of data storage, see also point "Change of purpose" of this privacy policy. To assert your right, please contact the above-mentioned contact.

#### Right to restriction of processing

You have the right to demand that we restrict processing in accordance with Art. 18 GDPR. This right exists in particular if the accuracy of the personal data between the user and us is controversial, for the period of time required to verify correctness and in the event that the user requires limited processing in the case of an existing right of deletion instead of deletion; and in the event that the data is no longer required for the purposes we are pursuing, but the user is required to assert, exercise or defend legal claims, and if the successful exercise of an objection between us and the user is still controversial. To assert your right, please contact the above-mentioned contact.

#### Right to data portability

You have the right to receive from us the personal data relating to you which you have provided to us in a structured, common, machine-readable format in accordance with Art. 20 GDPR. To assert your right, please contact the above-mentioned contact.

#### Right of appeal

You also have the right to lodge a complaint with the relevant supervisory authority for complaints.

#### Right to withdraw

You have the right to withdraw your consent at any time in accordance with Art. 7 (3) GDPR with effect for the future.

#### Right to object

You have the right to object against the processing of your personal data on the basis of Art. 21 GDPR at any time, for reasons arising out of your particular situation. This is especially true for personal data processed according to Art. 6 para. 1 lit. e or f GDPR. We will cease the processing of your personal information unless we can establish compelling legitimate grounds for processing that outweigh your interests, rights and freedoms, or the processing is for the purpose of enforcing, pursuing or defending legal claims.

### **13. Cookies and right to object for direct marketing purposes**

"Cookies" are small files that are stored on users' computers. Different information can be stored within the cookies. A cookie is primarily used to store the information about a user (or the device on which the cookie is stored) during or after his visit to an online offer. Temporary cookies, or "session cookies" or "transient cookies", are cookies that are deleted after a user leaves an online service and closes his browser. In such a cookie, e.g. the contents of a shopping cart in an online shop or a login status are saved. The term "permanent" or "persistent" refers to cookies that remain stored even after the browser has been closed.

Thus, e.g. the login status will be saved if users visit it after several days. Likewise, in such a cookie the interests of the users can be stored, which are used for measurement of reach or marketing purposes. A "third-party cookie" refers to cookies that are offered by providers other than the person responsible for providing the online offer (otherwise, if only their cookies are called "first-party cookies").

We can use temporary and permanent cookies and clarify this in the context of our privacy policy.

If you do not want cookies stored on your computer, you will be asked to disable the corresponding option in the system settings of your browser. Saved cookies can be deleted in the system settings of the browser. The exclusion of cookies can lead to functional restrictions of our online offering.

A general objection to the use of cookies used for online marketing purposes can be done with a variety of services, especially in the case of tracking, via the US website <https://www.aboutads.info/choices/> or the EU site <https://www.youronlinechoices.com/>. The same result can be achieved by switching cookies off in the settings of the browser. Again, the exclusion of cookies can lead to functional restrictions of our online offering.

#### **14. Automatic collection of personal data**

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 website visited prior to ours (referrer website)
- Amount of sent data

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

#### **15. Registration and user account**

Users can create a user account. As part of the registration, the required mandatory information is communicated to the users and based on Art. 6 para. 1 lit. b GDPR processed for purposes of providing the user account. The processed data includes, in particular, the login information (name, password, country of origin, investor type and an email address). The data entered during registration will be used for the purpose of using the user account and its purpose.

Users will be informed via email about relevant information regarding their user account, e.g. technical changes, portfolio reports and portfolio alert notifications.

If users have terminated their user account, their data will be deleted with respect to the user account, subject to a statutory retention requirement. It is the responsibility of the users to

secure their data upon termination before the end of the contract. We are entitled to irretrievably delete all user data stored during the term of the contract.

In the context of the use of our registration and login process as well as the use of the user account, the IP address and the time of the respective user action will be saved. The storage is based on our legitimate interests, as well as the user's protection against misuse and other unauthorised use. A transfer of these data to third parties does not take place unless it is necessary for the prosecution of our claims or there is a legal obligation in accordance with Art. 6 (1) lit. c GDPR. The IP addresses will be anonymised or deleted after 7 days at the latest.

### Portfolio data

In addition, you may voluntarily enter virtual portfolio transaction data (collectively referred to as "portfolio data") and a bank name in your user account. We collect this data in order to provide you with the corresponding functions of our portfolio management on justETF, Art. 6 (1) lit. b GDPR.

You are not required to provide the above voluntary information. Without this data, however, we will not be able to provide you with the appropriate features of our portfolio management.

The portfolio data you enter will never be disclosed to third parties or otherwise disclosed. They are only used to produce fully anonymous statistics.

## **16. Order processing of paid subscriptions**

We process the data of our customers during the ordering process of paid subscriptions in our online shop to enable them to select and order the selected products and services as well as pay for them and use them.

The processed data includes base data, contact details, communication data, contract data, payment data and persons affected by the processing belong to our customers, prospects and other business partners. The processing is for the purpose of providing contractual services in the context of the operation of an online shop, billing, provision and customer service.

