

Privacy Notice

1. Controller/ contact details

In the following, we inform you about the processing of your personal data carried out by justETF GmbH, Seitzstraße 8e, 80538 Munich, Germany (“justETF”, “we” or “controller”) in connection with your visit to our website and the use of our mobile application (the latter hereinafter referred to as “app”).

To exercise your rights and for further information, please contact us by e-mail at support@justetf.com or by post at justETF GmbH, Seitzstraße 8e, 80538 Munich.

You can reach our data protection officer at: privacy@justetf.com.

Further information about justETF can be found in the legal notice.

2. General information on the processing of personal data

2.1. General information

In principle, you decide which personal data you provide to us. Within the scope of the business relationship, you must provide such personal data as is necessary for the initiation, execution or termination of the business relationship and which we are obliged to collect and process on the basis of legal requirements. Without this data, we are not able to provide you with our services or functions.

2.2. Purposes and legal basis

We only process your personal data insofar as this is permissible in accordance with Art. 6 GDPR. Processing includes, for example, the collection, retrieval, use, storage or transmission of personal data. In the following, we describe the purposes and legal bases of the processing of personal data in detail.

2.2.1. Consent pursuant to Art. 6 (1) (a) GDPR

Processing on the basis of your consent in accordance with Art. 6 (1) (a) GDPR are carried out for defined purposes. You may withdraw your consent at any time with effect for the future. The withdrawal of consent does not invalidate the lawfulness of the processing carried out on the basis of the consent until revocation.

2.2.2. Fulfilment of contractual obligations or measures in the context of contract initiation pursuant to Art. 6 (1) (b) GDPR

We process personal data in accordance with Art. 6 (1)(b) GDPR in the context of contract initiation and fulfilment. This primarily includes processing that is directly related to the opening and provision of a profile with us. Further information on the scope and purposes of the respective processing can be found in the corresponding contractual documents.

2.2.3. Compliance with legal requirements pursuant to Art. 6 (1) (c) GDPR

Insofar as we are legally obliged to process data, we base this on Art. 6 (1) (1) (c) GDPR in conjunction with the respective statutory provision, in particular for the fulfilment of commercial and tax obligations for documentation and storage.

2.2.4. Legitimate interests pursuant to Art. 6 (1) (f) GDPR

Where necessary, we process your personal data in accordance with Art. 6 (1) (f) GDPR to protect our legitimate interests or those of third parties beyond the actual fulfilment of the contractual relationship. Processing is carried out for the following purposes, for example:

- Testing and optimisation of procedures for demand analysis and client segmentation,
- Performing direct marketing activities or market research on our products and services, to the extent permitted and provided you have not objected to the use of your data in this regard,
- Assertion and enforcement of legal claims and defence in legal disputes,
- Ensuring the IT security, IT operations and IT infrastructure of justETF,
- Prevention and investigation of criminal offences,
- Measures for business management and development of services and products,
- Ensuring the compliance and security of business processes,
- Providing personal analyses, evaluations and statistics.

3. Processing of your personal data when using our website and our apps

3.1. Hosting

For hosting the database and web content, we use Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, L-1855 Luxembourg, Luxembourg ("AWS"), a subsidiary of Amazon Web Services, Inc., P.O. Box 81226, Seattle, WA 98108-1226, USA, as a data processor. The data is stored exclusively in a German data centre in Frankfurt am Main, which meets the highest security standards. In addition, we have agreed corresponding EU standard contractual clauses with Amazon Web Services, Inc. in accordance with Commission Implementing Decision (EU) 2021/914 of 4 June 2021. You can view this Implementing Decision (EU) 2021/914, including the EU standard contractual clauses used, via the

following link: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32021D0914>.

In conjunction with additional technical and organisational measures to ensure an adequate level of protection, it is guaranteed that the EU data protection requirements can also be met when processing data in the USA.

