

## 1 Introduction

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If you purchase our euro-denominated stablecoins (“**EURAU**”) directly from AllUnity GmbH (“**Buying Process**”) or exchange them back into euros through AllUnity GmbH (“**Redemption Process**”), we must collect certain personal data from you in order to fulfill our legal obligations and to execute our contract with you. We would like to inform you about the nature, scope and purposes of this processing. The data processing information provided below is based on the provisions of Art. 13 (1) and (2) of the General Data Protection Regulation (GDPR).

## 2 Name and contact information of the data controller

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The data controller within the meaning of the GDPR is:

### **AllUnity GmbH**

Sandweg 94 (Building C)  
60316 Frankfurt am Main

tel.: +49 (0) 69 944 123 59

e-mail: [support@allunity.com](mailto:support@allunity.com)

(hereinafter referred to as „**AllUnity**“, „**we**“ or „**us**“)

## 3 Name and contact information of the Data Protection Officer (DPO)

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You can contact our external Data Protection Officer (DPO) as follows:

### **Sven Lindenlauf**

eyeDsec Information Security GmbH

e-mail: [dataprivacy@allunity.com](mailto:dataprivacy@allunity.com)

## 4 Types of personal data

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In the course of the Buying or Redemption Process, we process the following personal data of you or your employees whom you name to us as a contact person as well as potentially relevant third parties:

- Personal master data (*e. g. first and last name, address, nationality/citizenship, position/function at the customer's company, information about beneficiaries of the customer's company, etc.*)
- Professional contact data (*e. g. professional e-mail-address, professional telephone number, etc.*)
- Position at the firm
- Correspondence and communication data (*e. g. e-mail histories, call logs, etc.*)
- Contract data (*contract content, contact persons, signatures, etc.*)

- Transaction and bank data (*e. g. amount, date, recipient, sender, etc.*)
- Information relevant to money laundering law (*identification documents, proof of origin of funds, PeP check, customer profile, etc.*)
- Approval documents from the management, if applicable
- Sales-relevant data (*e. g. background information, meeting notes, etc.*)
- Other personal data provided in the course of the business relationship, if applicable

Irrespective of this, there may always be constellations in which we process personal data from you that is not mentioned here. In these cases, we will then provide you with separate data processing information relating to the respective occasion.

## 5 Purpose and legal basis of the data processing

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We process your data in particular for the preparation or implementation of a business relationship. The legal basis for this processing of your personal data is **Art. 6 (1) lit. b) GDPR**. According to this, the processing of data is permitted if this is necessary for the preparation, establishment, execution or termination of a contractual relationship.

In addition, we process your data if this is necessary to protect our legitimate interests, unless your interests that require the protection of personal data outweigh this. The legal basis for this processing is **Art. 6 (1) lit. f) GDPR**. Our legitimate interest lies in particular in the storage of your personal data as part of our Customer Relationship Management (CRM). For further information on this, you can contact us or our DPO using the contact details provided above.

Furthermore, we are subject to various legal obligations, i. e. legal requirements (*e. g. from tax law, commercial law or financial services law*), which we must comply with. The processing of your data for these purposes is based on **Art. 6 (1) lit. c) GDPR**. The personal data affected by this includes, in particular, any identification and verification data for the fulfillment of due diligence obligations in accordance with money laundering law. In addition to that, this also includes statutory retention obligations for data relevant to the prevention of money laundering (§ 8 Money Laundering Act (GwG)) as well as tax or payment-related data arising from tax law (in particular § 147 of the German Fiscal Code (AO)) and commercial law (§ 257 of the German Commercial Code (HGB)). This also includes any business-related correspondence (commercial and business letters) with you. Further information on the specific retention period of this personal data can be found in section 6 of this document.

If you have given us your express consent for certain purposes, the processing of your personal data for such purposes is based on **Art. 6 (1) lit. a) GDPR**. In this case, the specific purposes result directly from the corresponding declaration of consent. In this case, you have the right to revoke your consent at any time without giving reasons with effect for the future. However, the data processing carried out on the basis of the consent until the revocation remains unaffected by the revocation.

## 6 Duration of data retention

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In principle, we only store your personal data for as long as is necessary to achieve the purposes pursued by us (see section 5). As a rule, this corresponds to the duration of the business relationship and (in addition) the duration of any limitation periods (regularly 3 years in accordance with § 195 of the German Civil Code (BGB)), provided there are no longer retention obligations.

