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## RESEARCH PORTAL DATA PROTECTION NOTICE

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This Research Portal Data Protection Notice describes how Baader Bank Aktiengesellschaft, Weihenstephaner Straße 4, 85716 Unterschleißheim, Germany ("**Baader Bank**" or "**we**" or "**us**" or "**our**") as controller processes the personal data and other information of the users ("**you**" or "**your**") in particular within the meaning of the General Data Protection Regulation ("**GDPR**") when using the research portal <https://baader.alphavalue.com> ("**Research Portal**").

### **1. Categories of personal data, processing purposes, legal basis and source**

#### **1.1 Personal Data actively provided by you:**

In order to create a user account on our Research Portal, we will ask you or your employer to provide the following personal data about you: Name, company name, email address, telephone number. We will provide you with a username and a password. Baader Bank processes such personal data for the purpose of providing our services to you. Providing such personal data is voluntary. However, without providing such personal data, you will not be able to create a user account. The legal basis for the processing of such personal data is the contract on the use of the Research Portal concluded with you (Art. 6 (1) lit. b GDPR).

#### **1.2 Other passively collected information:**

The Research Portal will also automatically collect, process and store certain information from you:

- Device and usage information – that may include (i) information specific to the used device to access the Research Portal (including, but not limited to, model, operating system, IP address, language, carrier and similar information) and (ii) information about the use of features, functions, or notifications on the device, to recognize you and to be able to provide the services. The legal basis for the collection of such strictly necessary information is contract performance (Art. 6 (1) lit. b GDPR). The Research Portal may also collect the browser type and broad geographic location (e.g. country or city-level location). The legal basis for the collection of not strictly necessary information are our legitimate interests (Art. 6 (1) lit. f GDPR) which are the following: to analyze trends, usage and activities in connection with our Research Portal. More information on the balancing test is available upon request.
- Website analytics – such as how often a user uses the Website, aggregated usage, performance data. We use Website analytics to allow us to better understand the functionality and use of our Website. The legal basis are our legitimate interests (Art. 6 (1) lit. f GDPR) which are the following: to monitor and maintain the performance of the Research Portal and to analyze trends, usage and activities in connection with our Research Portal. More information on the balancing test is available upon request.
- To the extent you have consented, the Research Portal will automatically collect, process and store usage information about you, such as stock, title of the product, click date, publication date of the research information that you accessed. Via a Global Unique Identifier, we are able to identify you when you are accessing the Research Portal. We will match the usage information collected via the Research Portal with the personal data we have in our CRM database about you (name, company name, email address, telephone number) and may contact you via telephone or email for targeted sales activities based on your usage behavior. The legal basis for the collection, matching and processing of such information is your consent (Art. 6 (1) a GDPR).

- To the extent you make use of the chat functionality, the Research Portal will store all communication of the chat functionality, i.e. content of the chat as well as metadata of the chat. The legal basis for the storage is compliance with a legal obligation to which Baader Bank is subject (Art. 6 (1) c GDPR).

## **2. Recipients**

### **2.1 Transfer to service provider**

One of the Joint Controllers, AlphaValue, also acts as an external service provider and thus as a data processor of Baader Bank. Alpha Value provides IT infrastructure and IT support services to Baader Bank. When providing such service, AlphaValue may have access to and/or may process your personal data.

The communication via the chat functionality may also be stored by an external service provider engaged by Baader Bank.

External service providers will be subject to contractual obligations to implement appropriate technical and organizational security measures to safeguard the personal data and to process the personal data only as instructed.

### **2.2 Other recipients**

Some of our colleagues administering the Research Portal and providing IT services may be employees of our group companies (Baader Helvea AG, Baader Helvea Ltd., Baader Helvea Inc.). When administering the Research Portal our colleagues may have access to and/or may process your personal data. The respective transfer of your personal data is based on our legitimate interests. Our legitimate interests are the transmission of personal data within the group of companies for internal administrative and support purposes. The access is limited to colleagues with a need to know. More information on the balancing test is available upon request.