3.2. Use of our website for information purposes

When you visit our website, we process access data that is stored in so-called log files. The following personal data is processed automatically in the course of this:

- IP address of the requesting device
- Type of web browser used
- Language of the web browser used
- Version of the web browser used
- Operating system and its version
- Date and time of the visit
- Time zone difference from Greenwich Mean Time (GMT)
- Access status/ http status code
- Amount of data transferred
- Web page visited
- Referrer
- Web pages that are called up by the visitor's system via our website
- Internet service provider of the user

The processing of this data is performed out in accordance with Art. 6 (1) (f) GDPR due to our legitimate interest in being able to properly display the website to you as well as to defend against attacks and for the purpose of the security of our systems. The log files are deleted or anonymised immediately after they are no longer required to achieve the aforementioned purposes, but at the latest after 14 days.

3.3. Content Delivery Network

In order to improve the loading times of our website and to protect it from misuse, we use functions of the content delivery network Contentful GmbH, Max-Urich-Straße 3, 13355 Berlin, Germany ("Contentful") as a data processor. When you visit our website, a connection to Contentful's servers is established, e.g. to retrieve content. This allows personal data to be stored and analysed in server log files, in particular the user's activity (in particular which pages have been visited) as well as device and browser information (in particular the IP address and operating system).

The use of Contentful's functions serves to deliver and accelerate online applications and content. This data is collected on the basis of our legitimate interest in presenting a technically error-free and optimised website in accordance with Art. 6 (1) (f) GDPR.

3.4. Use of cookies, tracking tools and third-party services on our websites and apps

3.4.1. General information

We use cookies and similar technologies, such as pixels, on our website. Cookies are small text files that are stored on your end device and process device-specific information. There are session-based and persistent cookies. While session-based cookies are deleted immediately at the end of a browser session, persistent cookies enable the settings you have selected to be saved for a longer period of time. Persistent cookies are used to provide you with the most pleasant user experience possible. We use our own code in our apps and also utilise software development kits (“SDKs”). An SDK is provided by our partners and contains code parts that execute certain functions.

The storage and reading (so-called “tracking”) of information, e.g. through the setting of cookies or the integration of SDKs on users' end devices, is only permitted on the basis of legal requirements with the express consent of the user (Section 25 (1) TDDDG in conjunction with Art. 6 (1) (a) GDPR). Insofar as the storage and processing is absolutely necessary for the performance of our services, no consent is required in accordance with Section 25 (2) TDDDG. The further processing takes place in each case according to Art. 6 (1) (f) GDPR for purposes that outweigh the protection of your data or are in your interest, such as fraud prevention, improving IT security and improving our digital services. If the processing of the following services is based on your consent, you can withdraw your consent at any time with effect for the future and manage and adjust this in the data protection settings. Below we describe the services that we integrate on our websites and apps that we consider necessary for the provision of our services.

For further general information on the cookies, tracking technologies and SDKs used, please refer to the cookie policy at the following link: <https://www.justetf.com/de/about/cookie-declaration.html>. You can also manage your consent and settings there.

3.4.2. Consent Management Service

On our website and in our apps, we use the Consent Management Service of Usercentrics GmbH, Sendlinger Straße 7, 80331 Munich, Germany (“Usercentrics”) to inform you about cookies, similar technologies and SDKs used by us and to ensure that these are only set or activated in accordance with applicable law and, if necessary, only with your consent. In connection with the collection of your consent, we process your IP address, opt-in and opt-out data, referrer URL, user agent, user preferences, consent ID, time of consent, consent type, template version and banner language. Your consent is stored in relation to a Usercentrics Consent ID. The use of Usercentrics is necessary so that we can comply with the legal requirements for the setting of cookies and in particular the applicable requirements for the documentation of consent. The data is processed on the basis of § 25 (2) no. 2 TDDDG in conjunction with Art. 6 (1) (c) GDPR.

