

Data protection policy for the AllUnity Minting Platform

1 Introduction

At this point, we would like to inform you about the processing of your personal data in connection with your visit to the AllUnity Minting Platform (the “platform”). The protection of your privacy and your personal data is very important to us.

2 Name and contact information of the controller

The 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

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

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

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

Sven Lindenlauf

eyeDsec Information Security GmbH

e-mail: dataprivacy@allunity.com

Any data subject can contact our DPO directly at any time with any questions or suggestions regarding data protection.

4 Processing of your personal data

4.1 General data processing when visiting the platform

When you simply visit the platform, we do not collect any personal data (subject to the further information in this data protection policy), with the exception of the data that your browser automatically transmits, in particular to enable you to visit the website. This includes, for example

- IP address of the requesting computer
- Date and time of access
- Amount of data transferred in each case
- Browser type and browser version
- Operating system used
- Referrer URL

The aforementioned processing of personal data is generally carried out for the purpose of enabling the use of the platform (establishing a stable connection) or to improve the attractiveness and usability of the platform and, if necessary, to recognize technical problems and malfunctions on the platform at an early stage.

The aforementioned data will only be stored for as long as it is required for the aforementioned purposes. Insofar as the processing of the aforementioned data involves personal data, the corresponding processing of this data is based on Art. 6 (1) lit. f) GDPR (legitimate interest). The specific legitimate interest results from the aforementioned purposes.

In the course of this data processing, the above-mentioned data may also be transmitted to our hosting service provider. The service provider is used to provide the platform and ensure its permanent and secure availability. A corresponding data processing contract has been concluded with the hosting provider, which obliges the service provider to comply with the relevant data protection regulations and guarantees a uniform level of data protection.

4.2 Data processing when logging in to our platform

If you are already a customer of ours, you have the option of logging in to the platform with your login data. In this context, we also process the following personal data from you in addition to the data types mentioned above:

- (company) e-mail address
- Password

By logging in, we are also able to identify you and link the technical data to your specific person when you visit the website.

The aforementioned processing of personal data is generally carried out for the purpose of enabling you to use the platform and granting you access to your customer area. The processing of your registration and account data is based on the existing contract with you (Art. 6 (1) lit. b) GDPR).

For further information on the processing of your customer data, please refer to our data protection information for customers. The data protection information for customers applies accordingly to the provision of further personal data by you on the platform.

4.3 Data processing in the course of contact requests

If you contact us via the contact options provided on the platform (e-mail addresses, telephone numbers, contact form, etc.), the personal data you provide in this context (such as your name, e-mail address) will be processed in order to answer your inquiry.

The legal basis for the processing of the aforementioned personal data is Art. 6 (1) lit. f) GDPR (legitimate interests). The specific legitimate interest arises from the fact that the action desired by the user (*here*: answering an inquiry) can only be carried out through appropriate data processing. If the contact is aimed at the conclusion of a contract, the legal basis for the processing is (additionally) Art. 6 (1) lit. b) GDPR (fulfillment of contract or pre-contractual measures). Your personal data will be stored in this context until the purpose of processing expires (regularly after the inquiry has been answered), provided that there are no statutory retention obligations to the contrary or a legitimate interest in longer storage.

4.4 Data processing through Cookies

The platform partly uses so-called „cookies“. Cookies are small text files that are stored on your computer and saved by your browser.

We use so-called session cookies to recognize that you have already visited individual pages of our platform. Session cookies are only stored for the duration of your access to the platform and are automatically deleted when you close your browser or leave the platform. These cookies do not contain any personal data, but merely identify the browser used to access the website. They are used to make the platform more user-friendly, effective and secure and to make it easier for you to navigate through the platform.

We also use so-called temporary cookies. These make it possible to store specific information related to the device on the user's access device (PC, smartphone, etc.), even beyond a single session. They are used, for example, to retain page settings for future visits to the platform. These cookies enable us to recognize your browser the next time you visit.

The aforementioned cookies are primarily used to carry out an electronic communication process or to provide certain functions you have requested. The legal basis for the corresponding processing of personal data is Art. 6 (1) lit. f) GDPR (legitimate interest) insofar as the cookies concerned are technically necessary for the provision of the services you have requested. The specific legitimate interest arises from the above-mentioned purposes, in particular the optimization of platform use.

If the cookies used are not to be classified as technically necessary, we will obtain your consent for this in accordance with Art. 6 (1) lit. a) GDPR in conjunction with § 25 (1) TDDDG.

As a rule, you can configure your browser so that no cookies are stored or a message always appears before a new cookie is created. However, deactivating cookies may mean that you cannot (fully) use all the functions of our platform.

Insofar as other cookies or cookie-like tools (e.g. tools for analyzing your surfing behavior) are used on or in connection with the platform, these are dealt with separately below.

4.5 Google Analytics

If you give your consent in accordance with Art. 6 (1) lit. a) GDPR in conjunction with § 25 (1) TDDDG when visiting the platform, we use Google Analytics to analyze your user behavior. Google Analytics is a web analysis service of Google Inc, 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA ("Google"). Google Analytics uses cookies, which are stored on your computer and enable your use of the website to be analyzed. The information generated by the cookie about your use of the website is usually transmitted to a Google server and stored there. This server may also be located in the USA.

However, since we have activated IP anonymization on the platform, your IP address will be shortened by Google within member states of the European Union or in other states of the European Economic Area beforehand. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. On behalf of the operator of this platform, Google will use this information to evaluate your use of the website in order to compile reports on platform activities. The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data.

You can prevent the storage of cookies (after giving your consent) by setting your browser software accordingly. However, we would like to point out that in this case you may not be able to use all the functions of the platform to their full extent. You also have the option of withdrawing your consent at any time with effect for the future.

Further information on Google Analytics can be found here:

<https://marketingplatform.google.com/about/analytics/terms/us/> & <https://policies.google.com/privacy>

We have concluded a data processing agreement with Google. We have also concluded the European Commission's standard data protection clauses (SCC) with Google to safeguard data protection in the event of a possible transfer to a third country (e.g. the USA). Google has also certified itself to the EU-US Data Privacy Framework and has thus undertaken to guarantee a level of data protection that is equivalent to the level of data protection in the EU.

5 Duration of data retention

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.

6 Data transfers to third parties

The personal data collected in the course of using the platform will not be passed on to third parties or transmitted in any other way without your consent, except in other cases expressly described in this data protection notice.

We may use (technical) service providers who process personal data on our behalf (e.g. IT service providers, hosting service providers, etc.). These service providers process the relevant personal data exclusively in accordance with our instructions (processors). The legal basis for such data processing is generally Art. 6 (1) lit. f) GDPR (legitimate interest; see above for the corresponding legitimate interests). Corresponding data processing agreements have been concluded with the processors used in accordance with Art. 28 GDPR.

We may also disclose your personal data to third parties if we are legally obliged to do so (e.g. at the request of a court or law enforcement agency). The legal basis for such data processing is Art. 6 (1) lit. c) GDPR (legal obligation).

As a rule, data is not transferred to a country outside the European Union or the European Economic Area (so-called third country). 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.

7 Data processing locations

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.

8 Rights of the data subject

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.

9 Security of your personal data

We use suitable technical and organizational means to protect the data you transmit to us against accidental or intentional manipulation, loss, destruction or access by unauthorized persons. Our security measures are continuously monitored and improved in line with technological developments and organizational possibilities.

10 Further information

In principle, there is no (legal) obligation to provide your personal data. However, when using the platform, we must collect at least the personal data that is required for the provision of the platform or that we are legally obliged to collect. If this data is not provided, we may not be able to provide the platform.

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