Processing is based on Art. 6 (1) lit. b (execution of order transactions) and c (legally required archiving) GDPR. The information marked as required for the establishment and fulfilment of the contract is required. We disclose the data to third parties only in the context of the provision, payment or within the framework of the legal permissions and obligations to legal advisers and authorities.

The deletion takes place after expiry of legal warranty and comparable obligations, the necessity of keeping the data is checked every three years; in the case of legal archiving obligations, the deletion takes place after its expiration (end of commercial law (6 years) and tax law (10 years) retention obligation).

## **17. External payment service provider**

All payment processes are processed via the payment service provider BS PAYONE GmbH (“BS PAYONE”), Lyoner Strasse 9, 60528 Frankfurt / Main, Germany, to whom we provide your information communicated during the ordering process in addition to the information about your order pursuant to Art. 6 (1) lit. b GDPR. The transfer of your data is exclusively for the purpose of payment processing and subscription management with the payment service provider BS PAYONE and only insofar as it is necessary for this purpose.

The current privacy policy of BS PAYONE can be found at <https://www.payone.com/datenschutz/>

Amongst the data processed by the payment service provider are base data, e.g. the name and the address, bank data, such as account numbers or credit card numbers. The information is required to complete the transactions. Credit card-related information is only stored and processed by the payment service provider.

## **18. Administration, financial accounting, office organisation, contact management**

We process data in the context of administrative tasks and organisation of our business, financial accounting and compliance with legal obligations, such as archiving. In doing so, we process the same data that we process in the course of rendering our contractual services. The processing principles are Art. 6 (1) lit. c. GDPR, Art. 6 (1) lit. f. GDPR. The processing affects customers, prospects, business partners and website visitors. The purpose and interest in processing lie in administration, financial accounting, office organisation, data archiving, that is, tasks that serve to maintain our business, perform our duties and provide our services. The deletion of the data in terms of contractual performance and contractual communication corresponds to the information provided in these processing activities.

We disclose or transmit data to the financial administration, consultants, such as tax accountants or auditors, and other fee agents and payment service providers.

Furthermore, based on our business interests, we store information about suppliers, promoters and other business partners, e.g. for later contact. We generally store this majority of company-related data permanently.

## **19. Business analysis and market research**

In order to operate our business economically, to recognise market trends, wishes of the contractors and users, we analyse the data available to us for business transactions, contracts, inquiries, etc. We process base data, contact details, communication data, contract data, payment data, usage data, metadata based on the nature of Art. 6 (1) lit. f GDPR, whereby the data subjects include contractual partners, interested parties, customers, visitors and users of our online offer.

The analyses are carried out for the purpose of business analysis, marketing and market research. In doing so, we can take advantage of profiles of registered users with information, e.g. take into account their services. The analyses serve us to increase the user-friendliness,



the optimisation of our offer and business economics. The analyses are for us alone and will not be disclosed externally unless they are anonymous, aggregated value reports.

If these analyses or profiles are personal, they will be deleted or anonymised upon termination of the users, otherwise after two years from the conclusion of the contract. Incidentally, the overall business analyses and general trend projections are created anonymously if possible.

## 20. Hosting and email sending

The hosting services we use are designed to provide the following services: infrastructure and platform services, computing capacity, storage and database services, emailing, security and technical maintenance services we use to operate this online offering.

Here we, or our hosting provider, process base data, contact details, content data, contract data, usage data, meta and communication data of customers, interested parties and visitors to this online offering on the basis of our legitimate interests to provide an efficient and secure online offer acc. Art. 6 (1) lit. f GDPR in combination with Art. 28 GDPR (conclusion of data processing contract).

Hosting providers we use include:

Amazon Web Services, Inc., 410 Terry Avenue North, Seattle WA 98109, USA  
Amazon is certified under the Privacy Shield Agreement, which provides a guarantee to comply with European privacy legislation:  
<https://www.privacyshield.gov/participant?id=a2zt0000000TOWQAA4&status=Active>

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA  
Google is certified under the Privacy Shield Agreement, which provides a guarantee to comply with European privacy legislation:  
<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>

## 21. Newsletter

With the following information, we inform you about the content of our newsletter as well as the registration, sending and statistical evaluation procedures as well as your right of objection. By subscribing to our newsletter, you agree to the receipt and the procedures described.

Content of the newsletter: We send newsletters, emails and other electronic notifications with advertising information (hereinafter "newsletter") only with the consent of the recipient or legal permission. Insofar as the content of a newsletter is concretely described, they are authoritative for the consent of the users. Among others, our newsletter contains information about our services and us.

Double opt-in and logging: Registration for our newsletter is done in a so-called double-opt-in procedure. You receive an email asking you to confirm your registration after you registered (e.g. at [www.justetf.com/newsletter](http://www.justetf.com/newsletter)). This confirmation is necessary so that nobody can register with external email addresses. The registration for the newsletter will be logged in order to prove the registration process according to the legal requirements. This includes

saving the registration and confirmation times. Likewise, changes to your data stored with the newsletter service provider will be logged.

Sign-up credentials: To sign up for the newsletter, it is sufficient to provide your email address. Optionally, we ask you to give a surname and first name for a personal salutation.