Some of our group companies are located outside the European Economic Area (EEA) in countries that do not provide for an adequate level of data protection. The countries that are recognized to provide for an adequate level of data protection from an EU law perspective (Art. 45 GDPR) are Andorra, Argentina, Canada, Switzerland, Faeroe Islands, Guernsey, the State of Israel, Isle of Man, Jersey, New Zealand and the Eastern Republic of Uruguay. Recipients in the US may partially be certified under the EU-U.S. Privacy Shield and thereby deemed to provide for an adequate level of data protection from an EU law perspective (Art. 45 GDPR). To the extent your personal data are transferred to countries that do not provide for an adequate level of data protection from an EU law perspective, we will base the respective transfer on appropriate safeguards, such as standard data protection clauses adopted by the European Commission (Art. 46 (2) GDPR). You can ask for a copy of such appropriate safeguards by contacting us as set out in Section 5.

Baader Bank may also transfer your personal data to law enforcement agencies, governmental authorities, legal counsel and external consultants in compliance with applicable data protection law. The legal basis for such processing is compliance with a legal obligation to which the Baader Bank is subject to or are legitimate interests, such as exercise or defense of legal claims. More information on the balancing test is available upon request.

## **3. What rights do you have and how can you assert your rights?**

If you have declared your consent for any personal data processing activities, you can withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal.

Pursuant to applicable data protection law you may have the right to: request access to your personal data, request rectification of your personal data; request erasure of your personal data,

request restriction of processing of your personal data; request data portability, and object to the processing of your personal data. Please note that these aforementioned rights might be limited under the applicable national data protection law. For further information on these rights please refer to the Exhibit Your Rights.

You also have the right to lodge a complaint with a data protection supervisory authority. To exercise your rights please contact us as stated in Section 5.

#### **4. How long do we keep your Personal Data?**

Your personal data will be retained as long as necessary to provide you with the services requested. When Baader Bank no longer needs to use your personal data to comply with contractual or statutory obligations, we will remove it from our systems and records and/or take steps to properly anonymize it so that you can no longer be identified from it, unless we need to keep your information, including personal data, to comply with legal or regulatory obligations to which Baader Bank is subject, e.g. statutory retention periods which can result from Commercial Code, Tax Code and usually contain retention periods from 6 to 10 years, or if we need it to preserve evidence within the statutes of limitation, which is usually three years but can be up to thirty years.

#### **5. Contact us**

If you have concerns or questions regarding this Research Portal Data Processing Notice, please contact us as follows:

Baader Bank AG, Weihenstephaner Straße 4, 85716 Unterschleißheim, Germany

Tel.: +49 (0) 8951500

Fax: + 49 (0) 8951501111

Email: [service@baaderbank.de](mailto:service@baaderbank.de)

The contact details of our data protection officer are as follows:

Baader Bank AG, Weihenstephaner Straße 4, 85716 Unterschleißheim, Germany

Email: [datenschutz@baaderbank.de](mailto:datenschutz@baaderbank.de)

## Exhibit

### Your Rights

#### 1. Right of access

You may have the right to obtain from us confirmation as to whether or not personal data concerning you is processed, and, where that is the case, to request access to the personal data. The access information includes – inter alia – the purposes of the processing, the categories of personal data concerned, and the recipients or categories of recipients to whom the personal data have been or will be disclosed. However, this is not an absolute right and the interests of other individuals may restrict your right of access.

You may have the **right to obtain a copy of the personal data undergoing processing**. For further copies requested by you, we may charge a reasonable fee based on administrative costs.

#### 2. Right to rectification

You may have the right to obtain from us the rectification of inaccurate personal data concerning you. Depending on the purposes of the processing, you may have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

#### 3. Right to erasure ("right to be forgotten")

Under certain circumstances, you may have the right to obtain from us the erasure of personal data concerning you and we may be obliged to erase such personal data.

#### 4. Right to restriction of processing

Under certain circumstances, you may have the right to obtain from us restriction of processing your personal data. In this case, the respective data will be marked and may only be processed by us for certain purposes.

#### 5. Right to data portability

Under certain circumstances, you may have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit those data to another entity without hindrance from us.

#### 6. Right to object

**Under certain circumstances, you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data by us and we can be required to no longer process your personal data.**

**Moreover, if your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing. In this case your personal data will no longer be processed for such purposes by us.**