

1 General Data Protection Notice

We understand how important it is to you that your personal information is handled carefully, which is why we appreciate your confidence that Baader & Heins Capital Management AG will handle this information confidentially. Through this declaration you are granting your consent to allow Baader & Heins Capital Management AG to collect, process and use the personal data specified below in a manner that accords with the General Data Protection Regulation (GDPR) for the purposes specified herein. You can withdraw your consent with future effect at any time.

Please note that the Baader & Heins Capital Management AG website contains links to websites of other providers to which this data protection notice does not apply.

The collection and processing of personal data from customer information that we obtain from you helps us continuously improve and customise the services we provide. When you visit our website we collect the following information: your internet protocol address (IP), which connects your computer to the internet, confirmation that emails have been received and read, log-ins, email addresses, passwords, information about your computer and internet connection, such as type and version of browser, operating system and platform as well as the complete Uniform Resource Locators (URL) clickstream to, through and from our website, i.e. the sequence of pages you visited on our website, including date and time, cookie number and the products you viewed or searched for. Your user profile is only stored in anonymised form. All other disclosure of personal and business data is provided on a voluntary basis when you contact us or make use of our mailing or ordering services.

Use and dissemination of customer personal data; purpose limitation

We handle all data confidentially, whether saved automatically or provided by you. Data collected automatically and any email addresses you provide are passed on solely to our provider for the purpose of storing and distributing emails. It is not forwarded or sold to third parties. We use your personal data solely for the purpose of responding to your queries, delivering the services you request or for internal statistical purposes.

The transfer of personal data to government institutions and public authorities does not occur automatically, but only within the scope of applicable financial law (Stock Exchange Act, Securities Trading Act). Internal and external employees of Baader & Heins Capital Management AG as well as those of the provider are obligated to keep data confidential.

Notices

If you have any questions regarding data protection at Baader & Heins Capital Management AG, please send us an email – being as precise as possible – to datenschutz@baaderbank.de. Our in-house data protection officer will address your query.

Security at www.baaderheins.de

Baader & Heins Capital Management AG employs appropriate technical and organisational security measures to protect your data against accidental or intentional manipulation, loss, destruction or access by unauthorised persons. These security measures are continuously upgraded in accordance with technical advancements.

2 Controller

Names and contact details of the responsible entity:

Baader & Heins Capital Management AG
Weihenstephaner Straße 4
85716 Unterschleißheim
Deutschland

Members of the Management Board:
Andree Heins, Markus Britzl

T +49 89 23 18 00 0

F +49 89 23 18 00 10

E-Mail kontakt@baaderheins.de

3 Contact details for the Data Protection Officer

Baader & Heins Capital Management AG
Weihenstephaner Straße 4
85716 Unterschleißheim
Germany

T +49 89 23 18 00 0

F +49 89 23 18 00 10

E-Mail datenschutz@baaderheins.de

4 Legal Bases, Purpose of Processing and Source of Personal Data

We process personal data in accordance with the legal bases and for the purposes permitted under the General Data Protection Regulation (examples, by no means exhaustive).

- **Article 6(1)(a) - on the basis of your consent:** Processing occurs for specific purposes, such as for subscriptions to newsletters or participation in the Baader Investment Conference, if you have granted us your consent to do so. This consent can be revoked at any time and without stating cause. However, consent remains valid until revoked.
- **Article 6(1)(b) - in performance of a contract or pre-contractual measures:** Processing of personal data occurs, for example, when opening an account or investment account, concluding an employment contract, in applying for a position or other contractual or pre-contractual measures.
- **Article 6(1)(c) - on the basis of statutory provisions:** Processing can occur as a result of legal obligations placed on the bank by law or regulatory requirements with which we are obliged to comply. These may be due to, for example, the Tax Code, directives from relevant supervisory authorities, tax offices or law enforcement agencies, the Money Laundering Act, the Banking Act, the Securities Trading Act, etc.

- **Article 6(1)(f) - on the basis of legitimate interests:** Legitimate interests in processing data exist, for example, as regards to credit agencies to determine credit worthiness and default risks, archiving and storage of documents beyond statutory retention periods, where required for asserting or defending legal claims or for video monitoring to ensure compliance with building rules and to preserve evidence of crimes.

We primarily process data that you provide to us. In fulfilling our legal and contractual obligations, it may also be necessary for us to draw on external sources of information. Generally, this involves credit agencies and public registries such as commercial registries, transparency registries, Federal Gazette, Creditreform and other entities. This data serves primarily to clearly identify the affected party and, where applicable, to establish a beneficiary or to check creditworthiness.

5 Recipients of personal data

Internal recipients

Our technical and organisational measures ensure that your data can only be accessed by those employees who need it to fulfil their duties or our legal and contractual obligations.

External recipients

Personal data is transferred to external recipients only where required in fulfilment of statutory or contractual obligations. Examples of transfer to external recipients may include:

- External service providers whose services we use and which receive or gain knowledge of personal data for this purpose. In such instance, a special processor agreement is concluded with each provider in accordance with the requirements of the General Data Protection Regulation and the Federal Data Protection Act. This agreement governs and periodically monitors all data protection obligations. Of particular note in this context is the processor's duty to maintain bank or data secrecy. Examples in this regard may include system maintenance performed by external specialists (system updates or troubleshooting measures) or the mailing of bank statements.
- Reporting requirements for public entities, agencies or authorities
- Other banks, financial institutions or investment companies

6 Transfer to third countries/international organisations

We only transfer personal data to countries outside the EU, the EEA or to countries not certified by the EU as having appropriate levels of data protection or to international organisations if this is necessary to fulfil customer orders or if required by law or if you have directed us to do so in writing. Where processors are used in such countries, they are obligated to have an EU-equivalent level of data protection via inclusion of a standard EU clause.

7 Data retention period

In principle, personal data is processed and stored for as long as a contractual business relationship exists. Following termination of such relationship, the data is stored for at least as long as is required under statutory retention periods. However, the data may be retained for longer periods if required as evidence in court, for example.

8 Rights of the affected person

Each affected person has the right

- to obtain information (Article 15 GDPR) from the controller on personal information about themselves and
- to correct it (Article 16 GDPR) or delete it (Article 17 GDPR) or restrict its processing (Article 18 GDPR)
- to data transferability (Article 20 GDPR)
- to object to processing (Article 21 GDPR)
- (where applicable) to withdraw consent at any time without this affecting the lawfulness of the processing that occurred on the basis of consent prior to withdrawal (Article 7 GDPR)
- to lodge a complaint with a supervisory authority (Article 77 GDPR). For Baader & Heins Capital Management AG the relevant supervisory authority is the Bayerische Landesamt für Datenschutzaufsicht (Bavarian State Office for Data Protection Monitoring).

The complaint may be filed in writing, verbally or online by contacting the following: Bavarian Data Protection Authority (BayLDA), Promenade 27, 91522 Ansbach, T +49 981 53 1300, F +49 981 53 98 1300, poststelle@lda.bayern.de, www.lda.bayern.de

9 Need to provide data and consequences of failure to do so

You are not required to provide us with your personal data. Failure to provide this data, however, can and may result in a desired contractual business relationship not being formed. In principle, we collect only the data needed to fulfil contractual or statutory obligations and thereby fulfil the data minimisation requirement under the GDPR. If you provide your contact details by means of a business card, for example, we store this data, where applicable, on a contact management system. This data is then used solely for us to contact you to provide customer support.

10 No automated decision-making, including profiling

We do not use either scoring or profiling systems for automated decision-making and the data is only used for the purpose for which it was collected.