The sending of the newsletter and the associated performance measurement are based on the consent of the recipients acc. Art. 6 (1) lit. a, Art. 7 GDPR in combination with Art. 7 (2) No. 3 UWG (German law against unfair competition) or if consent is not required, based on our legitimate interests in the direct marketing acc. Art. 6 (1) lit. f GDPR in combination with Art. 7 (3) UWG (German law against unfair competition).

The logging of the registration process is based on our legitimate interests in accordance with Art. 6 (1) lit. f GDPR. Our interest lies in the use of a user-friendly and secure newsletter system, which serves both our business interests and the expectations of the users and also allows us to prove our consent.

Termination / Revocation: You can terminate the receipt of our newsletter at any time, i.e. revoke your consent. A link to cancel the newsletter can be found at the end of each newsletter. We may save the email addresses for up to three years on the basis of our legitimate interests before we delete them in order to provide evidence of prior consent. The processing of this data is limited to the purpose of a possible defence against claims. An individual request for cancellation is possible at any time, provided that at the same time the former existence of consent is confirmed.

The newsletter is sent by the newsletter service provider CleverReach GmbH & Co. KG, Mühlenstr. 43, 26180 Rastede, Germany. The privacy policy of the shipping service provider can be viewed here: <https://www.cleverreach.com/de/datenschutz/>. The newsletter service provider is used based on our legitimate interests acc. Art. 6 (1) lit. f GDPR and a contract processing agreement acc. Art. 28 (3) sentence 1 GDPR.

The newsletter service provider may use the data of the recipients in pseudonymous form, i.e. without assignment to a user, to optimise or improve their own services, e.g. for the technical optimisation of sending and the presentation of newsletters or for statistical purposes. However, the shipping service provider does not use the data of our newsletter recipients to address them themselves or to pass the data on to third parties.

The newsletters contain a so-called "web beacon", i.e. a pixel-sized file that is retrieved from our server when opening the newsletter or from the server of the newsletter service provider. This request will collect technical information, such as information about the browser and your system, as well as your IP address and time of retrieval.

This information is used to improve the technical performance of services based on technical data or audience and their reading habits, based on their locations (which can be determined using the IP address) or access times. Statistical surveys also include determining if the newsletters are opened, when they will be opened, and which links will be clicked. For technical reasons, this information can be assigned to the individual newsletter recipients. However, it is neither our goal nor that of the newsletter service provider to observe individual users. The evaluations serve us much more to recognise 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.

A separate revocation of the performance measurement is unfortunately not possible, in this case, the entire newsletter subscription must be terminated.

## **22. Contact form and other forms of getting in touch with us**

When you contact us (for example, by contact form, email, telephone or via social media), we will process the contact request based on the received data in accordance with Art. 6 (1) lit. f GDPR. User information can be stored in a customer relationship management system ("CRM System") or comparable software.

We delete the requests if they are no longer required. We check the necessity every six months; furthermore, the legal archiving obligations apply.

## **23. Participation in affiliate programs**

Within our online offer, we rely on our legitimate interests (i.e., interest in the analysis, optimisation and economic operation of our online offering) acc. Art. 6 (1) lit. f GDPR industry-standard tracking measures, as far as these are necessary for the operation of the affiliate system. Below we give clarification about the technical background.

The services offered by our contractual partners can also be advertised and linked to other websites (so-called affiliate links or after-buy systems, if, for example, links or services of third parties are offered after conclusion of a contract). The operators of the respective websites receive a commission if users follow the affiliate links and then take advantage of the offers.

In summary, our online offering requires us to be able to keep track of whether users who are interested in products/services advertised in our online offering through affiliate links. For this, the affiliate links are supplemented by certain values that are part of the link or set otherwise, e.g. in a cookie. The values include in particular the source website (referrer), time, an online identifier of the operator of the website on which the affiliate link was located, an online identifier of the respective offer, an online identifier of the user, as well as tracking specific values such as ad ID, affiliate ID, and categorisations.

The user IDs used by us are pseudonymous values. The identifiers themselves do not contain personal data such as names or email addresses. They only help us determine whether the same user who clicked on an affiliate link or was interested in an offer through our online offer, has signed a contract with a contractual partner. However, the online identification is personal in so far as the partner company as well as we possess other user data in combination with it. Only then can the partner company tell us whether the user has taken advantage of the offer.

Among the affiliate systems we use are:

### Amazon affiliate program

On the basis of our legitimate interests (i.e. interest in the economic operation of our online offer within the meaning of Art. 6 (1) lit. f GDPR), we are participants in the Amazon EU

Affiliate Program, which was designed to provide a medium for websites by means of which the placement of advertisements and links to Amazon.de advertising fee refund can be earned (so-called affiliate system). As an Amazon partner, we earn on qualified purchases.

Amazon uses cookies to track the origin of orders. Among other things, Amazon may recognise that you have clicked the affiliate link on our site and subsequently purchased a product from Amazon.

For more information about Amazon's data usage and opt-out options, please read the company's privacy policy:

<https://www.amazon.com/gp/help/customer/display.html?nodeId=201909010>.

