

List of data protection procedures in accordance  
with Sec. 4g, 4e of German data protection law  
(BDSG)

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## NAME OF THE RESPONSIBLE OFFICE:

ayondo portfolio management GmbH

## MANAGEMENT:

Mr Robert Lempka, Herr Kurt Ziegler

## APPOINTED HEAD OF DATA PROCESSING:

Mr Bastian Huber (Employee of ayondo GmbH)

## ADDRESS OF THE RESPONSIBLE OFFICE:

Niddastraße 91, 60329 Frankfurt am Main

## PURPOSE OF DATA COLLECTION, PROCESSING AND USE

The purpose of the company is the provision of portfolio management in accordance with the German Banking Act (Gesetz über das Kreditwesen, KWG). The core service offered is an atypical asset management.

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Any collection, processing and use of data is done solely to achieve the above purposes unless the person concerned has expressed his/her consent to any additional use of the data (e.g. for certain advertising purposes) or using the data for other purposes is permitted by law.

## DESCRIPTION OF THE AFFECTED GROUP OF PEOPLE AND THE RELEVANT DATA OR DATA CATEGORIES

- Customer data or data about contact persons of clients of the company, as long as these are necessary for the fulfillment of the aforementioned purposes.
- Personal data of employees (internally and externally) which are usually required to fulfill employment and service contracts.
- Data about business partners

## RECIPIENTS OR CATEGORIES OF RECIPIENTS WITH WHOM THE DATA MAY BE SHARED

- Public agencies and authorities only if compulsory, overriding legal provisions apply.
- Internal bodies involved in the execution of the respective business processes. External service providers, contractors as per §11 BDSG in the context of order processing or other third parties, insofar as it is legally permitted or with the consent of the person concerned.

Beyond the fulfilment of the above-mentioned purposes, a data transfer will only take place if this is permitted by applicable law or with the consent of the affected person.

## STANDARD DEADLINES FOR DELETING THE DATA

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After expiry of the various statutory retention duties and deadlines, the corresponding data will be deleted. Data which is not affected by this will be deleted when the aforementioned purposes no longer exist.

## **PLANNED DATA TRANSFER TO COUNTRIES OUTSIDE THE EU**

Usually personal data is not being transferred to third countries. Also, it is not intended to transfer personal data to third countries in the future. However, should data be transferred to countries outside the EU (e.g. Switzerland, USA) for the purpose of the contractual relations, the company will take appropriate measures to ensure that the data is protected to the same extent as it is protected in the countries of the European Union.

## **OVERVIEW OF GROUPS OF PERSONS OR INDIVIDUALS AUTHORIZED TO ACCESS THE DATA**

Access to customer data is reserved for the management, data processing employees of service providers and the responsible supervisory authorities.