Further information on data protection when using Usercentrics can be found here <https://usercentrics.com/privacy-policy/>.

3.4.3. Comfort settings (e.g. language settings)

In order to be able to display content such as your country and language settings as desired, we use session-based or persistent cookies. Your country settings will be deleted as soon as your browser session has ended. Your language settings are saved for a maximum of one year. The legal basis for the processing of these cookies is § 25 (2) TDDDG in conjunction with Art. 6 (1) (f) GDPR.

3.4.4. Friendly Captcha (Bot/ Spam Protection)

We use the “Friendly Captcha” service provided by Friendly Captcha GmbH, Am Anger 3-5, 82237 Wörthsee, Germany, to prevent the use of our website and apps by automated programmes and scripts (so-called “bots”). For this purpose, a program code from Friendly Captcha has been integrated in order to pose a calculation task to the respective device of the visitor. Depending on the result of the calculation task, the corresponding enquiry is processed or rejected, e.g. when registering a customer profile, sending the contact form or subscribing to the newsletter. Friendly Captcha does not set or read any cookies on the visitor’s end device. Collected IP addresses are processed in hashed (one-way encrypted) form.

This data is processed in accordance with Section 25 (2) TDDDG in conjunction with Art. 6 (1) (f) GDPR to ensure the security and reliability of the website and apps and to protect them from abusive access by bots, i.e. spam protection and attacks (e.g. through mass requests). If personal data is stored, this data is deleted within 30 days.

Further information on data protection when using Friendly Captcha can be found at <https://friendlycaptcha.com/legal/privacy-end-users/>.

3.4.5. Push Notifications/ messages

We use push notifications to inform you, for example, when price alerts are reached. For this purpose, a device token from Apple or a registration ID from Google is assigned. These are encrypted, anonymised device IDs. The sole purpose of their use is to provide push services. For this purpose, we use the Firebase Cloud Messaging Service from Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. This data is processed in accordance with Section 25 (2) TDDDG in conjunction with Art. 6 (1) (f) GDPR in order to be able to display informative push notifications on your device. You can activate and deactivate this function at any time in your device settings.

3.4.6. Phrase

Using “Phrase”, provided by Phrase GmbH, ABC-Straße 4, 20354 Hamburg, Germany, we can automatically update notices and information texts in our apps in real time. The updates are transferred to the apps without the need to update to a new app version. In this context, we process device identification data and the version of the installed app. This data is processed in accordance with Section 25 (2) TDDDGD in conjunction with Art. 6 (1) (f) GDPR to ensure that the information and information texts in disclaimers, FAQs or information boxes are correct and up-to-date.

3.4.7. Affiliate programmes

As an affiliate partner, we cooperate with various affiliate programmes and have integrated affiliate or referral links to the products or services of our partner companies on our website. When you click on one of these links, cookies are set to track the forwarding to our partner companies. In this process, our partner ID is transmitted to the provider of the respective affiliate programme. Please note that none of your personal data will be passed on.

Our website uses functions of the following affiliate programmes:

- AWIN AG, Otto-Ostrowski-Straße 1A, 10249 Berlin, Germany,
- Amazon EU S.à.r.l, 38, avenue John F. Kennedy, L-1855 Luxemburg,
- financeAds GmbH & Co. KG, Karlstraße 9, 90403 Nürnberg, Deutschland,
- financeAds International GmbH, Hardenbergstr. 32, 10623 Berlin Germany
- Impact Tech, Inc., 223 E. De La Guerra Street, Santa Barbara, CA 93101, USA,
- netzeffekt GmbH, postal address, Agnes-Bernauer-Straße 90, 80687 Munich, Germany,
- Parqet Fintech GmbH, Meißnerstraße 36, 20259 Hamburg, Deutschland,
- Scalable GmbH, Seitzstraße 8e, 80538 Munich, Germany and
- Trade Republic GmbH, Brunnenstr. 19-21, 10119 Berlin Germany

This data is processed in accordance with Section 25 (2) TDDDGD in conjunction with Art. 6 (1) (f) GDPR in order to be remunerated by the cooperating affiliate programmes.