If you give us your explicit consent for further storage of personal data, the data may also be stored for a longer period of time, provided that you do not revoke your consent before this period expires.

Insofar as statutory retention obligations exist, these must be taken into account by us. Statutory retention obligations arise in particular from the German Commercial Code (HGB), the German Fiscal Code (AO) and the German Money Laundering Act (GwG). The retention periods specified there are between 5 and 10 years and apply, among other things, to data for the identification of customers and business partners for the purpose of the prevention of money laundering and terrorist financing in accordance with the due diligence obligations under the GwG as well as tax and payment-related data and operational communication (business and commercial letters).

Insofar as there are no statutory retention obligations, personal data will be deleted if its further processing is no longer required for the above-mentioned purposes. However, in the event of a possible legal dispute, your personal data may also be processed for longer for the purpose of asserting or defending legal claims, provided that your data is required for this purpose.

In addition, other deviating retention and deletion periods may also apply. In these cases, you will be informed separately.

## 7 Recipients of your personal data

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In order to conduct the business relationship, the following internal and external bodies will also have access to or insight into your personal data. Data will only be transferred within AllUnity GmbH and to external bodies and service providers if this is necessary to fulfill the above-mentioned purposes or to protect our legitimate interests.

### Internal recipients:

- Management (*due diligence obligations*)
- IT department (*customer onboarding*)
- Sales & marketing (*distribution, identification, verification*)
- Compliance department (*identification check*)
- Accounting (*transaction management*)
- Legal department (*contract management*)
- Office management (*document management/archiving*)

### External recipients:

- Public bodies and institutions (e.g. Deutsche Bundesbank, Federal Financial Supervisory Authority, European Banking Authority, tax authorities, criminal prosecution authorities) in the event of a legal or official obligation
- Other credit and financial services institutions or comparable institutions to which we transfer personal data in order to conduct the business relationship with you

- IT providers (e. g. AML tools, transaction monitoring tool, etc.)
- Supervisory authorities (e. g. BaFin)
- Other service providers (if necessary)

We have concluded corresponding Data Processing Agreements (DPA's) with all service providers that process personal data on our behalf (so-called "**Processors**") in accordance with Art. 28 GDPR.

Data is not regularly transferred to a country outside the European Union or the European Economic Area (so-called "**Third Countries**"). Should your personal data nevertheless be transferred to a Third Country in individual cases, we will implement appropriate safeguards to ensure an adequate level of protection for your data.

## 8 Data processing locations

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Your personal data will only be processed on dedicated IT systems of AllUnity or in the certified data centers of our IT service providers within the EU/EEA.

Should your personal data nevertheless be transferred to a Third Country in individual cases, we will implement appropriate safeguards to ensure an adequate level of protection for your data.

## 9 Rights of the data subject

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In accordance with Art. 15 GDPR, you have the right to receive **information** about the personal data stored about you. You also have the right to receive a copy of your personal data processed by us and, in the event of a data transfer to a third country, the right to be informed of the appropriate safeguards implemented by us to ensure data security.

If we process incorrect personal data about you, you have the right to have this data **corrected** in accordance with Art. 16 GDPR. In addition, you have the right to have incomplete personal data **completed** by us. If the legal requirements are met, you can also request the **deletion** (Art. 17 GDPR) or **restriction** (Art. 18 GDPR) of the processing of your personal data.

In accordance with Art. 20 GDPR, you can assert the right to **data portability** for data that is processed automatically on the basis of your consent or a contract with us. In this case, we are obliged to hand over the personal data concerned in a structured, commonly used and machine-readable format.

**In the case of data processing that we carry out on the basis of a legitimate interest, you have the right to object to the data processing** (Art. 21 GDPR). In this case, we may no longer process the data concerned unless there are compelling legitimate grounds for further processing that outweigh your interests.

If you have given your consent to the processing of personal data, you can **revoke your consent** at any time and without giving reasons with effect for the future. Any data processing that has already taken place up to that point on the basis of this consent remains unaffected by the revocation.

You can assert these rights against us using the contact details given above.

However, you also have the right to **complain** about the processing of personal data by us directly to a data protection supervisory authority of your choice.

### 10 Further information

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Generally, there is no (legal) obligation to provide your personal data. However, you must provide the personal data that is required to enter into or carry out the corresponding contractual agreement, to redeem your EURAU or that we are legally obliged to collect. If you do not provide this data, we may not be able to execute a business relationship with you.

Automated decision-making based on your processed personal data (including profiling) does not take place.

**Status:** July 2025