

Privacy Policy of ayondo portfolio management GmbH

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Within the scope of the use of ayondo, auto execution personal data of the customers are collected, processed and used.

ayondo portfolio management GmbH

(hereinafter referred to as "ayondo")

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Commercial Register: District Court of Frankfurt am Main

HRB 102933

is the responsible entity within the terms of data protection laws.

1 GENERAL PROVISIONS

ayondo takes data protection and data security very seriously. Accordingly, we hereby give an undertaking to treat your data in confidence. Third parties which are not bound by the data sharing agreement within the ayondo group will only receive your personal

data as far as this is permitted by data protection laws, ordered by a competent authority or if you explicitly consent to it.

2 PERSONAL DATA

Personal ("person-linked") data is data that can be unambiguously assigned to a specific individual, and can thus be used to obtain personal or factual information about you.

Using the services of ayondo requires prior registration on the website www.ayondo.com as well as a suitability test. During this process the following information must be provided:

- First name and family name
- Address
- Telephone number
- E-Mail address
- Information on your financial situation (eg annual income, existing assets, information of an employment relationship)
- Information on investment objectives
- Information on knowledge and experience with CFDs

3 WHAT TYPES OF DATA DO WE GATHER AND STORE, AND FOR WHAT PURPOSE?

In connection with the use of the website on which we offer our services, data is stored on our servers even if a contract with the customer is not concluded. This data is regularly deleted. No personal-linked evaluation is carried out. The statistical evaluation of pseudonymized or anonymous data sets is reserved (what do they

mean? Reserved for what? The sentence is not complete). For example, it is stored for system security reasons as IP-logs, for improving the website and for the purposes of statistics. Please note that we use Google Analytics (in respect of the use of Google Analytics please see section 7).

In the event of the conclusion of a contract, the data specified in section 2 will be collected, stored, processed and used for the execution of the contract. The purpose of the collection, processing, storage and use of your personal data by ayondo is to provide our service according to the contractual agreements concluded with the customer.

For other purposes the processing and use of your data only takes place if you have expressly agreed to this use. For example, your data will not be used for promotional purposes without such consent. You will only receive advertising from ayondo if you have expressly given your consent. You can revoke this consent at any time by sending an email to service@ayondo.com.

4 DATA SHARING AGREEMENT

ayondo has entered into a data sharing agreement with ayondo GmbH and ayondo markets Ltd. according to which the aforementioned companies are able to access the data collected and stored by ayondo for the purpose of carrying out their contracts with customers of ayondo. By signing a contract with ayondo portfolio management GmbH, you declare that you agree to the sharing of personal data between the aforementioned companies.

5 DOES AYONDO USE COOKIES?

ayondo uses "cookies" within the use of Google Analytics (regarding the use of Google Analytics please see section 7). Cookies are used solely to determine the frequency of use and the number of users of our website, or to optimize the display of advertising messages. On certain pages, advertisements from companies or agencies are delivered directly: cookies and/or web beacons may be used without any influence from us, or without us being able to notify you about it. The respective advertiser is responsible for this.

Use of our service is also possible without cookies. Most browsers are pre-configured to accept cookies automatically. However, you can disable the storage of cookies or allow them only on demand. We should point out that you may be able to use our website but only under restricted conditions when cookies are rejected.

6 DO WE PASS ON YOUR DATA TO THIRD PARTIES?

In certain cases, legal provisions require us to pass on your personal data to third parties, such as, for example, criminal prosecution agencies.

In all other instances, your data is stored exclusively in our database and on our servers, or those of companies contracted by us to process data. Otherwise, data is passed on to third parties only if you have previously consented thereto.

ayondo shall not be held liable for the confidential handling of your data by third parties, as such matters are beyond our control. Our Website, for example, contains links to other websites. We are

unable to ensure that the operators of such sites comply with the privacy policy.