4. Provision of our services

4.1. Registration/ Creation of customer profile

To make use of our services, you can register with us and create a customer profile. For this purpose, we collect your salutation, first and last name and your email address. As part of the registration process, you will also set a password for your personal access. The aforementioned processing is carried out in order to fulfil our legal and contractual obligations in accordance with Art. 6 (1) (b) GDPR. For the purpose of providing your customer profile, we use AWS as a commissioned data processor.

4.2. Data processing for payment purposes

In order to fulfil the contract with you with the selected payment method, we use Stripe Payments Europe, Limited (SPEL), 1 Grand Canal Street Lower, Grand Canal Dock, Dublin, D02 H210, Ireland (“Stripe”) for the purposes of payment processing and invoicing. As part of the payment process, details of the payment method, account information and other personal data such as your first and last name, billing address and email address are transmitted to Stripe. Stripe processes your personal data under its own responsibility for the specific purpose of payment processing. Further information on data processing by Stripe can be found at <https://stripe.com/privacy>. Stripe processes your personal data such as your first and last name, billing address and email address as a data processor in the context of invoicing. The legal basis for the processing is Art. 6 (1) (b) GDPR in order to fulfil the payment in the context of a contract with you, and otherwise Art. 6 (1) (f) GDPR, as part of our legitimate interest in being able to offer you appropriate payment options with Stripe. Since the processing of your personal data by Stripe in a so-called third country or outside the EU cannot be ruled out, we have agreed corresponding EU standard contractual clauses with Stripe. You can view the EU standard contractual clauses used via the following link:

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32021D0914>.

4.3. Compilation of statistics and analyses

We process personal data that we collect as part of the contract initiation or contractual relationship with you, as well as usage data of our products and services, on the basis of our legitimate interest in accordance with Art. 6 (1) (f) GDPR, to provide you with personal analyses, evaluations and statistics (e.g. the year-end recap) and for the purpose of analysing our current client base.

We also process this data to create anonymous statistical data sets. This processing is based on our legitimate interest pursuant to Art. 6 (1) (f) GDPR to create forecasts and reports and to evaluate and optimise our performance and product quality. These anonymised data set do not constitute personal data.

5. Marketing communication and activities

5.1. Newsletter

You can subscribe to our newsletter on our website. In the course of your registration, you agree that we may send you personalised marketing content from us and our partners and that we may contact you to conduct customer surveys to improve our products and services. In addition, we have implemented pixels in our newsletter to better understand your interaction with our newsletter and our content. The processing is based on your consent (Art. 6 (1) (a) GDPR). You may withdraw your consent at any time with effect for the future. To do this, simply click on “Unsubscribe” at the end of a marketing e-mail or contact us using the contact options mentioned above. The withdrawal of consent does

not invalidate the lawfulness of the processing carried out on the basis of the consent until revocation. To ensure that no one can register with a third-party email address, we have implemented the so-called double opt-in procedure. This means that you will receive an email after registration asking you to confirm your registration. The confirmation of the subscription to the newsletter is logged in order to be able to prove the subscription process in accordance with the legal requirements. For this purpose, we process the IP address, date and time of access in accordance with Art. 6 (1) (f) GDPR. As the service provider for sending our emails, we use CleverReach GmbH & Co. KG, Mühlenstraße 43, 26180 Rastede, Germany as the data processor of our emails.

