

**Status: December 2025**

**Privacy Notice for heartstocks GmbH, Neuer Wall 54, 20354 Hamburg**

**Note: Only the German version of the Privacy Notice is legally binding.**

Below, we inform you about the processing of your personal data by us and about the claims and rights you are entitled to under data protection regulations. Which specific data is processed and how it is used depends primarily on the services requested or agreed upon.

## **1. Who is responsible for data processing and whom can I contact?**

The responsible party is:

### **heartstocks GmbH**

Neuer Wall 54

20354 Hamburg

Phone: +49 (0) 40 57228369

Email: [info@heartstocks.com](mailto:info@heartstocks.com)

You can reach our Data Protection Officer at:

### **heartstocks GmbH**

Enno Johann Henke

Neuer Wall 54

20354 Hamburg

Phone: +49 (0) 40 57228369

Email: [enno.henke@heartstocks.com](mailto:enno.henke@heartstocks.com)

## **2. What sources and data do we use?**

We process personal data that we receive directly from you or through our contractually bound intermediaries as part of our business relationship. Additionally, we process – to the extent necessary for providing our services – personal data that we have lawfully obtained from other companies and third parties (e.g., publicly accessible sources such as commercial registers, press, or media).

Relevant personal data includes personal details (name, address and other contact details, date and place of birth, gender, marital status, legal capacity, occupational group or occupational key, nationality), identification data (e.g., ID card data) and authentication data (e.g., signature specimen, digital signature), as well as tax ID and FATCA status. This may also include order data (e.g., purchase and payment orders, securities orders), data from fulfilling our contractual obligations (e.g., transaction data),

product data in financial services, information about your financial situation (e.g., creditworthiness data, origin of assets), advertising and sales data (including advertising scores), documentation data (e.g., consultation records), register data, data regarding your use of our telemedia services (e.g., time of access to our websites, apps, or newsletters, pages clicked, entries), and other data comparable to the categories mentioned.

### **3. For what purposes and on what legal basis do we process your data?**

We process personal data in accordance with the provisions of the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG):

#### **3.1 To fulfill contractual obligations (Article 6(1)(b) GDPR)**

Data processing is carried out to provide financial services, in particular for executing contracts or pre-contractual measures with you and carrying out your orders, as well as for all activities required for the operation and administration of a financial services institution. The purposes are primarily determined by the specific product (e.g., investments, brokerage) and may include needs analyses, consulting, and execution of transactions.

#### **3.2 Based on legitimate interests (Article 6(1)(f) GDPR)**

Where necessary, we process your data beyond the actual performance of the contract to safeguard legitimate interests of ours or of third parties, for example:

- Reviewing and optimizing methods for needs analysis and direct customer contact
- Advertising or market and opinion research, insofar as you have not objected to the use of your data
- Ensuring IT security and IT operations at heartstocks
- Preventing and investigating criminal offenses
- Measures for building and facility security
- Risk management within the company

#### **3.3 Based on your consent (Article 6(1)(a) GDPR)**

If you have given us consent to process personal data for specific purposes (e.g., disclosure of data to third parties or marketing), the processing is lawful based on your consent. Consent can be withdrawn at any time.

### **3.4 Due to legal obligations (Article 6(1)(c) GDPR)**

As a financial services company, we are subject to various legal obligations that require data processing, such as anti-fraud and anti-money-laundering regulations.

### **4. Who receives my data?**

Within heartstocks GmbH, access to your data is granted only to those departments that need it to fulfill our contractual and legal obligations. Additionally, service providers we engage (e.g., IT service providers, payment service providers) may receive data. These recipients are contractually obligated to comply with data protection regulations.

### **5. How long will my data be stored?**

We process and store your personal data for as long as necessary for our business relationship, including contract initiation and processing. We are also subject to statutory retention and documentation obligations arising from the German Commercial Code (HGB), the Anti-Money Laundering Act (GwG), and other relevant regulations. Retention periods generally range from two to ten years.

### **6. Will data be transferred to a third country or international organization?**

Data transfers to countries outside the European Economic Area (EEA) occur only if necessary for executing your orders or if you have given consent. We will inform you of details should such a transfer become necessary.

### **7. What data protection rights do I have?**

Every data subject has the right to access, rectify, erase, restrict processing, and data portability. Restrictions under §§ 34 and 35 BDSG apply. You also have the right to lodge a complaint with the competent supervisory authority.

### **8. Am I required to provide data?**

As part of our business relationship, you must provide only the personal data necessary for establishing, implementing, and terminating the relationship, or data we are legally required to collect.

### **9. Is there automated decision-making?**

We do not use fully automated decision-making according to Article 22 GDPR to establish or conduct business relationships.

**10. Will my data be used for profiling (scoring)?**

We partially process your data automatically to evaluate certain personal aspects (profiling), for example to inform you about products in a targeted manner or to fulfill regulatory requirements, such as in the area of anti-money-laundering.

**11. Information about your right to object under Article 21 GDPR**

You have the right to object at any time to the processing of your personal data for direct marketing purposes. This also applies to profiling related to direct marketing. If you object to processing for direct marketing, we will no longer process your personal data for these purposes.

Objection address: Email: [info@heartstocks.com](mailto:info@heartstocks.com)