Note: Amazon and the Amazon logo are trademarks of Amazon.com, Inc. or one of its affiliates.

#### AWIN affiliate program (including former Affilinet affiliate program)

We are on the basis of our legitimate interests (i.e. interest in the economic operation of our online offer within the meaning of Art. 6 (1) lit. f GDPR) participants of the affiliate program of AWIN AG, Eichhornstraße 3, 10785 Berlin, Germany, to provide a medium was designed for websites that earn advertising costs by placing advertisements and links to AWIN (so-called affiliate system).

AWIN uses cookies in order to understand the origin of the contract. Among other things, AWIN can recognise that you have clicked on the partner link on this website and subsequently concluded a contract with or through AWIN.

For more information on AWIN's data usage and opt-out options, please see the Company's Privacy Policy: <https://www.awin.com/legal>.

#### financeAds affiliate program

We are based on our legitimate interests (ie interest in the economic operation of our online offer within the meaning of Art. 6 (1) lit. f GDPR) Participants of the affiliate program of financeAds GmbH & Co. KG, Karlstrasse 9, 90403 Nuremberg, Germany, the was designed to provide a medium for websites that can be used to earn advertising costs through the placement of advertisements and links to financeAds (so-called affiliate system).

financeAds uses cookies in order to understand the origin of the contract. Among other things, financeAds can recognise that you have clicked the partner link on this website and then made a contract with or through financeAds.

For more information on the use of data by financeAds and the possibility of objections, please refer to the company's privacy policy:

<https://www.financeads.net/aboutus/datenschutz/>.

## 24. Google Analytics

Based on our legitimate interests (i.e., interest in the analysis, optimisation, and economic operation of our online offer within the meaning of Art. 6 (1) lit. f GDPR), we use Google Analytics, a web analytics service provided by Google LLC ("Google"). Google uses cookies. The information generated by the cookies about the use of the online offer by the users are usually transmitted to a Google server in the USA and stored there.

Google is certified under the Privacy Shield Agreement, which provides a guarantee to comply with European privacy legislation

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

Google will use this information on our behalf to evaluate the use of our online offer by users, to compile reports on the activities within this online offer and to provide us with further services related to the use of this online offer and the internet usage. In this case, pseudonymous usage profiles of the users can be created from the processed data.

We only use Google Analytics with activated IP anonymisation. This means that the IP address of the users will be shortened by Google within member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be sent to a Google server in the US and shortened there.

The IP address submitted by the user's browser will not be merged with other data provided by Google. You can prevent the storage of cookies by setting your browser software accordingly; In addition, you may prevent the data collection by Google generated by downloading and installing the browser plug-in available under the following link:

<https://tools.google.com/dlpage/gaoptout?hl=de>.

For more information about Google's data usage, settings and withdrawal options, please read Google's privacy policy (<https://policies.google.com/technologies/ads>) and Google's ads settings options (<https://adssettings.google.com/authenticated>).

The personal data of users will be deleted or anonymised after 14 months.

## 25. Google AdWords and conversion tracking

We use the services of Google LLC, 1600 Amphitheater Parkway, Mountain View, CA 94043, USA, ("Google") on the basis of our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online service within the meaning of Art. 6 (1) lit. f DSGVO).

Google is certified under the Privacy Shield Agreement, which provides a guarantee to comply with European privacy legislation

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

We use Google's online AdWords marketing tool "AdWords" to place ads on the Google advertising network (e.g., in search results, in videos, on websites, etc.) so that they are displayed to users who have a suspected interest in the ads. This allows us to more specifically display ads for and within our online offering so that we only present ads to users

that potentially match their interests. "Remarketing" in this regard is targeted advertising of a product to a user in which he has previously shown an interest on a different website.

For this purpose, Google executes a code to set (re)marketing tags (invisible graphics or code also known as "web beacons" on our website or any other website that belongs to the Google Advertising Network.

With their help, the user is provided with an individual cookie, i.e. a small file is saved (instead of cookies, comparable technologies can also be used). In this file is noted which websites the user visited, in which content he is interested and what offers the user has clicked, as well as technical information about the browser and operating system, referring websites, visit time and other information on the use of the online offering.

Furthermore, we receive an individual "conversion cookie". The information obtained through the cookie is used by Google to generate conversion statistics for us. We only receive the anonymous total number of users who clicked on our ad and were redirected to a conversion tracking tag page. We do not receive any information that personally identifies users.

The data of the users are pseudonym processed within the Google advertising network. That means, Google does not store and process the name or email address of the users but links the cookie data to pseudonymous user profiles. From the perspective of Google, the ads are not managed and displayed to a specifically identified person, but to the cookie owner, regardless of who that cookie owner is. This does not apply if a user has explicitly allowed Google to process the data without this pseudonymisation. The information collected about users is transmitted to Google and stored on Google's servers in the United States.

For more information about Google's data usage, settings and withdrawal options, please read Google's privacy policy (<https://policies.google.com/technologies/ads>) and Google's ads settings options (<https://adssettings.google.com/authenticated>).