5.2. Marketing push notifications

To provide you with marketing content from us and our associated partners according to your personal interests via push notifications, we ask you for your consent when you open your account in accordance with Art. 6 (1) (a) GDPR). Your data is only processed for the purpose of sending push notifications once you have completed the registration process, logged in to the app and activated the "System Opt-In" for push notifications on the device. Your consent to receive marketing push notifications is managed on a device-by-device basis, with consent being set individually on each device. You can activate or deactivate this function at any time in your device settings. The withdrawal of consent does not invalidate the lawfulness of the processing carried out on the basis of the consent until revocation. Your consent to receive marketing push notifications is logged in order to be able to prove this accordingly. For this purpose, we process the device ID, date and time of registration of the device in accordance with Art. 6 (1) (f) GDPR.

5.3. Marketing campaigns

If you take part in one of our marketing campaigns or competitions (the respective terms and conditions apply), we process your personal data, such as first and last name, email address or user ID, to carry out the marketing campaign or competition, in particular to notify you of the prize in accordance with Art. 6 (1) (b) GDPR. Depending on the respective promotion or sweepstakes, we additionally process the data listed in the corresponding terms and conditions of the campaign. We delete personal data as soon as the campaign or competition has ended and the data is no longer required for the fulfilment of the aforementioned purposes and provided there is no other legal basis (e.g. retention periods under commercial and tax law).

6. Contact form/ customer service

You can contact us by post, via our web form or by email and send us an enquiry. In this context, we process the information and data you provide, including personal data such as your first name, surname, email address and telephone number and, if applicable, the time of your enquiry and the duration of your call in a ticket, in order to contact you and

process your enquiry. The processing is carried out to fulfil our contractual obligations or in the context of contract initiation and execution in accordance with Art. 6 (1) (b) GDPR. Furthermore, we process the information in accordance with Art. 6 (1) (f) GDPR in order to continuously improve our customer service and support. We use Zendesk GmbH c/o TaylorWessing, Neue Schönhauser Str. 3-5, 10178 Berlin, Germany as a processor to process and respond to your enquiries. Since processing in the USA cannot be ruled out, we have agreed corresponding EU standard contractual clauses in accordance with Commission Implementing Decision (EU) 2021/914 of 4 June 2021 with Zendesk, Inc, 181 S. Fremont St., San Francisco, CA 94105 with registered office in the USA. You can view this Implementing Decision (EU) 2021/914, including the EU standard contractual clauses used, via the following link: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32021D0914>.

7. Your application to justETF

You can apply to us via our job portal at <https://careers.smartrecruiters.com/ScalableGmbH?search=justetf>. The purpose of data collection is to carry out the application procedure in order to possibly establish an employment relationship. In order to process your application, we collect the data provided by you in accordance with Art. 6 (1) (b) and Art. 88 (1) GDPR in conjunction with § Section 26 (1) BDSG. Please note that we use Scalable GmbH, Seitzstraße 8e, 80538 Munich, Germany as a data processor for the provision of the application portal used as part of the application process. Further information on the processing of your personal data can also be found in Scalable GmbH's data protection information for applicants.

If the application does not result in an employment relationship, this data will be deleted six months after completion of the application process. The legal basis for the six-month storage period results from Art. 17 (3) (e) GDPR in conjunction with § Section 15 (4) AGG (General Equal Treatment Act). Applicants have the right to take legal action under the AGG. We are authorised to store the data as long as we have to reckon with a complaint.

8. Social Media

We do not use any social media plugins on our website. If our website contains icons from social media providers (e.g. Facebook, X (formerly Twitter), LinkedIn, Instagram, YouTube), we only use these for passive linking to the pages of the respective providers. Further information can be found in our data protection information on our social media presences.

9. General retention periods

Your personal data will be stored and processed for the duration of the business relationship. We delete or anonymise your data after the business relationship with you has been fully terminated and processed, but at the earliest after expiry of the statutory,

regulatory and/or other sovereign retention periods and if the data is no longer required for the assertion, exercise and/or defence of legal claims.

We are subject to various statutory recording and retention obligations, which arise primarily from the German Commercial Code (HGB) and the German Fiscal Code (AO). These statutory recording and retention obligations oblige us to store data for between six (6) years and ten (10) years. These obligations also apply to processes that enable the initiation of a contractual relationship or the conclusion of a contract. The processing and storage of the data is carried out to fulfil statutory retention obligations in accordance with Art. 6 (1) (c) GDPR.