7 USE OF GOOGLE ANALYTICS

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies" which are text files placed on your computer to help the website analyse how visitors use the site. The information generated by the cookies of tje your use of the website (including your IP address) will usually be transmitted to and stored by Google on servers in the United States. However, in the case of the activation of the IP anonymity on this website, your IP address will have been previously abridged by Google within the Member States of the European Union or in other states bound by the Agreement in the European Economic Area. Only in exceptional cases will the full IP address be transferred to a Google server in the US and abbreviated (what do they mean?) there. On Behalf of the operator of this website Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google will not associate your IP address as provided by your browser with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser; however please note that if you do this you may not be able to use or have the the full functionality of this website.

You can prevent Google's collection and use of data (cookies and IP address) related to the use of this website by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout?hl=de>

You can prevent the collection of data by Google Analytics by clicking on the following link. An opt-out cookie is set which prevents the future collection of your data when you visit this website: <http://tools.google.com/dlpage/gaoptout?hl=de>

Further information concerning the terms and conditions of use and data protection can be found at <https://www.google.com/analytics/terms/de.html> or at <https://www.google.de/intl/de/policies/>. Please note that this website extends Google Analytics by the code „gat._anonymizeIp();“ to guarantee the anonymized collection of IP addresses (so-called IP-Masking).

8 USE OF SOCIAL PLUGINS

This website uses so-called "social plugins" from the social network Facebook, which is operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA, and Twitter Inc., Folsom St., Suite 600, San Francisco, CA 94107 USA. The plugins are recognizable by the logo of the respective social network.

When you visit our website your browser uses these social plugins to connect directly to the Facebook and Twitter servers. The content of the plugin is transmitted directly from Facebook and Twitter to your browser, which integrates this into the website visited. Therefore, we have no influence on the amount of data collected by Facebook and Twitter. According to our knowledge this data consists of the following information:

Through the integration of the social plugins, the operators of the social networks receive the information namely that you have visited the respective pages of our Internet website. If you are

logged in to one of the social networks at the same time, the operator can assign the corresponding page visits to your account at the respective social network. If you also interact with the social plugins, for example, by clicking on the "Like Button" or write a comment, the respective information is communicated to the respective social network.

To the best of our knowledge the following data is provided:

- IP address
- Browser version and operating system
- Previously visited page (Referrer), if you have followed a link
- display resolution
- Installed plug-ins, such as Adobe® Flash® or Adobe® Reader®
- URL of the page where the Facebook Like button is embedded

Even if you are not a member of one of the social networks mentioned above, it is possible that they can obtain your IP address via the social plugin and save it. For details on the purpose and scope of the data processing, collection and use by Facebook and Twitter and your rights and setting options, please refer to the Privacy Policy:

Regarding Facebook: <http://www.facebook.com/policy>

Regarding Twitter: <http://www.twitter.com/privacy>

If you are a member of one of the aforementioned social networks and do not want them to collect data about you via our website, and

link this data with your respective member data, please log out of the respective social network before visiting our website.

You can prevent data from being transferred. Please adjust the security settings in the browser you are using (eg Internet Explorer, Firefox, Google Chrome, Safari). To learn how to do this, please refer to the "Help" section of your browser. In addition, you can block social plugins using add-ons for your browser such as the Facebook plug-in with the "Facebook Blocker" which is available for downloading here:

<http://webgraph.com/resources/facebookblocker/>

9 DATA SECURITY

Insofar as we collect data, we or our contract data processors will store your data on specially protected servers within the European Union. Access is only granted to a few specially authorized persons.

In order to avoid loss or misuse of the data stored at ayondo, we make extensive technical and operational safety checks that are regularly checked and adapted to the technological progress. However, we should point out that due to the structure of the Internet it is possible that other persons or institutions outside of our control do not comply with the rules of data protection

Your personal data will be securely transmitted by encryption on our website. We use the encoding system SSL (Secure Socket Layer). In addition, we protect our website and other systems by technical and organizational measures against the loss, destruction, access, alteration or dissemination of your data by unauthorized persons.

10 CONTACT

Should you have any further questions regarding this privacy policy or the processing of your personal data, please contact us at service@ayondo.com

11 AMENDMENTS

Legal amendments may require amendments to this privacy policy. We therefore recommend that you check this privacy policy on a regular basis.