## **26. Google Optimize**

Scope of processing of personal data: We use functionalities of the web analysis and optimisation service Google Optimize from Google LLC, 1600 Amphitheater Parkway, CA 94043, Mountain View, Germany (and their representatives in Union Google LLC, Gordon House, Barrow Street, 4, Dublin , Ireland; hereinafter: Google).

Google Optimize is used to increase the attractiveness, functionality and content of websites by statistically evaluating changes in use.

Cookies from Google are saved on your device. This enables personal data to be saved and evaluated, especially the activity of the user (in particular which pages have been visited and which elements have been clicked on), device and browser information (in particular the IP address and the operating system), data about the advertisements displayed (in particular which advertisements were displayed and whether the user clicked on them) and also data from advertising partners (in particular pseudonymised user IDs). The information generated by the cookie about your use of this online presence is transmitted to a Google server in the USA and stored there. If IP anonymisation is activated on this online presence, your IP address will be shortened beforehand by Google within member states of the European Union or in other contracting states of the Agreement on the European Economic Area. The

full IP address is only transferred to a Google server in the USA and abbreviated there in exceptional cases. Google has submitted to the Privacy Shield Agreement between the European Union and the USA and has been certified. As a result, Google is committed to complying with the standards and regulations of European data protection law. You can find more information in the entry linked below:

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

Further information on the processing of data by Google can be found here:

<https://policies.google.com/privacy>

Purpose of data processing: The use of Google Optimize serves to increase the attractiveness of web content.

Legal basis for the processing of personal data: The legal basis for the data processing is Art. 6 Abs.1 S.1 lit. f GDPR. Our legitimate interest lies in the purposes of data processing mentioned above.

Duration of storage: Your personal information is stored for as long as it is necessary to fulfil the purposes described in this data protection declaration or as required by law. Advertising data in server logs are anonymised by Google deleting parts of the IP address and cookie information after 9 or 18 months.

Revocation and elimination options: You have the right to revoke your data protection declaration of consent at any time. Withdrawing your consent will affect the legality, which will not affect processing based on your consent prior to your withdrawal.

You can prevent the collection and processing of your personal data by Google by preventing the storage of third-party cookies on your computer, using the "Do-not-track" function of a supporting browser, the deactivation of the execution of script code in your browser or a script blocker such as NoScript (<https://noscript.net/>) or Ghostery (<https://www.ghostery.com>) in your browser.

With the following link you can deactivate the use of your personal data by Google:

<https://adssettings.google.com>

You can find more information about objection and elimination options against Google at:

<https://policies.google.com/privacy>

## **27. Online presence in social media**

We maintain an online presence within social networks and platforms in order to communicate with customers, prospects and active users as well as inform them about our services. When calling the respective networks and platforms, the terms and conditions and their data privacy guidelines apply.

Unless otherwise stated in our privacy policy, we process personal data of users that communicate with us within social networks and platforms, e.g. Write posts on our online presence or send us messages.

## 28. Integration of services and content of third parties

Based on our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online offer within the meaning of Art. 6 (1) lit. f. GDPR), we make use of content or services offered by third-party providers in order to provide their content and services to our users, such as include videos or fonts (collectively referred to as "content").

This always presupposes that the third-party providers of this content perceive the IP address of the users since they could not send the content to their browser without the IP address. The IP address is therefore required for the presentation of this content. We endeavour to use only content whose respective providers use the IP address solely for the delivery of the content. Third parties may also use so-called pixel tags (invisible graphics, also referred to as "web beacons") for statistical or marketing purposes. The "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 include, but is not limited to, technical information about the browser and operating system, referring web pages, visit time, and other information regarding the use of our online offering.

### YouTube

We embed YouTube videos offered by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

Privacy policy: <https://www.google.com/policies/privacy/>

Opt-out: <https://adssettings.google.com/authenticated>

### Google Fonts

We use "Google Fonts" offered by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

Privacy policy: <https://www.google.com/policies/privacy/>

Opt-out: <https://adssettings.google.com/authenticated>

### Twitter

Within our online offering, we incorporate features and content of the Twitter service offered by Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA.

This could be content such as images, videos, or text and buttons that users use to like or comment on content, subscribe to the content creators, or subscribe to our posts. If the users are members of the platform Twitter, Twitter can match activities to the profiles of the users there.

Twitter is certified under the Privacy Shield Agreement, which provides a guarantee to comply with European privacy legislation

(<https://www.privacyshield.gov/participant?id=a2zt0000000TORzAAO&status=Active>).



Privacy policy: <https://twitter.com/de/privacy>

Opt-out: <https://twitter.com/personalization>

### Outbrain

In some areas of our website, we use the technology of Outbrain UK Ltd, 5 New Bridge Street, London, EC4V 6JAUk. With the help of a so-called widget, users are informed of any further content that may also be of interest to you on our website and on websites of third parties. The content displayed in the Outbrain widget is automatically controlled and delivered by Outbrain in terms of content and technology.