In addition, the retention periods under civil law are also relevant to determine the duration of the data retention. According to the provisions of the German Civil Code (BGB), these limitation periods can be up to 30 years, whereby the regular limitation period is three years. The respective legal basis for this is Art. 6 (1) (f) GDPR, as we have a legitimate interest in the preservation of evidence to secure our own legal claims.

10. Recipients or categories of recipients of personal data

We only transfer personal data to recipients in third countries if an adequate level of data protection can be established and maintained by means of the following mechanisms:

- The European Commission has confirmed that the third country has an adequate level of protection. An overview of the third countries with an adequacy decision by the European Commission can be found at: https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en.
- Corresponding EU standard contractual clauses have been concluded in accordance with Commission Implementing Decision (EU) 2021/914 of 4 June 2021 for the transfer of personal data as an adequate guarantee for data processing in non-European countries. You can view this Implementing Decision (EU) 2021/914, including the EU standard contractual clauses used, via the following link: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32021D0914>.
- Approved binding internal data protection regulations (“Binding Corporate Rules”) are in place
- You have given your consent to the transfer of data.

We will inform you separately about the details, if required by law.

11. Recipients or categories of recipients of personal data

In order to offer you our products and services, your personal data is made available to internal departments that require your data to fulfil our contractual and legal obligations. We also transmit certain data to other companies affiliated with justETF in the Group, in particular Scalable GmbH, Seitzstraße 8e, 80538 Munich. External third parties, such as

data processors and independent controllers, may also receive data for these purposes, provided that they maintain banking secrecy and undertake to comply with our written instructions under data protection law. Insofar as third parties receive and process personal data on our behalf, we have concluded an data processing agreements with the respective parties and agreed appropriate guarantees to safeguard the protection of personal data. These recipients include companies and service providers to whom we outsource parts of our financial services, such as IT services (e.g. IT security, cloud service providers), text analysis services (including artificial intelligence), customer service outsourcing service providers, printing and shipping services.

12. Your rights

Right to access: Pursuant to Art. 15 GDPR, you have the possibility to request information about the data stored about you, its origin, recipients or categories of recipients to whom the data is disclosed, as well as the purpose of the storage (Art. 15 GDPR).

Right to rectification: You have a right to rectification and/or completion vis-à-vis the controller if the personal data processed concerning you are inaccurate or incomplete (Art. 16 GDPR).

Right to deletion: You can demand that we delete the personal data relating to you without delay. However, there is no right to erasure if statutory, regulatory or other sovereign retention obligations prevent erasure or if the retention serves the assertion, exercise or defence of legal claims (Art. 17 GDPR).

Right to restriction of processing: You may, under certain conditions (disputed accuracy, unlawful processing, cessation of the purpose of processing or lodging an objection), request the restriction of the processing of personal data concerning you (Art. 18 GDPR).

Right to data transfer: You have the right to receive the personal data concerning you that you have provided to us in a structured, common and machine-readable format. (Art. 20 GDPR).

Right to object: You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you which is processed on the basis of Art. 6 (1) (e) or (f) GDPR are processed, to file an objection. We will then no longer process your data unless there are compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or the processing is for the establishment, exercise or defence of legal claims (Art. 21 GDPR).

Right to complain to the supervisory authority: Pursuant to Art. 77 GDPR, you have the right to complain to a supervisory authority if you are of the opinion that the processing of personal data is not carried out lawfully. The address of the supervisory authority responsible for our company is: Bayerisches Landesamt für Datenschutzaufsicht (BayLDA), Postfach 1349, 91504 Ansbach, Germany, phone: +49 (0) 981 180093-0, email: poststelle@lda.bayern.de.

Version: 03/2025