The reading recommendations integrated mostly below an article are determined based on the previous content read by the user. Outbrain uses cookies stored on the user's device or browser to display this interest-based content. Outbrain collects the source of the device, the browser type, as well as the IP address of the user in which the last octet is deleted for anonymization. Outbrain awards a so-called Universally Unique Identifier (UUID), which can identify the user on a device-by-device basis when visiting a website that implements the Outbrain widget. Outbrain creates user profiles in which user interactions (e.g. page views and clicks) of a browser or device are aggregated to derive the preferences of the UUID.

The use of the services of Outbrain serves the purpose of preserving our legitimate interests, which prevail in the context of a weighing up of interests, for the optimal marketing of our website in accordance with Art. 6 (1) sentence 1 lit. f DSGVO.

You can object at any time to the tracking of interest-based referrals by Outbrain; do so, click on the "opt-out" box under Outbrain's privacy policy, available at <http://www.outbrain.com/legal/privacy>. Here you can also get more information about the privacy of Outbrain UK Ltd. The opt-out only applies to the device you are using and also loses its validity if you delete your cookies.

### LinkedIn Insight Tag

On our pages, the so-called Insight Tag of the social network LinkedIn is used. This is offered by LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA ("LinkedIn"). The LinkedIn Insight Tag is a small JavaScript snippet that we have added to our website.

The LinkedIn Insight Tag allows you to collect data about visits to our website, including URL, referrer URL, IP address, device and browser properties, timestamps, and page views. These data are encrypted, anonymized within seven days and the anonymized data is deleted within 90 days. LinkedIn does not share personal data with us, but only provides aggregated reports about the website's audience and display performance. LinkedIn also provides web site visitor retargeting so that we can use this data to display targeted ads outside our website without identifying the member. LinkedIn members can control the use of their personal data for advertising purposes in their account settings.

a) Purpose of data processing

The use of the LinkedIn Insight Tag is for the purpose of providing detailed campaign reports and information about the visitors of our website and thus our advertising and marketing interests. As a LinkedIn marketing solutions client, we use the LinkedIn Insight Tag to track conversions, retarget our website visitors, and gather additional information about the LinkedIn members who are watching our ads.

Details on data collection (purpose, extent, further processing, use) as well as your rights and setting options can be found in LinkedIn's privacy policy. These notes are available from LinkedIn at <https://www.linkedin.com/legal/privacy-policy>.

#### b) Legal basis of data processing

The legal basis for the processing of personal data is Article 6 (1) (f) DSGVO, which is a legitimate interest on our part. Our legitimate interest lies in the above-mentioned purposes.

#### c) Duration of storage

The data will be encrypted, anonymized within seven days and the anonymized data will be deleted within 90 days.

However, as a user, you can also decide at any time on the execution of the Java Script code required for the tool via your browser settings. By changing the settings in your Internet browser, you can disable or restrict the execution of Java Script and prevent it from being saved. Note: Disabling the execution of Java Script may make it impossible to fully use all features of the website.

#### d) Objection and removal option / opt-out

If you are a LinkedIn member and do not want LinkedIn to collect information about you from our website and associate it with your membership information stored on LinkedIn, you must log out of LinkedIn before visiting our website.

You can prevent the execution of the Java Script code required by the tool by setting your browser software accordingly.

To prevent the execution of Java Script code altogether, you can also use a Java Script Blocker, such as the browser plugin NoScript (for example, [www.noscript.net](http://www.noscript.net) or [www.ghostery.com](http://www.ghostery.com)).

### Facebook Pixels, Facebook Custom Audiences and Facebook Conversion

Within our online offer the so-called "Facebook Pixel" of the social network Facebook, which is operated by Facebook Inc., 1 Hacker Way, Menlo Park, CA 94025, USA, or if you are located in the EU, Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbor, Dublin 2, Ireland ("Facebook") is used.

With the help of the Facebook pixel, Facebook is able to designate you as a visitor to our online offer as a target group for the presentation of advertisements (so-called "Facebook ads"). Accordingly, we use the Facebook Pixel to display the Facebook ads only to those Facebook users who have also shown an interest in our online offering or certain features (e.g. interests in certain topics or products that have been visited by them), which we

transmit to Facebook (so-called "Custom Audiences"). With the help of the Facebook pixel, we also want to make sure that our Facebook ads are in line with the potential interest of users and are not annoying. With the help of the Facebook pixel, we can also understand the effectiveness of the Facebook ads for statistical and market research purposes, in which we see whether users were redirected to our website after clicking on a Facebook ad (so-called "conversion").

**Privacy Policy of Facebook:** The processing of the data by Facebook is within the scope of the data usage policy of Facebook. Accordingly, general notes on the presentation of Facebook ads, in the data usage policy of Facebook (<https://www.facebook.com/policy.php>). Special information and details about the Facebook pixel and how it works can be found in the Help section of Facebook (<https://www.facebook.com/business/help/651294705016616>).

**EU-US-Privacy Shield:** Facebook is certified under the Privacy Shield Agreement, providing a guarantee to comply with European privacy legislation (<https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>).

**Purpose:** The use of Facebook Pixel as well as the storage of "conversion cookies" is based on Art. 6 para. 1 lit. f DSGVO. We have a legitimate interest in analyzing user behavior in order to optimize both our web site and our advertising.

**Data processing contract:** For the processing of the data in which Facebook acts as a data processor, we have a data processing contract with Facebook, in which we commit Facebook to protect the data of our customers and not to pass them on to third parties.

**Objections:** While we have legitimate interests in using the Facebook Pixel and storing "conversion cookies", we offer opt-out options. You may object to the capture by the Facebook Pixel and use of your data to display Facebook ads. To set which types of ads you see within Facebook, you can go to the page set up by Facebook and follow the instructions for the usage-based advertising settings ([https://www.facebook.com/ads/preferences/?entry\\_product=ad\\_settings\\_screen#](https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen#) = ). The settings are platform independent which means that they are adopted for all devices, such as desktop computers or mobile devices. You may also object to the use of cookies for measuring audience activity and promotional purposes, via the opt-out page of the Network Advertising Initiative (<http://optout.networkadvertising.org/?c=1>), and additionally to the US website aboutads.info (<http://optout.aboutads.info/?c=2&lang=EN>) or the European website youronlinechoices.com (<http://www.youronlinechoices.com/uk/your-ad-choices>).

## 29. Share content via social media buttons

We do not use plugins from social networks on our website such as Facebook, Twitter, WhatsApp, LinkedIn and Xing. Our content sharing buttons are implemented via so-called deep links, which only pass on data to the respective network operators when you use them.

Only when you click on such a button, various data are transmitted to the respective social network. This may include: the date and time of the visit to the site, the URL of the site on which the visitor is located, the URL of the site the visitor previously visited, the browser used, the operating system used and the IP address of the visitor.

If you are logged in parallel to the respective social network (Facebook, Twitter, WhatsApp, LinkedIn or Xing) while visiting our page, it is not excluded that the provider assigns the visit to your network account. If you click on a social media button (for example, clicking the "Like" button, submit a comment), this information is also transmitted directly from your browser to the respective social network and stored there if necessary. The purpose and scope of the data collection and the further processing and use of the data by the networks can be found in the privacy policies of Facebook, Twitter, WhatsApp, LinkedIn and Xing.

### 30. Events and Webinars

#### Eventbrite

On our website, we offer the opportunity to register for certain justETF events. For this we use the technical solution Eventbrite, which is operated by Eventbrite, Inc., 155 5th Street, Floor 7, San Francisco, CA 94103, USA.

Eventbrite has representation for the purposes of European data protection legislation. This is Eventbrite NL BV, based in Silodam 402, 1013AW, Amsterdam, The Netherlands.

When you sign up for an event, you will be redirected to the Eventbrite website.

Eventbrite collects personal data if you voluntarily provide such information when registering for one of our events. Eventbrite then transmits this data to us as the organizer. To register for Eventbrite for an event, you must submit the following information to Eventbrite:

- Name, first Name
- E-mail address

Eventbrite participates in the EU-US Privacy Shield Framework Program of the US Department of Commerce and the European Commission for the collection, use and retention of personal data from the Member States of the European Economic Area.

Learn here what information Eventbrite collects, processes and uses in the EU US Privacy Shield Framework and for what purposes:

[https://www.eventbrite.co.uk/support/articles/en\\_US/Troubleshooting/eu-us-privacy-shield-notice?lq=en\\_GB](https://www.eventbrite.co.uk/support/articles/en_US/Troubleshooting/eu-us-privacy-shield-notice?lq=en_GB).

Furthermore, you will find information regarding the adherence to European data protection regulations by Eventbrite via the following link:

[https://www.eventbrite.co.uk/support/articles/en\\_US/Troubleshooting/data-processing-addendum-for-organizers?lq=en\\_GB](https://www.eventbrite.co.uk/support/articles/en_US/Troubleshooting/data-processing-addendum-for-organizers?lq=en_GB)

For more information on how Eventbrite uses personal data, please refer to the Eventbrite Privacy Policy:

[https://www.eventbrite.co.uk/support/articles/en\\_US/Troubleshooting/eventbrite-privacy-policy?lq=en\\_GB](https://www.eventbrite.co.uk/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy?lq=en_GB)

As an organizer Eventbrite gives us access to the above-mentioned data of the participants of the booked event. We use the data for the purpose of preparation and follow-up of the booked events. In addition, registered participants will receive information about the booked event and our contact details by e-mail before and after the booked event.

The processing of the data is based on Art. 6 para. 1 lit. b DSGVO (processing to fulfil a contract).

Users may receive information via e-mail after the event and may be contacted by us for the purposes of referring to similar events in the future. These processing operations are in accordance with Art. 6 para. 1 lit. b) GDPR justified. You have the possibility at any time to refuse the use of this data for advertising purposes for the future by revoking your request via the access data on the platform [www.eventbrite.de](http://www.eventbrite.de) over which you have booked.

### edudip

All webinars are processed via the service provider edudip GmbH, Jülicher Straße 306, 52070 Aachen, Germany, to which we provided information which you provided to us in the course of the webinar registration in accordance with Art. 6 para. 1 lit. b DSGVO i.V.m. Art. 28 DSGVO (conclusion of the contract processing contract). We use the data for the purpose of preparation and follow-up of the booked webinar. In addition, registered participants will receive information about the booked webinar and our contact details by e-mail before and after the booked webinar. The processed data includes base data, such as the name and e-mail address.

Users may receive information via e-mail after the event and may be contacted by us for the purposes of referring to similar webinars in the future. These processing operations are in accordance with Art. 6 para. 1 lit. b) GDPR justified. You have the possibility at any time to refuse the use of this data for advertising purposes for the future by revoking your request via the access data on the platform <https://www.edudip-next.com> over which you have booked.

For more information on how to deal with user data, please refer to Edudip's privacy policy at: <https://www.edudip-next.com/de/datenschutz>

We have a data processing contract with Edudip in which we commit Edudip to protect our customers' data and not share it with third parties.

### **31. Privacy policy in the application process**

We process the applicant data only for the purpose and in the context of the application process in accordance with the legal requirements. The processing of the applicant data takes place in order to fulfil our (pre)contractual obligations in the context of the application process within the meaning of Art. 6 (1) lit. b. GDPR Art. 6 (1) lit. f GDPR applies if the data processing e.g. is required for us in the context of legal proceedings (in Germany, Art. 26 BDSG applies additionally).

The application process requires applicants to provide us with the applicant data. The necessary applicant data are derived from the job descriptions and basically include the personal details, postal and contact addresses and the documents that belong to the application, such as cover letter, CV and certificates. In addition, applicants can voluntarily provide us with additional information.

By submitting the application to us, the applicants agree to the processing of their data for the purposes of the application process in accordance with nature and scope set forth in this privacy policy.

Insofar as special categories of personal data within the meaning of Art. 9 (1) GDPR are voluntarily communicated within the framework of the application procedure, their processing is additionally carried out in accordance with Art. 9 (2) lit. b GDPR (e.g., health information such as disability or ethnic origin). Insofar as special categories of personal data within the meaning of Art. 9 (1) GDPR are requested from applicants in the context of the application procedure, their processing is additionally carried out in accordance with Art. 9 (2) lit. a GDPR (for example health data, if necessary for the profession).

Applicants can send us their applications via email or by post. However, please note that emails are generally not sent in encrypted form and that applicants themselves must provide encryption. Therefore, we cannot take any responsibility for the transmission of the application between the sender and the reception on our server and therefore recommend to use the postal shipping.

The data provided by the applicants may be further processed by us in the event of a successful application for employment purposes. Otherwise, if the application for a job offer is not successful, the applicants' data will be deleted. Applicants' data will also be deleted if an application is withdrawn, which the applicants are entitled to at any time.

The deletion is subject to a legitimate revocation of the candidate, after the expiration of a period of six months, so that we can answer any follow-up questions to the application and meet our obligations under the Equal Treatment Act. Invoices for any reimbursement of travel expenses are archived in accordance with the tax regulations.

In the case of a legitimate revocation, the deletion takes place after the expiration of a period of six months, so that we can answer any follow-up questions to the application and fulfil our proof obligations under the Equal Treatment Act. Invoices for any reimbursement of travel expenses are archived in accordance with the tax regulations.

## **32. Disclosure of data**

Basically, a transfer of your personal data without your express prior consent only takes place in the following cases:

- 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.

The disclosure of this data is based on our legitimate interest in the fight against abuse, the prosecution of criminal offences and the protection, assertion and enforcement of claims and that your rights and interests in the protection of your personal data do not predominate, Art. 6 (1) lit. f GDPR.

- We rely on contracted external companies and external service providers ("contract processors") to provide our services. In such cases, personal data will be shared with these processors to allow them to be further processed. These processors are carefully

selected and regularly reviewed by us to ensure your privacy is maintained. The processors may only use the data for the purposes specified by us and, in addition, contractually oblige us to treat your data exclusively in accordance with this privacy policy and German data protection laws.

- As our business evolves, the structure of justETF GmbH 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.

Any disclosure of personal data is justified by the fact that we have a legitimate interest in adapting our corporate form as required by economic and legal circumstances and do not outweigh your rights and interests in the protection of your personal data, Art. 6 (1) lit. f GDPR.

### **33. Change of purpose**

Processing of your personal data for purposes other than those described will only take place if a legal provision allows this or if you have consented to the changed purpose of the data processing. In the event of further processing for purposes other than those for which the data was originally collected, we will inform you of these other purposes before further processing and provide you with all other relevant information.

### **34. Deletion of your data**

We will delete or anonymise your personal data as soon as it is no longer necessary for the purposes for which we collected or used it in accordance with the preceding paragraphs. As a rule, we store your personal data for the duration of the use or contractual relationship via the website.

When you delete your user account, your profile will be completely and permanently deleted.

After the expiration of these periods the data will be deleted, as far as these data are not needed longer because of legal storage periods, for the criminal prosecution or for the protection, assertion or enforcement of legal claims. In this case, they will be locked. The data is then no longer available for further use.

### **35. 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](http://www.justetf.com/dataprivacy).

**Last updated: 14th February 2020**